



Section: Corporate	Number:	Council Approved:
Corporate Accessibility Policy		December 21, 2022
Reviewed by Huron County Accessibility Advisory Committee November 14, 2022		

**Statement of Organizational Commitment**

The County of Huron is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario’s accessibility laws.

**Policy Statement**

The County of Huron is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

The County of Huron 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 County of Huron is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities. Our 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 County 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 all of the key areas listed above, the AODA requires the County to:

- identify, prevent and remove barriers people with disabilities face in accessing the County’s goods, services, and facilities

- accommodate the accessibility needs of people with disabilities to ensure they can obtain, use or benefit from municipal 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 municipal employees on providing accessible goods, services, and facilities.

### **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.

### **Scope**

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

## **1. 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 that are 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.

**County** means the County of Huron.

**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 one of the following regulated health professional confirming that the person requires the animal for reasons relating to the 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.

**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.

### **General Standards**

The County of Huron is a designated public sector organization under the AODA and is committed to meeting the accessibility needs of people with disabilities.

### **Huron County Accessibility Advisory Committee**

The County of Huron has established the Huron County Accessibility Advisory Committee (HCAAC) with a majority of members of the Committee whom are persons with disabilities. The HCAAC advises Council about the requirements and implementation of the AODA accessibility standards, preparation of accessibility reports, including access for persons with disabilities to a building or premises, and other matters for which Council may seek advice.

### **Accessibility Policies**

The County 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 County to maintain one or more policies governing how the organization will achieve the requirements of the IASR. The County 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 and Annual Accessibility Plan**

The AODA requires the County to 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 must be developed in consultation with the Accessibility Advisory Committee and people with disabilities. The County of Huron has created an Annual Accessibility Plan under the Ontarians with Disabilities Act 2001 and a Multi-Year Accessibility Plan update under the Accessibility for Ontarians with Disabilities Act 2005, with annual updates on successes. The County of Huron has completed both requirements with the documents approved by Huron County Council. The Plan is posted on the County 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, the County 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 the County of Huron Procurement of Goods and Service Policy.

## **2. Training**

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

The County of Huron is 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
- 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.

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

## **3. Assistive Devices**

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

We ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services or facilities.

#### **4. Communication**

We communicate with people with disabilities in ways that take into account their disability. This may include the following:

We will work with the person with disabilities to determine what method of communication works for them.

#### **5. Service Animals**

The County of Huron 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 we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form) 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.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded
- discuss with the customer another way of providing goods, services or facilities

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 County goods or services without the animal. In addition, County employees will, upon request, consider alternate accommodations for the person in such circumstances. The County 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.

## **6. Support Persons**

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

If a fee or fare is normally charged to a customer for accessing your goods, services or facilities, choose one of the following options:

Fee/fare will not be charged for support persons.

We notify customers of this by posting a notice.

In certain cases, the County might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- the person with a disability
- others on the premises

Before making a decision, the County will:

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

If The County determines that a support person is required, we will waive the admission fee or fare (if applicable) for the support person.

## **7. Notice of Temporary Disruption**

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

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities the County of Huron will make reasonable efforts to notify customers promptly. This clearly posted notice will include information about the reason for the



disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

Services/Facilities include: All County Facilities

List Services/Facilities: All County Services

The notice will be made publicly available in the following ways:

Posting at facility, posting on Corporate website.

## 8. Feedback Process

The County of Huron welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Feedback may be provided in the following ways:

a) By mail addressed to:

County Clerk, 1 Courthouse Square, Goderich, Ontario N7A 1M2

b) By telephone: 519-524-8394

c) In person at: 1 Courthouse Square, Goderich, Ontario N7A 1M2

d) By email at: [huronadmin@huroncounty.ca](mailto:huronadmin@huroncounty.ca)

e) By Website Form at: [www.countyofhuron.ca](http://www.countyofhuron.ca)

The Feedback form is part of the County's Accessibility Standards for Customer Service and is available on the County website. The County ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request. All feedback, including complaints, will be handled in the following manner

All feedback on accessible customer service, regardless of how it is received, should be directed initially to the Clerk or designate for the feedback to be reviewed and identified as a complaint, suggestion or compliment;

- The Clerk or designate will maintain a record outlining the details, follow-up and actions to be taken;
- If the feedback form indicates that the customer wishes to be contacted, the Clerk or designate will acknowledge receipt of the feedback within 5 business days;
- Where possible, complaints will be acknowledged and addressed immediately;
- The Clerk or designate will forward feedback to appropriate Director/Manager;
- The Director/Manager will determine appropriate action;
- The Director/Manager will review barriers identified in feedback and determine if it is feasible to remedy the barrier;
- The Director/Manager will advise the Clerk or designate of the decision and reasons for it;
- The Clerk 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 Manager/Director or designate, the complainant has the option of presenting the concern to Huron County Council for final disposition.

The County of Huron ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

## **9. Notice of Availability of Documents**

The County of Huron notifies the public that documents related to accessible customer service, are available upon request by posting a notice on the County's website [www.huroncounty.ca](http://www.huroncounty.ca). The County of Huron will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

## **10. Self-service Kiosks**

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

## **11. Procurement**

We incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, including self-service kiosks. If it is not possible and practical to do so, we will provide an explanation upon request.

## **12. Information and Communications**

We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

We communicate with people with disabilities in ways that take into account their disability.

When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) in a timely manner, taking into account the person's accessibility needs due to disability; and
- b) at a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining 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:

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

We notify the public about the availability of accessible formats and communication supports by posting a notice on the County website [www.huroncounty.ca](http://www.huroncounty.ca).

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

### **13. Employment**

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We 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. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee's job; and
- b) information that is generally available to employees in the workplace

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization;
- b) when the employee's overall accommodations needs or plans are reviewed; and

c) when the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.

#### **14. Design of Public Spaces**

We will meet accessibility laws when building or making major changes to public spaces. Our public spaces include:

- Recreational trails/beach access routes
- Outdoor public eating areas like rest stops or picnic areas
- Outdoor play spaces, like playgrounds in provincial parks and local communities
- Accessible off-street parking
- Accessible on-street parking

Service-related elements like service counters, fixed queueing lines and waiting areas We put procedures in place to prevent service disruptions to the accessible parts of our public spaces.

#### **15. Changes to Existing Policies**

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

This document is publicly available. Accessible formats are available upon request.