


Procedure Title: Accessibility Standards for Customer Service			Procedure Number ADM 090-001
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Approval: Chief Administrative Officer 		Point of Contact Director, Community Services	

Procedure Objective

This outlines the corporate procedure with respect to the establishment of accessibility standards for customer service in accordance with Ontario Regulation 429/07 created under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA).

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01 Definitions

- 01.01 **Accessibility Standard** – Ontario Regulation 429/07 created under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) which provides for standards to enhance the accessibility for an organization ("the Standard").
- 01.02 **Assistive Device** – Any device that is designed and/or adapted to assist a person to perform a particular task (e.g. canes, crutches, walkers, wheel chairs, personal sound amplification devices, ventilators, etc.).
- 01.03 **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 and any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment;
 - 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*.
- 01.04 **Customers**
- a) all staff;
 - b) Mayor and Members of Council;
 - c) other political representatives;
 - d) citizens and visitors to the City of Pickering;
 - e) businesses;
 - f) volunteers and agents recognized by the City; and
 - g) all community stakeholders.

- 01.05 **Guide Dog** – As defined in Section 1 of the *Blind Person's Rights Act, 1990*, which is a dog trained as a guide for a blind person and having the qualifications prescribed by the regulations.
- 01.06 **Premises** – premises include the buildings, structures, land or grounds where an organization provides goods, services or facilities. The requirements of Ontario Regulation 429/07 apply only to those areas of the premises where the public or third parties customarily have access.
- 01.07 **Service Animal** – as reflected in Ontario Regulation 429/07, an animal is a service animal for a person with a disability if:
- a) it is readily apparent that the animal is used for reasons relating to their disability; or
 - b) the person provides a letter from a medical practitioner confirming that the person requires the animal for reasons relating to their disability.
- 01.08 **Support Person** – as reflected in Ontario Regulation 429/07, a support person means a person who accompanies a person with a disability in order to assist with communication, mobility, personal care, medical needs or access to goods, services or facilities.

02 Procedures

- 02.01 The AODA was enacted in 2005 in order to facilitate the development of specific standards with respect to improving accessibility across the province. Ontario's first accessibility standard, the Customer Service Standard (Standard), came into force on January 1, 2008. The Standard outlines what organizations must do in order to ensure that customer service is accessible to everyone, including people with disabilities. All public sector organizations with more than twenty employees must have complied with the Standard by January 2, 2010.

03 Scope and Responsibilities

- 03.01 City staff are to be trained on how to provide customer service to people with disabilities in accordance with the core principles of the accessibility standard. Training must be delivered to any employee, volunteer, and/or agent as well as any other individual who might reasonably be expected to interact with the public on behalf of the City or influence the development of policies, practices and procedures. The level of training and awareness will be determined by the Director, Community Services in consultation with Departments and Human Resources and in accordance with the requirements of section 6 of Ontario Regulation 429/07.

04 Customer Service Policies, Practices and Procedures

04.01 The City of Pickering will make reasonable efforts to ensure that its policies, practices and procedures are consistent with the core principles of the Standard:

- dignity
- independence
- integration, except when alternate measures are necessary to meet the needs of people with disabilities
- equal opportunity

By considering these principles when developing policies, practices, and procedures, accessibility planning becomes entrenched within the decision making process and satisfies the spirit with which the AODA, 2005 was enacted.

04.02 Dignity and Independence - customer service will be provided in a manner that respects the dignity and independence of people with disabilities. People with disabilities should not be forced to accept lesser service, quality or convenience as a result of their disability.

04.03 Integrated Services - that allow people with disabilities to fully benefit from the same services, in the same place and in the same or similar manner as other customers. Service provision and associated procedures will be inclusive of all customers and clients. There are occasions when customer service must be provided using alternative measures which are not integrated. Alternative measures will only be employed when they cannot be integrated and are the only means of providing customer service to a person with a disability.

04.04 Equal Opportunity - people with disabilities will be given an equal opportunity to use and benefit from services provided by the City. People with disabilities should not be required to put forward a greater effort in order to access, use and/or benefit from a service. As a result, additional services may be extended to people with disabilities in order to ensure they do not need to put forward a greater effort.

05 Communication

05.01 Communication will be provided in a manner that takes into account an individual's disability. Consideration is given to the way in which individuals express, receive and process information without making assumptions about a particular disability. Individuals with the same disability may process information in different ways. The City will continue to review the nature, manner and methods with which it communicates to people with disabilities in an attempt to improve the accessibility of information and services.

