

## AODA – Integrated Accessibility Standards Regulation (IASR) Customer Service Policy

(Note: This policy has been updated to reflect the July 1, 2018, changes to the regulations under Ontario's Health Protection and Promotion Act.)

### Intent

All goods and services provided by the Township of South Algonquin will follow the principles of dignity, independence, integration, and equal opportunity.

This policy meets the requirements of the customer service standards included in the Integrated Accessibility Standards Regulation under the Accessibility for Ontarians with Disabilities Act, 2005. It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

### Definitions

**Assistive device:** A technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them, such as a wheelchair, walker, or a personal oxygen tank, and that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.

**Disability:** As defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, refers to:

- 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;
- A condition of mental impairment or a developmental disability;
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

**Guide dog:** A highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the Blind Persons' Rights Act, to provide mobility, safety, and increased independence for people who are blind.

Service animal: A service animal for a person with a disability if:

1. 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
2. The person provides documentation from a member of one of the following regulated health professional colleges confirming that the person requires the animal for reasons relating to the disability:
  - 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; or
  - College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support person: In relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

## Guidelines

### The Provision of Goods and Services to Persons with Disabilities

The Township of South Algonquin will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring that all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services, as long as this does not present a health and safety risk;

- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual accommodation needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

## The Use of Assistive Devices

### Customer's Own Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the company.

In cases where the assistive device presents a health and safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services, up to the point of undue hardship.

For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a resident with an oxygen tank might involve ensuring the resident is in a location that would be considered safe for both the resident and township.

Alternatively, where elevators are not present and where a resident requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

### Assistive Devices Provided by Township of South Algonquin

none

### Guide Dogs and Service Animals

A resident with a disability who is accompanied by a guide dog or service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs or service animals.

Staff may respectfully ask if an animal is a service animal and will not ask the nature of the person's disability or purpose of the animal.

### Food Service Areas

A resident with a disability who is accompanied by guide dog or service animal will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are only permitted into areas where food is served, sold, or offered for sale due to the Health Protection and Promotion Act, Ontario Regulation 493/17.

### Exclusion Guidelines

If a resident's guide dog or service animal is excluded by law (see applicable laws below), The Township of South Algonquin will offer alternative methods to enable the person with a disability to access goods and services, when possible. For example, the company might accommodate a customer's disability by securing the animal in a safe location and offering the assistance of an employee to facilitate the delivery of goods and services.

### Applicable Laws

Food Safety and Quality Act, 2001, Ontario Regulation 31/05: Animals not intended for slaughter or to be euthanized are not allowed in any area or room of a meat plant. An exception is made for service dogs to allow them in those areas of a meat plant where food is served, sold, or offered for sale to customers and in those areas that do not contain animals or animal parts and are not used for the receiving, processing, packaging, labelling, shipping, handling, or storing of animals or parts of animals.

Dog Owners' Liability Act, 2005: If there is a conflict between a provision of this legislation or of a regulation under this or any other act relating to banned breeds (such as pit bulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails. Staff will respectfully explain that the service animal must be removed from the public area due to a municipal by-law and make alternate arrangements or provide the service outside the public area.

### Recognizing a Guide Dog or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to their disability, the Township of South Algonquin may request verification from the customer.

### Care and Control of the Animal:

The customer who is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all times.

### Allergies and Other Health and Safety Concerns

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, the Township of South Algonquin will make all reasonable efforts to meet the needs of all individuals. Pursuant to the company's obligations under the

Human Rights Code and the Occupational Health and Safety Act, each customer's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

Due diligence needs to be paid to address health and safety requirements. For example, if a person's health and safety could be seriously affected by the presence of a service animal on the premises open to the public, management must fully analyze all options for safely accommodating the service animal. Options could include creating distance between the two individuals to eliminate in-person contact, changing the time the two individuals receive service, or using air purifiers and other measures that could allow the person to use their service animal on the premises.

In very exceptional circumstances where a service animal becomes out of control, causing a clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises.

As a courtesy, particularly if the person and service animal have been in attendance on the premises for a long time, staff may ask whether the animal requires water, may designate an area in which the service animal can relieve itself, or ask whether the staff can be of assistance pertaining to the service animal.

### The Use of Support Persons

If a resident with a disability is accompanied by a support person, the Township of South Algonquin will ensure that both persons may enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the resident and support person from sitting beside each other. In these situations, the township will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the resident before any potentially confidential information is mentioned.

### Admission Fees

Where the township requires a support person to accompany a person with a disability, and where the person with a disability has agreed to the accompaniment, the township will not charge the support person any fees or fares.

