

Grand River Conservation Authority Accessibility Standards Policy



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The Accessibility for Ontarians with Disabilities Act, 2005 has established requirements for accessibility standards in all businesses in Ontario. This policy establishes Customer Service Standards, Information, and Communication Standards, Employment Standards and Design of Public Spaces Standards in accordance with *Integrated Accessibility Standards Regulation, O.Reg.191/11* and the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*, for the Grand River Conservation Authority. The Grand River Conservation Authority (GRCA) is committed to providing exceptional and accessible goods, services and facilities for people with disabilities.

Definitions

Accessible means giving people of all abilities opportunities to participate fully in everyday life; provided in a manner that is capable of being easily understood or appreciated; easy to get to; capable of being reached, or entered; obtainable.

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

Assistive Device is a technical aid, communication device, or medical aid, modified or customized, that is used to increase, maintain, or improve the functional abilities of people 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, 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 by the Accessibility for Ontarians with Disabilities Act, 2005 and the Ontario Human Rights Code, is:

- 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 assistive 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.

Service Animal –an animal is a service animal for a person with a disability if it is readily apparent that the animal is used by the person for reasons relating to his or her disability, or if the person provides a letter from a regulated health professional, including: psychologist, psychotherapist, audiologist, speech-pathologist, chiropractor, nurse, occupational therapist, physician, optometrist, registered psychotherapist and mental health therapist, confirming that the person requires the animal for reasons relating to the disability.

Support Person –a 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 or with access to goods or services.

Integrated Accessibility Standards, O.Reg. 191/11

This policy is intended to meet the requirements of *Ontario Regulation 191/11* under the *Accessibility for Ontarians with Disabilities Act, 2005*. It applies to the provision of goods, services and facilities.

Customer Service Standard

The GRCA aims to ensure that persons with disabilities are given equal opportunity to obtain, use, and benefit from the GRCA's goods, services, and facilities. Reasonable efforts will be made to ensure that the GRCA's goods, services and facilities are provided in a manner that respects the dignity and independence of persons with disabilities. The following principles will apply:

- Goods, services and facilities provided to persons with disabilities will be integrated with the provision of goods, services and facilities to others unless an alternate measure is necessary to allow a person with a disability to benefit from the goods, services and facilities. The alternate measure may be temporary or permanent.
- Communications with a person with a disability will be conducted in a manner that takes into account the person's disability.
- People with disabilities may use assistive devices, service animals, and support persons as is necessary to access the GRCA's goods, services, and facilities. If a service animal is excluded by law from a premise, other measures will be made available for the person with a disability to access the goods, services, and facilities.

Assistive Devices

Persons with disabilities may use their assistive devices as required to access goods, services, and facilities provided by the GRCA.

Service Animals

Persons with disabilities are permitted to be accompanied by their service animal and keep that animal with them in areas that are open to the public, when accessing goods and services provided by the GRCA, unless prohibited by law. In the event of an employee being uncertain of the service animal, the employee may ask to see written documentation from a regulated health professional, including: psychologist, psychotherapist, audiologist, speech-pathologist, chiropractor, nurse, occupational therapist, physician, optometrist, registered psychotherapist, and mental health therapist, validating it as a service animal. The documentation must confirm that the person needs the service animal for reasons relating to their disability.

If a service animal is prohibited from the premises, the GRCA will ensure that other measures are available to enable the person with a disability to obtain, use or benefit from the GRCA's goods, services, and facilities.

The service animal must be supervised by the customer and kept in control when used to access the GRCA's goods, services, and facilities.

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 GRCA. They will not be prevented from having access to each other while on the premises.

Where admission fees for the support person are applicable, such fees or fares for the support person, as applicable, will be waived.

The GRCA may deem it necessary to require a support person for a person with a disability to protect the health and safety of that person or of others on the premises. Before making this decision, the GRCA will:

- Consult with the person with a disability to understand their needs;
- Consider health or safety reasons based on available evidence; and
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

Notice of Service Disruptions Process

In the event of a planned service disruption to facilities and services that are relied upon by people with disabilities to access the GRCA's goods or services, a notice of the disruption shall be provided in advance.

The Notice of Service Disruption will include:

- information about the reason for the disruption;
- its anticipated duration; and,
- a description of alternative facilities and services that may be available (when applicable).
- Notice will be given by posting the information in a conspicuous place on the premises affected by the service disruption, by posting the information on the GRCA's website, or by such other methods as are reasonable under the circumstances. The supervisor or manager of the affected premises in coordination with the GRCA Strategic Communications department will be responsible for identifying the need for posting a notice of service disruption and for its removal following resolution. A link to the summary of service disruptions is available under the accessibility section of the GRCA website at www.grandriver.ca or can be provided by calling 519-621-2761.