05.02 **Website** - the Office of the CAO, Corporate Communications section is responsible for the overall look of the City's website. The City of Pickering will provide its site in a format that is accessible to persons with disabilities unless it is not technically feasible to do so. The City's website uses a pre-set font type and size for optimal layout, but in all cases the font and size is readily available in HTML format with Adobe PDF as the standard for documents and reports. The City is committed to use of World Wide Web Consortium (W3c.org) best practice technologies when they are available and appropriate for a task and use of the latest versions when supported. These strategies include:

- use of navigation mechanisms in a consistent manner
- essential components of the page work without a mouse
- providing information about the general layout of a site (e.g. a site map or table of contents)
- good colour contrast between foreground and background
- easily readable text. Text size can be adjusted by the user using browser controls
- providing a text equivalent for no-text elements (e.g. via "alt or alternate" text tags). This includes: images, graphical representations of text (including symbols, image map regions, animations, applets and programmatic objects, audio files, audio tracks of video
- use of full text pages
- use of style sheets to control layout and presentation
- Browse Aloud
- Live Chat

05.03 **Print Material** - the City's Communications Policy and Corporate Writing Guide provides for documentation standards related to print material (date and time standards, numeric standards, font sizes, spelling conventions, correspondence and report templates). The need for accessible fonts in printed material must be balanced with the need for a strong corporate identity and consistency in documentation. Consideration must also be given to the fact that there is no "one size fits all" solution to fonts in printed information.

The City will provide any document produced by the City, in an alternate format upon request, unless it is not technically feasible to do so, and subject to the *Municipal Freedom of Information of Privacy Act*. Alternate formats can include, but are not limited to web access, large print versions of the document or a text only electronic file which can then be read by a computer or printed in Braille. Requests for information in alternate format will be sent to the Customer Care Centre and forwarded to the department most responsible for the document. Staff will consult with the requester to

determine the most appropriate format, and will make every effort to provide the information in the preferred format as soon as possible.

06 Notice of temporary Disruptions

- 06.01 People with disabilities may rely on certain systems or amenities to access a City facility or utilize a service. Disruptions to these can provide complications for people with disabilities as they may have to book accessible transit or make alternate arrangements. As a result, public notice will be provided when pool lifts and/or washrooms. Notice will be provided for anything that may reasonably prohibit or limit the use of a service or facility by a person with a disability. The notice will be conspicuously displayed at the premises with which the disruption has occurred. If feasible, it will be posted on the City's website under Accessible Pickering section and communicated by various other means as deemed necessary (i.e. media release, Accessible Pickering web page, service disruption line, social media, etc.). The content of the notice will include the reason for the disruption, the expected duration if any, and for staff to ensure consistent messaging refer to Service Disruption Standard Operating Procedure.

07 Service Animals

- 07.01 When a person with a disability is accompanied by a guide dog or other service animal, the City of Pickering shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with them unless the animal is otherwise excluded by law from the premises.
- 07.02 Two (2) examples of laws that specifically exclude animals are regulations under the *Health Protection and Promotion Act* and the *Food Safety and Quality Act, 2001*.
- a) Ontario Regulation 562, under the *Health Protection and Promotion Act*, states that animals are not allowed in places where food is "manufactured, prepared, processed, handled, served, displayed, stored, sold, or offered for sale". It does make an exception for service animals to allow them to go where food is normally served, sold or offered for sale. Other types of service animals are not included in this exception.
- 07.03 If a service animal is excluded by law from the premises, the City of Pickering staff must explain to the individual why the animal is excluded and ensure that other reasonable alternative measures are available to enable the person with a disability to obtain, use or benefit from the City's goods, services or facilities. If the person with the service animal agrees, this might

mean leaving the animal in a secure area where it is permitted by law and offering the guidance of an employee. It might also mean offering to serve the person in another location where the animal is permitted.

- 07.04 There may be rare circumstances where, for the reasons of the health and safety of another person, allowing a person with a disability to enter the premises and be accompanied by their service animal needs to be considered. Where another person's health or safety could be seriously impacted by the presence of a service animal, City of Pickering staff should fully analyze all options for safely allowing the service animal on premises open to the public.

If a person has allergies triggered by touching or being in close proximity to animals over a period of time, options to consider may be to create distance between the two individuals, eliminating personal contact, using air purifiers, changing the time the two people receive service, or any other measure that would allow both people to receive service on the premises. City staff must consult with both people and consider all relevant factors and options in trying to find a solution that meets the needs of both individuals.