### Notice of Disruptions in Service

Service disruptions may occur for reasons that may or may not be within the control or knowledge of the Township of South Algonquin. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or

use goods or services, reasonable efforts will be made to provide advance notice. In some circumstances, such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

If a notification needs to be posted, the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

#### Notification Options

When disruptions occur, Township of South Algonquin will provide notice by:

- Posting notices in conspicuous places, including at the point of disruption, at the main entrance, and the nearest accessible entrance to the service disruption, or on the company website;
- Contacting customers with appointments;
- Verbally notifying customers when they make a reservation or appointment; or
- By any other method that may be reasonable under the circumstances.

#### Resident Feedback

The Township of South Algonquin shall provide customers with the opportunity to provide feedback on the service provided to residents with disabilities. Information about the feedback process will be readily available to all residents and notice of the process will be made available on the township website. Feedback forms, along with alternate methods of providing feedback verbally (in person or by telephone) or written (handwritten, delivered, website, or e-mail), will be available upon request.

#### Submitting Feedback

Customers can submit feedback to:

Bryan Martin, CAO/Clerk-Treasurer

7 Third Ave.

Whitney, Ont.

K0J 2M0

phone 613-637-2650

email [clerk@southalgonquin.ca](mailto:clerk@southalgonquin.ca)

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Township of South Algonquin employee.

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

## Training

Training will be provided to:

- Every employee of or a volunteer with the Township of South Algonquin;
- Every person who participates in developing the policies of Township of South Algonquin; and
- Every other person who provides goods, services, or facilities on behalf of Township of South Algonquin.

## Training Provisions

Regardless of the format, training will cover the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005;
- A review of the requirements of the customer service standards;
- Instructions on how to interact and communicate with people with various types of disabilities;
- Instructions on how to interact with people with disabilities who:
  - Use assistive devices;
  - Require the assistance of a guide dog or other service animal; or
  - Require the use of a support person (including the handling of admission fees);

- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities;
- Instructions on what to do if a person with a disability is having difficulty accessing our services; and
- Policies, procedures, and practices of the Township pertaining to providing accessible customer service to customers with disabilities.

### Training Schedule

Township of South Algonquin will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents, and contractors during orientation. Revised training will be provided in the event of changes to legislation, procedures, policies, or practices.

### Record of Training

Township of South Algonquin will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

### Notice of Availability and Format of Documents to Customers

(Note: This section only applies to businesses with 50 or more employees)

### Administration

If you have any questions or concerns about this policy or its related procedures, please contact:

Bryan Martin, CAO/Clerk-Treasurer

7 Third Ave.

Whitney, Ont.

K0J 2M0

phone 613-637-2650

email [clerk@southalgonquin.ca](mailto:clerk@southalgonquin.ca)

This policy and its related procedures will be reviewed as required in the event of legislative changes or changes to company procedures.



## Human Rights Policy - Ontario

### Intent

The Township of South Algonquin is committed to providing equal treatment with respect to employment according to the protected grounds established under the Ontario Human Rights Code. The Township of South Algonquin has adopted this policy to ensure that our employees are provided with meaningful employment that is ethical and fair, and is in compliance with all applicable employment, and human rights legislation.

### Definitions

**Discrimination:** any form of unequal treatment based on a Code ground, whether imposing extra burdens or denying benefits. It may be intentional or unintentional. It may involve direct actions that are discriminatory on their race, or it may involve rules, practices or procedures that appear neutral, but have the effect of disadvantaging certain groups of people. Discrimination may take obvious forms, or it may occur in very subtle ways. In any case, even if there are many factors affecting a decision or action, if discrimination is one factor, then it is a violation of this Policy.

### Guidelines

Our Human Rights Policy is in place to ensure we provide a working environment for all employees that fosters openness and tolerance. This policy is intended to ensure that Township of South Algonquin's practices and the practices of all our employees are free from direct and indirect discrimination. Under the Human Rights Code, employers have the ultimate responsibility for ensuring a healthy and inclusive work environment, including preventing and addressing discrimination and harassment. Prohibited Grounds of Discrimination

The following is a list of the prohibited grounds of discrimination in Ontario:

- Age
- Ancestry
- Citizenship
- Colour
- Creed
- Disability (mental or physical)
- Ethnic origin

- Family status
- Gender expression
- Gender identity
- Marital status
- Place of origin
- Race/colour
- Record of offences
- Sex
- Sexual orientation

#### Accessibility in Employment

The Township of South Algonquin is committed to providing accessibility across all stages of the employment cycle, by removing barriers and creating a workplace that is accessible to all job candidates and employees. Any applicant to Township of South Algonquin that communicates the need for accommodation shall be considered in a manner that is non-discriminatory, and respectful of our human rights obligations.

