



SUBJECT: ACCESSIBILITY - INTEGRATED ACCESSIBILITY
STANDARDS - REGULATION 191/11 (AODA 2005)
POLICY

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PURPOSE

The purpose of this policy is to facilitate the Innisfil ideaLAB & Library's regulatory compliance with the Integrated Accessibility Standards Regulation (O. Reg. 191/11) of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and all policy requirements under the Regulation. The AODA and its Regulations indicate that failure to comply with the requirements set out in the Act and Regulations may result in administrative penalties for the obligated organization.

This policy outlines the Library's commitment to providing unhindered access to all users, as well as the overall strategic direction that the Library will follow in the identification, removal, and prevention of barriers to ensure consistent opportunity and access to the Library's goods, services, and facilities.

POLICY

General

Statement of Organizational Commitment

The Innisfil Public Library Board establishes and implements practices and procedures that respect the dignity and independence of persons with disabilities. The Library is committed to ensuring that each employee, volunteer and customer receives equitable treatment with respect to employment and services without discrimination, and receives accommodation where required, in a timely manner, to the point of undue hardship and in accordance with the Ontario Human Rights Code and the AODA and its regulations.

The Innisfil Public Library Board is committed to providing persons with disabilities consistent opportunity and access to the Library's goods, services, and facilities. The Library will ensure that policies, procedures, and practices are provided in a manner that is timely and guided by the principles of integration, independence, dignity, and equal opportunity.

When communicating with a person with a disability, Library Staff will do so in a manner that takes into account the person's disability. The Library will endeavor to follow the compliance schedule of the legislation when implementing each of the requirements addressed in this policy.

Background

Effective July 1st, 2016, Ontario Regulation 429/07 - Accessibility Standards for Customer Service, and Ontario Regulation 191/11 – Integrated Accessibility Standards (Information and Communication, Employment, Transportation and Design of Public Spaces), were consolidated into a single Integrated Accessibility Standards Regulation through amendments contained in Ontario Regulation 165/16.

Application

This Policy applies to all Library employees, including full-time, part-time, student, co-op, or contract service employees, Board Members and volunteers, who work in the Library or in library owned or controlled offices, facilities and work sites, and as such also applies to all Library Branch facilities.

Definitions

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.

Barrier means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. This includes physical, architectural, information or communication, attitudinal or technological barriers, a policy or a practice.

Communication Support may include, but is not limited to, captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

Disability means, as per the Human Rights Code:

- 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 coordination, blindness or visual impediment, deafness or hearing impairment, 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 a 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 means a dog trained as a guide for a person who is visually impaired and having the qualifications prescribed by the regulations in the Blind Persons' Rights Act.

Kiosk means 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.

Library means Innisfil Public Library Board.

Planned Service Disruption means a scheduled shutdown or closure of a Library facility, program or service which may result in a reduction or change to a service level.

Support Person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs with access to goods, services or facilities.

Service Animal is an animal for a person with a disability, if

- a) 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
- b) The person provides documentation from a regulated health professional as indicated in the *Integrated Accessibility Standards Regulation*, which confirms that the person requires the animal for reasons relating to the disability.

Guidelines

1.0 Responsibility

It is the responsibility of the Innisfil Public Library Board and all Library employees to ensure that this policy is adhered to and that the practices of the Library demonstrate a commitment to accessibility as outlined in this policy and accessibility legislation.

2.0 Application

2.1. Accessibility Plans

The Library will establish, implement, maintain, and document a Multi-Year Accessibility Plan that will outline its strategy to prevent and remove barriers to persons with disabilities and meet the requirements under accessibility legislation. The plan will be established in consultation with the *Innisfil Accessibility Advisory Committee*. Members of the public, including those living with disabilities, will be encouraged to provide input into the plan. The Innisfil Public Library Board will review and approve the plan.

At least once every five years, the Library will review and update the Accessibility Plan following the same public consultation and approval process as outlined for the initial development of the plan.

Status reports will be presented to the Library Board and the *Innisfil Accessibility Advisory Committee*. The report will outline the progress of measures taken to implement the plan and the Library's strategy to identify, prevent, and remove barriers to those with disabilities.