In the event of an unexpected disruption, notice will be provided as quickly as possible using the same or similar methods.

Information and Communication Standard

When requested, the GRCA will provide information and communications in an accessible manner to people with disabilities. Alternatives to standard print are often referred to as accessible formats, and ways to help communication between people are referred to as communication supports.

When a request is received, the GRCA will consult with the person to determine their accessibility needs. The GRCA will determine the most appropriate accessible format or communication support depending on the accessibility needs of the person and the capability of our organization to deliver.

Accessible formats and communication supports must be provided in a timely manner and at a cost that is not more than the regular costs charged to other people.

Some examples of accessible formats and communication supports:

- Reading written information to a person directly
- Large print

- Text transcripts of audio or visual information
- Handwritten notes instead of spoken word
- Information written in plain language
- An electronic document formatted to be accessible for use with a screen reader

This requirement does not apply to information or communications that cannot be converted to an accessible format, or that is not controlled directly or indirectly through a contract. When it's not possible to convert the requested material, the GRCA will provide the individual making the request with the following:

- An explanation as to why the information or communications are unconvertible, and
- A summary of the information or communications.

Emergency Information

Emergency procedures, plans, or public safety information prepared by the GRCA and made available to the public shall be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Accessible Websites and Web Content

The GRCA will make every effort to ensure that its website and any new content posted to its website shall conform to Web Content Accessibility Guidelines (WCAG) 2.0, Level AA. Some of the information presented and some of the documents on our website are not fully accessible to people with disabilities due to their complexity (e.g. maps, historical documents, etc.). Accessible formats can be requested in accordance with this policy.

Employment Standard

Recruitment

The GRCA shall notify employees and the public about the availability of accommodation for applicants with disabilities in the GRCA recruitment process.

The GRCA shall notify job applicants when they are selected to participate further in an assessment or selection process at the GRCA, that accommodations are available upon request in relation to the materials or processes to be used in the assessment or selection process. If a selected participant requests an accommodation, the GRCA shall consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.

When making offers of employment, the GRCA shall notify the successful applicant of the GRCA's accommodation policies.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, the GRCA shall consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the employee's job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, the GRCA shall consult with the employee making the request.

The GRCA shall inform its employees of policies to support employees with disabilities, including policies on the provision of job accommodations that consider an employee's accessibility needs due to disability. This information shall be provided to new employees as soon as practicable after their employment commences.

Workplace Emergency Response Information

The GRCA shall provide individualized workplace emergency response information to employees who have a disability if the disability is such that the individualized information is necessary, and if the employee makes the GRCA aware of the need for accommodation due to the employee's disability.

Where an employee requires assistance, the GRCA shall, with the consent of the employee, provide the workplace emergency response information to the person designated by the GRCA to provide assistance to the employee.

When the employee moves to a different work location, when the employee's overall accommodation needs change and when the GRCA reviews its general emergency response policies, the individualized workplace emergency response information will also be reviewed.

Documented Individual Accommodation Plans

The GRCA shall document an Individual Accommodation Plan (IAP) for employees with disabilities, where required. IAPs shall include any information regarding accessible formats and communications supports provided (if requested), individualized workplace emergency response information (if applicable), and shall identify any other accommodation that is to be provided to the employee.

The process for the development of documented IAPs shall include the following elements:

- the manner in which an employee requesting accommodation can participate in the development of the IAP
- the means by which the employee is assessed on an individual basis
- the manner in which GRCA can request an evaluation by an outside medical or other expert, at the GRCA's expense, to assist the GRCA in determining if and how accommodation can be achieved
- the manner in which the employee can request the participation of a representative in the development of the IAP
- the steps taken to protect the privacy of the employee's personal information
- the frequency with which the IAP will be reviewed and updated and the manner in which it will be done
- if an IAP is denied, the manner in which the reasons for the denial will be provided to the employee
- the means of providing the IAP in a format that takes into account the employee's accessibility needs due to disability.

Return to Work Process

The GRCA has a documented return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations to return to work. This process is outlined in Health & Safety Policy #8.4.

Performance Management and Career Development

The GRCA shall take into account the accessibility needs of employees with disabilities, as well as IAPs, when reviewing performance and providing career development and advancement opportunities to employees.

Design of Public Spaces Standard

The GRCA will, except where not practicable to do so, incorporate accessibility design, criteria and features when procuring or acquiring goods, services or facilities that are considered public spaces. The following requirements will be incorporated when building new public spaces or making planned significant alterations to existing public spaces.