#### Accommodation

The Township of South Algonquin will support the accommodation of employees and job applicants who require workplace accommodation under any of the grounds described in the Human Rights Code. We will work to achieve a workplace free of barriers by providing accommodation for the needs of those individuals covered by the Code, up to the point where it causes undue hardship for the Township of South Algonquin. Every effort will be made such that the impact of accommodation will not discriminate against another group protected by the Code. The Township of South Algonquin shall provide accommodation as appropriate, using a consultative approach that involves the company, the individual, and as appropriate, healthcare professionals, and other third parties that are required to assist in the accommodation process. The Township of South Algonquin will work with the individual that requests accommodation in an effort to ensure that the measures taken are both effective and mutually agreeable. The Township of South Algonquin encourages individuals to make any needs for accommodation known to their immediate supervisor, and to work with them in addressing the issue. Accommodation may be temporary, or permanent, based on the requirements of the individual.

#### Accommodation Plans

Any employee requesting accommodation must make a request to their immediate supervisor. The Department Head is responsible for ensuring that a written description of the accommodation plan is prepared for any employee. The Township of South Algonquin shall create an accommodation plan and attempt to determine methods of achieving the requirements for success in the position in alternative manners. In the creation of an accommodation plan, The Township of South Algonquin shall:

1. Identify the need for accommodation.
2. Determine objectives for performance in the role, and potential barriers.
3. Create a plan for achieving the objectives in an alternative manner.
4. Examine the options for accommodation, and select the most appropriate avenue for accommodation.
5. Implement the accommodation process.
6. Provide training as appropriate.
7. Review and revise based on feedback.

#### Investment in Materials

Where the accommodation required necessitates an investment in materials, equipment or increased budget for the position, requests for financing must be directed to the CAO.

#### Job Redesign

In the event that the accommodation requires a substantial change in the position, involving duties or hours, the position may be redesigned.

#### Complaint

In the event that the employee requesting accommodation feels that their needs have not been met in a reasonable manner, they may file a written complaint. The complaint must be submitted to CAO.

#### Religious Accommodation

The Township of South Algonquin is committed to respecting the religious beliefs and practices of all employees. The Township of South Algonquin will strive to accommodate employees who must be absent from work for all or part of a regularly scheduled working day due to a bona fide religious obligation. Township of South Algonquin employees who require religious accommodation are directed to provide as

much advance notice as is possible, and we will strive to provide the required time off through the normal scheduling of work.

### Dress Code

Township of South Algonquin shall strive to allow for religious accommodation where the accommodation does not conflict with established Health and Safety Policies, or where the work uniforms can be modified easily to permit the person concerned to wear the required item(s) of clothing. Clothing or gear with a health or safety rationale may constitute a reasonable occupational requirement.

### Break Policy

The Township of South Algonquin recognizes that some religions require the observation of prayer periods at specific times. While this requirement may create a conflict with standard hours of operations, the Township of South Algonquin shall work to accommodate the employee's needs, short of undue hardship. Where possible, the Township of South Algonquin shall allow for a modified schedule for breaks.

### Inability to Accommodate

In the event an employee cannot be accommodated in their current position it will be reasonable to accommodate an individual in another position. Management will attempt to place the employee in another available position. This may require the assistance of third parties with specialized expertise. Where an employee is placed in an alternate position, the Township of South Algonquin shall ensure that the employee:

- Has the requisite qualifications and skill-sets necessary for success in the position;
- Is capable of performing the tasks associated with the position; and
- Agrees that the alternate work is acceptable.

In the event that the employee requesting accommodation feels that their needs have not been met in a reasonable manner, they may file a written complaint to the CAO.

### Undue Hardship

The Township of South Algonquin shall work to provide workplace accommodation up to the point of undue hardship. Undue hardship may occur where all options have been considered and it is established that no forms of appropriate accommodation exist, or where the creation of accommodation would cause excessive costs that create undue hardship for the organization, or where the accommodation would create a health and safety hazard. Where the provision of accommodation is found to cause undue hardship on the organization, the Township of South Algonquin shall work to find a fair and

equitable compromise that meets the needs of the employee and the organization to the greatest extent possible.

### Reporting a Human Rights Issue

While the Township of South Algonquin will ensure to adhere to following the Human Rights Code in all of its practices, it is essential that employees adhere to the Code as well. In the event that any employee feels they are being discriminated against or that the company is in violation of the Code, they may make a written complaint to CAO. The written complaint must include the following information:

- The date and time of each incident you wish to report;
- The name of the person(s) involved in the incident(s);
- The name of any person or persons who witnessed the incident(s); and
- A full description of what occurred.

### Investigation

Once a written complaint has been received, the Township of South Algonquin will complete a thorough investigation. If it is determined discrimination (or another violation of the Code) has occurred, appropriate disciplinary measures will be taken immediately.

### Confidentiality

All records of direct and indirect discrimination and harassment, reports filed, and subsequent investigations are considered confidential and will not be disclosed to anyone except to the extent required by law.

### False or Frivolous Complaints

It is important to realize that unfounded/frivolous allegations of discrimination may cause both the accused person and the company significant damage. If it is determined by the company that any employee has knowingly made false statements regarding an allegation of discrimination, immediate disciplinary action will be taken. As with any case of dishonesty, disciplinary action may include immediate dismissal without further notice.