The Library will make all accessibility plans and annual status reports available to the public. All plans and reports will be posted on the Library's website and made available at library facilities. The Library will provide the documents in an accessible format, upon request.

2.2. Procuring or Acquiring Goods, Services or Facilities

The Library will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except when it is not practicable to do so.

The Library will provide an explanation, upon request, when it has not been practicable to incorporate accessibility features.

2.3. Self-Service Kiosks

The Library shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

2.4. Training

The Library will ensure that training is provided on the requirements of accessibility standards, the purpose of the Act, and on the Human Rights Code as it pertains to persons with disabilities.

Such training will be provided to:

- All paid employees, Library Board Members, and Long Term Volunteers (See the Volunteer Policy);
- All persons who participate in developing Library policies; and

The training will also review the requirements of the Customer Service Standards, and instruction about the following:

- How to interact and communicate with persons with various types of disabilities;
- How to interact with a person with a disability/disabilities, who uses an assistive device or requires the assistance of a guide dog or other service animal, or the assistance of a support person;
- How to use equipment or devices available on the service provider's premises or otherwise provided by the service provider that may help with the provision of goods, services or facilities to a person with a disability;
- What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.

The specified training and information will be provided to each person to whom this policy applies as soon as is practicable, as well as on an ongoing basis in respect to any changes to the Library's policies, procedures and practices governing the provision of goods, services, and facilities to persons with disabilities.

A record of the training provided, the date of the training and the recipients will be maintained. The names of individuals trained will be recorded for training administration purposes, subject to the *Municipal Freedom of Information and Protection of Privacy Act*.

2.5. Feedback

The Library will ensure that the processes for receiving and responding to feedback are accessible to persons with disabilities. The public will be notified of the availability of accessible formats and communications support by including notice on the Library's website, on Library premises and other appropriate locations. Upon request, accessible formats or communication supports will be provided or arranged.

2.6. Accessible Formats and Communication Supports

Upon request, the Library will provide, or arrange for the provision of, accessible formats or communication supports for persons with disabilities.

These accessible formats and communication supports will be provided in a timely manner and in a way that takes into account the individual's accessibility needs due to disability. The Library will consult with the person making the request to determine the suitability of an accessible format or communication support. Such accessible documents and communication supports will be provided at a cost no greater than the regular cost charged to others.

The Library will notify the public about the availability of accessible formats and communication supports, upon request, by including a notice on its website and on many of the documents produced by the Library. If a document, or portions of a document, cannot be converted into an accessible format, the Library will provide an explanation or summary of such information in an accessible format.

2.7. Emergency Procedure, Plan or Public Safety Information

The Library will, upon request, provide emergency procedures, plans and public safety information in an accessible format or with communication support, as soon as is practicable.

2.8. Accessible Websites and Web Content

The Library will ensure that its publicly accessible Internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA.

2.9. Recruitment, Assessment and Selection

The Library is committed to equitable consideration of candidates during the recruitment, assessment and selection process. All job applicants will be notified of the availability of accommodations for persons with disabilities in the employment application process.

Individuals selected to participate in assessment or selection processes, such as an interview or testing, will be notified of the availability of accommodation, upon request, during such an assessment or selection process. In cases where accommodations due to disability are requested, the Library will consult with the individual and provide or arrange for suitable accommodations in a manner that takes into account the applicant's disability needs. Accommodations will be provided with respect to the materials or processes used in recruitment.

When making offers of employment, the Library will notify the successful applicant of its policies for accommodating employees with disabilities. This notification will be provided verbally at the time of offer and in the Offer of Employment letter.

2.10. Informing Employees of Supports

The Library will inform employees of its policies, and any updates to such policies, used to support employees with disabilities. The Library will provide this information to new employees as soon as practicable after commencing employment. This includes policies on providing job accommodations that take into account the employee's accessibility needs due to disability.

2.11. Accessible Formats and Communication Supports for Employees

The Library will, when requested by an employee living with a disability, consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is required in order to perform the job, as well as information that is generally available to employees in the workplace.