Recreational Trails and Beach Access Routes

Consultation & Technical Requirements for Recreational Trails and Beach Access Routes

The GRCA will:

- Where possible, consult in advance with the public and people with disabilities to help determine particular new recreational trail features that affect the intended experience of the trail. Features that must be consulted on include:
 - the trail's slope
 - the need for and location of ramps on the trail, and
 - the need for, location of, and design of rest areas, passing areas, viewing areas, amenities and other features on the trail
- ensure they meet specific technical requirements, including:
 - minimum width and height clearance measurements
 - surface characteristics
 - NOTE: these technical requirements also apply where a boardwalk or ramp to a recreational trail or beach access route is being built or significantly altered.
- ensure that trail heads of recreational trails have signage containing information about the physical characteristics of the trail, including length of the trail, type of surface of which the trail is constructed, average and minimum width, average and minimum running and cross slopes, and location of amenities to help users decide how best to enjoy the trail experience. This information will also be available on the GRCA's website, park brochures, and other communication materials as applicable
- Exceptions: the following are not considered recreational trails and beach routes for the purposes of the Accessibility Standards Policy:
 - wilderness trails
 - areas of trails where modifications for accessibility would negatively impact the ecology or natural heritage and/or have a negative effect on water, fish, wildlife, plants, invertebrates, species at risk or natural hazards
 - cases where the modifications for accessibility would be impossible or inappropriate, such as where rocks bordering the route make it impossible to meet minimum width requirements

Outdoor Public Use Eating Areas

The GRCA will ensure that:

- at least 20% of new outdoor public use tables added, and no fewer than one of the new tables, are accessible to people using mobility aids, such as wheelchairs,
- the ground surface leading to and under the accessible tables is level, firm and stable to accommodate mobility aids, and
- there is adequate clear space around the accessible tables so that people using a mobility aid can approach the tables

Outdoor Play Spaces

The GRCA will:

- consult with the public and people with disabilities to identify the needs of users of new outdoor play spaces on our properties
- ensure they meet the following technical requirements:
 - incorporate accessible play space features for children with various disabilities and their caregivers
 - adequate room for children with various disabilities and their caregivers to move through, in and around the play space
 - ground surface that is firm, stable and able to absorb the shock of a fall

Exterior Paths of Travel

Where the GRCA has paths of travel that are not regulated by Ontario's Building Code, we will ensure that they are in compliance with the standard, as applicable to the type of path. Exterior paths of travel, for the purposes of this policy, do not include paths intended to provide a recreational experience.

Accessible Parking

Where the GRCA provides off-street parking, we will ensure that:

- facilities include two types of accessible parking spaces when two or more accessible spaces are required:
 - a wider space with signage that identifies the space as "van accessible", and
 - a standard-width space
- a minimum number of each type of accessible parking space, depending on the total number of parking spaces, are available, as outlined in the standard.
- Accessible parking spaces have access aisles with a minimum width that provides people with disabilities the space to get in and out of their vehicles
- Each accessible parking space is identified with current signage requirements in Regulation 581 (Accessible Parking for Persons with Disabilities) under the Highway Traffic Act
- Where parking lots are not paved and lines cannot easily be defined, the minimum width requirements will be marked using an alternate method

Obtaining Services

Service Counters

The GRCA will ensure that service counters are accessible by someone sitting in a mobility aid and has enough clear space in front for a person using a mobility aid to approach the counter.

Fixed Queuing Guides

Where new fixed queuing guides are installed, the GRCA will ensure that the queuing area is wide enough for people using mobility aids to move through the line and that, for people who are blind or have low vision, it can be found with a cane.

Waiting Areas (not currently applicable)

Where seating is fixed to the floor in waiting areas, at least three percent, or at least one, of the seating spaces will be accessible.

Preventative and Emergency Maintenance

The GRCA conducts inspections for preventative maintenance of designated accessible public spaces and addresses any identified issues as quickly as possible. When emergency maintenance of designated accessible public spaces is required, issues are addressed as quickly as possible. In both cases, a notice of service disruption will be posted as per this policy.

General Requirements

Training

The following individuals will receive training on a number of topics outlined in the regulation:

- Staff, board members, volunteers, agents/contractors, and any other individuals who interact with the public or other third parties on behalf of the GRCA
- Staff, board members, volunteers, agents/contractors, and any other individuals who participate in the development of GRCA policies, practices, and procedures governing the provision of goods, services, and facilities to members of the public or third parties

Accessibility training will be provided to the above-noted individuals within a reasonable amount of time. The GRCA will keep records of the training provided.