08 Support Persons

- 08.01 When a person with a disability is accompanied by a support person, the City of Pickering shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.
- 08.02 Within the Community Services Department of the City of Pickering, no user fees or admission fees are charged to a support person. When a user fee or admission fee is applicable with respect to a support person in any other department or division of the City of Pickering, notice must be given in advance and posted as part of the schedule of fees.
- 08.03 In some circumstances, a support worker may be required to agree to rules or requirements that are specific to the kinds of goods, services or facilities provided by the City of Pickering. Where confidentiality is required because of the type of information being discussed, City staff may require the support person to sign a confidentiality agreement. City staff should consult Legal Services for assistance in drafting such an agreement.
- 08.04 The City of Pickering may require a person with a disability to be accompanied by a support person when on City of Pickering premises, but only if a support

person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises.

City staff should consider whether they should require the attendance of a support person in the following situations:

- a) when there is a significant risk to the health and safety of the person with a disability or others. The mere possibility of risk is insufficient;
- b) that risk is greater than the risk associated with other customers and that risk cannot be eliminated;
- c) the assessment of the risk is based on consideration of the duration of the risk, the nature, and severity of the potential harm, the likelihood that the potential harm will occur, and the imminence of the potential harm; and
- d) the assessment of the risk is based on the individual's actual characteristics, rather than on generalizations, misperceptions, ignorance or fears about a disability.

09 Assistive Devices

09.01 **Assistive devices** - Includes specialized aids and devices that enable people with disabilities to carry out their everyday activities. These include, but are not limited to, wheelchairs, hearing aids, adaptive computer technologies, ventilators, walkers, crutches and Includes specialized aids and devised that enable people with disabilities to carry out their everyday activities. These include, but are not limited to, wheelchairs, hearing aids, adaptive computer technologies, ventilators, walkers, crutches and includes specialized personal sound amplification devices. The City will make reasonable efforts to ensure that assistive devices can be used to access services.

09.02 **Assistive Listening Devices** - Are available to the public for use at public meetings. This device can only be used in the Council Chambers. The availability of Assistive Listening Devices is also included as a resource on our Accessible Pickering website page, along with our promotional material. Assistive Listening Devices are provided with portable or temporary sound systems when a participant in the function has requested that a device be made available, and it is technically feasible to provide the device within a reasonable cost. Any expenses incurred to meet the request will be the responsibility of the department of division organizing the function. Three days' notice to the Clerk's Office is required.

09.03 **TTY** - Alternative service channel for the hearing impaired. The TTY line is available at the Customer Care Centre. The TTY line is promoted on print material and on the City website. Instructions on its use are located with the TTY, in the City Directory and on the intranet.

10 Training

10.01 We are committed to training all 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, we will train:

- a) all persons who participate in developing the organization's policies; and
- b) all other persons who provide goods, services or facilities on behalf of the organization.

10.02 Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

- purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards
- our policies related to the Customer Service Standards
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities

10.03 We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

10.04 We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

11 Feedback

- 11.01 The City of Pickering welcomes feedback to help identify opportunities for continuous improvement, and to respond to concerns. Through the City's Customer Feedback process, any individual will have the opportunity to submit feedback.

Our process for receiving and responding to feedback is accessible to persons with disabilities upon request. We communicate with people with disabilities in ways that take into account their disability. Individuals may provide feedback in person (orally), by telephone, in writing, or electronically by email, texting or live chat. We will work people with disabilities to determine what method of communication works best for them.

Customer Service Policy ADM 160 sets out standards and procedures to meet our customer service objectives, and outlines the process for receiving feedback and resolving issues.

- 11.02 The City of Pickering provides information about our organization and its services, including public safety information and:

- meets internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.
- notifies the public that documents/information is available upon request by posting notices on the City's website, on published documents, and through staff who deal with the public in-person.
- ensures our feedback process is accessible to people with disabilities by providing or arranging for tailored accessible formats and communication supports, on request.
- consults with the person making the request to determine the suitability of the format or communication support.
- provides the accessible format or communication support upon request in a timely manner and, at no additional cost.

Through consultation with the person making the request the City will determine the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

- an explanation as to why the information or communications are unconvertible; and
- a summary of the unconvertible information or communications.

12 Emergency Preparedness

12.01 The Fire Services Department is responsible for Emergency Preparedness ensuring our community emergency planning and response activities incorporate emergency management practices that have the greatest impact on the needs of people with disabilities. This includes but is not limited to:

- notification
- evacuation
- emergency transportation
- sheltering
- access to medications, refrigeration, and back-up power
- access to their mobility devices or service animals while in transit or at shelters
- access to information

Refer to the Community Emergency Preparedness Plan.