The Library will consult with the employee making the request in determining the suitability of an accessible format or communication support.

2.12. Workplace Emergency Response Information

The Library is committed to ensuring the safety of its employees. Individualized workplace emergency response information will be provided to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the employee's need. This information will be provided as soon as practicable after the Library becomes aware of the need for accommodation.

When an employee requires assistance in an emergency, the Library will, with the employee's consent, provide such information to the person designated by the Library to provide assistance.

The Library will review the individualized workplace emergency response information when an employee moves to a different location within the organization, when the employee's overall accommodation needs and plans are reviewed, and when the Library reviews its general emergency policies.

2.13. Documented Individual Accommodation Plans

The Library will develop a written process for the development of documented individual accommodation plans for employees with disabilities. The individual accommodation plan will include:

If requested, any information regarding accessible formats and communication supports provided to the employee;

- If required, individualized workplace emergency response information; and
- Any other accommodations which are to be provided.

2.14. Return to Work Process

The Library will maintain a documented return to work process for employees with a disability and who require disability-related accommodation in order to return to work.

The Library's return to work process will outline the steps the Library will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (i.e., the Workplace Safety Insurance Act, 1997).

2.15. Performance Management, Career Development and Advancement, and Redeployment

The Library will take into account the accessibility needs of employees with disabilities and any individual accommodation plans when providing any performance management, career development, and advancement.

In the event of redeployment (reassigning employees to other branches or service area jobs within the Library as an alternative to layoff when a particular job or service area has been eliminated), the Library will also take into account the employee's accessibility needs due to disability and any individual accommodation plan.

2.16. Use of Service Animals

Persons with disabilities may enter premises owned and/or operated by the Library Board accompanied by their service animal and keep that animal with them in areas/premises that are open to the public, when accessing goods, services and facilities provided by the Library, unless the animal is otherwise excluded by legislation (see non-exhaustive list of such legislation under References and Related Documents).

In the event that a service animal is otherwise prohibited by law from the premises, the Library will ensure that alternate means are available to enable the person with a disability to obtain, use or benefit from the Library's goods and services and facilities.

Where it is not readily apparent that an animal is a Service Animal, Library Staff may ask for verification by asking to see a letter from a physician, nurse, or an identification card from the Ministry of the Attorney General, as per legislated guidelines.

Service animals must be supervised by their owners and be kept in control at all times.

2.17. Use of Support Persons

Persons with disabilities are permitted to be accompanied by their support person in areas/premises that are open to the public when accessing goods, services and facilities provided by the Library.

If a person with a disability is accompanied by a support person, the provider of goods, services or facilities, 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.

The Library may require a person with a disability to be accompanied by a support person while using library premises in situations where it 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 if there is no other reasonable way to protect the health or safety of the person with a disability or the health or safety of others on the premises. The Library will consult with the person with a disability and consider the available evidence to determine if the person with a disability is required to be accompanied by a support person.

A support person, when assisting a person with a disability to obtain, use or benefit from the Library's goods, services, or facilities, will be permitted to attend at no charge where an admission fee is applicable; however, where it is beyond the control of the Library Board to waive the fee, advance notice of the fee will be provided. In situations where the Library requires a person with a disability to be accompanied by a support person, any fee or payment will be waived with respect to the support person's admission to the premises or in connection with the support person's presence on the premises.

2.18. Notice of Service Disruptions

In the event of a planned service disruption to goods, services, facilities, or systems, the Library will provide notice of the disruption in advance. In the event of an unexpected disruption, the Library will provide notice as soon as possible.

The notice will include information about the reason for the disruption, its anticipated duration and a description of alternative goods, services, facilities, or systems that may be available.

Notice may be given by posting the information in visible places, or on the Library's website (www.innisfilidealab.ca) or by such other method or means as is reasonable under the circumstances.

2.19. Customer Feedback

In an effort to improve on the provision of library goods and services to persons with disabilities, feedback from the public is welcomed. To assist with the collection of feedback, the Library will maintain a feedback form and will also accept comments in any form (in person, electronic format, written, etc.). All feedback will be logged, and all questions and concerns will be acknowledged within a maximum of two (2) business days from the date of receipt. Response time to the feedback will depend on the issue, but will not exceed fifteen (15) business days unless there are extenuating circumstances. In this case, individuals will be notified that there will be a delay in receiving a response.

Complaints regarding accessibility issues, collected through the feedback process, will be provided to the Innisfil Accessibility Advisory Committee (I.A.A.C) subject to the *Municipal Freedom of Information and Protection of Privacy Act*, for review and discussion. The Committee will then forward its recommendations to the CEO for consideration.

Information on the feedback process will be readily available to the public through postings on library premises, the library website and other appropriate locations.

2.20. Notification of the Availability and Format of Documents

The Library shall notify the public that the documents required by the Integrated Accessibility Standards (Ontario Regulation 191/11) and the Library's Integrated Accessibility Standard Regulation Policy, procedures, notices of temporary disruptions, training records are available upon request, subject to the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

Notice of the availability of documents may be given by posting the information in conspicuous places owned and/or operated by the Innisfil Public Library Board, the library website and/or any other reasonable method.

When communicating with a person with a disability, the Library will do so in a manner that takes into account the person's disability. The Library and the person with a disability will agree on what format will be used. The document or information will be provided to the person in an accessible format or with communication support in a timely manner and at a cost that is no more than the regular cost charged.

2.21. Public Libraries

In Section 19 of the Integrated Accessibility Standard, Ontario Regulation 191/11, there are requirements that relate specifically to public libraries.

Innisfil Public Library Board:

- Shall provide access to or arrange for the provision of access to accessible materials where they exist;
- Shall make information about the availability of accessible materials publicly available and shall provide the information in an accessible format or with appropriate communication supports, upon request;

- May provide accessible formats for archival materials, special collections, rare books and donations.

3.0 References and Related Documents

- Ontarians with Disabilities Act, 2001;
- Accessibility for Ontarians with Disabilities Act, 2005;
- Ontario Regulation 191/11 – Integrated Accessibility Standards Regulation;
- Ontario Human Rights Code;
- Town of Innisfil Annual Accessibility Plan;
- Innisfil Public Library Accessibility Plan;
- Other Accessibility Standards as approved into Regulation

Appendices

Appendix #1 – Request for Innisfil Public Library Documentation in an Alternate Format Form;

Appendix #2 – Customer Feedback Form;

Appendix #3 – Customer Feedback on Accessibility for Ontarians with Disabilities Form;

Appendix #4 – Record of Customer Service Feedback as per Accessibility for Ontarians with Disabilities Act 2005 Form;

Appendix #5 – Notice of Service Disruption – Planned Form;

Appendix #6 – Notice of Service Disruption – Unexpected Form;

Appendix #7 – AODA Training Record Form.

Related Policies

E-EMPLOYMENT – Accommodation and Return to Work Policy.

Related Procedures

A-2014-02 – AODA 2005 Feedback Process;

A-2014-03 – AODA 2005 Notice of Temporary Disruptions Process;

A-2014-04 – AODA 2005 Training Process;

A-2014-05 – AODA 2005 Accessible Clear Print Guidelines.

Approved by the Innisfil Public Library Board, June 19, 2023, Motion #2023.56

Supersedes Policy #A-2019-16, approved June 17, 2019, Motion #2019.53; and merges and supersedes AODA – Meeting the Requirements of the Regulations Policy #2014-02, approved January 20, 2014, Motion #2014.07 (*Policy **REPEALED** June 17, 2019, Motion #2019.54*); &

Supersedes Integrated Accessibility Standards Regulation Policy #A-2016-15, approved October 17, 2016, Motion #2016.79; &

Merges and supersedes Integrated Accessibility Standards – Regulation 191/11 (AODA 2005) Policy #2012-13, approved December 10, 2012, Motion #2012.85 Final Approval - January 21, 2013, Motion #2013.07; &
Accessibility - Accessible Customer Service Policy #A-2014-18, approved September 15, 2014, Motion #2014.65; &
Policy #2009-12, approved November 16, 2009, Motion #2009.75.