The training will include the following topics:

- A review of the purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of Integrated Accessibility Standards Regulation, Ontario Regulation 191/11
- How to interact and communicate with people in a manner that takes into account their disabilities
- How to interact with people with disabilities who use an assistive device, service animal or a support person
- How to use the equipment or assistive devices available on the GRCA's premises
- What action to take if a person with a particular type of disability is having difficulty accessing goods and services
- The process for people to provide feedback to the GRCA about its provision of goods and services to persons with disabilities and how the GRCA responds to the feedback and takes action on a complaint
- The GRCA's customer service policies, practices and procedures governing the provision of goods, services and facilities to people with disabilities
- The Ontario Human Rights Code as it pertains to persons with disabilities

Multi-Year Accessibility Plans

The GRCA shall develop an Accessibility Plan which outlines a phased strategy to address the current and future requirements of the AODA. The GRCA shall review the Plan and prepare an annual status update. The Accessibility Plan will be reviewed and updated in consultation with persons with disabilities at least once every five years. Upon request, the GRCA shall provide a copy of the Accessibility Plan to people with disabilities in an accessible format.

Procuring or acquiring goods, services or facilities

The GRCA's procurement processes will be inclusive and accessibility considerations and requirements will be incorporated throughout the procurement cycle, including the planning stages,

except where not practicable to do so. The GRCA will ensure that all selected vendors are aware of the need to provide accessible goods, services, and facilities on behalf of the GRCA, where applicable.

Self-service kiosks

When designing, procuring, or acquiring self-service kiosks, the GRCA shall ensure accessibility features are incorporated. For the purposes of this policy, 'kiosk' refers to 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.

Notice of Availability of Documents

The GRCA's Accessibility Standards Policy, practices, notices of temporary disruption and the feedback process are available upon request, subject to the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

If the GRCA is required to provide documents to a person with a disability, the document or the information contained in the document will be provided in a format that takes into account the person's disability. The GRCA will make reasonable efforts to respond to requests for documents in alternate formats in a timely manner.

Feedback Process

The GRCA welcomes feedback about the manner in which service is provided to persons with disabilities. Members of the public may comment in a range of formats; such as in person, by telephone, written feedback, e-mail, electronic text on disk or other methods. The feedback process and the feedback form will be made available under the accessibility section of the GRCA website at www.grandriver.ca. Alternative formats may also be made available as required to take into account a person's disability.

Feedback can be provided to the GRCA:

- by phone at 519-621-2761 x.2200,
- by emailing accessibility@grandriver.ca
- in person at any GRCA facility by arranging an appointment, or

by any other method required to take into account the person's disability.

To ensure the GRCA is able to fully consider and address the feedback received where possible, the following information should be provided:

- Time and date
- Description of feedback
- Contact information (should the individual wish to be contacted).

If the feedback constitutes a complaint about the accessibility of service to persons with disabilities, an attempt will be made to resolve the complaint immediately. If this cannot be achieved, the complaint will be forwarded to the supervisor, manager or director of the applicable department and responded to within 10 days.

All feedback will be reviewed and categorized, and a record will be maintained outlining the details of the feedback. Where applicable, action will be taken, and may include contact with the customer to verify information and/or resolve the issue. If requested, the GRCA will provide an acknowledgment of

feedback within 10 working days and/or will, when requested, respond to feedback submissions in a timely manner.

A summary regarding the nature of feedback and their outcomes will be compiled and reviewed for appropriate action and reported to the GRCA management committee annually.

Public Notification of the Feedback Process

A notification of the GRCA's feedback process will be included on the GRCA's website and other publications.

"GRCA values your feedback on the accessibility of the goods, services and facilities we provide. If you have any comments or complaints please let us know. Please complete our Feedback Form (available under the accessibility section of the GRCA website at www.grandriver.ca), phone (519) 621-2761, fax (519) 621-4945 or email accessibility@grandriver.ca to provide the details of the feedback and your contact information. GRCA will provide an acknowledgment of your feedback within 10 working days, if requested. Feedback, including complaints, will be reviewed by staff and compiled and reported to the management committee annually."

A condensed version of this notification may be included in publications.

Review and Modifications to the Accessibility Standards Policy

The Accessibility Standards Policy will be reviewed when additional accessibility related regulations are enacted or amended by the Government of Ontario, or as required.

Any policy of the GRCA that does not respect and promote the dignity and independence of people with disability will be modified or removed.

Customer Feedback Form

Thank you for visiting Grand River Conservation Authority. We value all of our customers and strive to meet everyone's needs.

Please tell us the date and time of your visit: _____

Did we respond to your customer service needs today? YES NO

Was our customer service provided to you in an accessible manner?

YES SOMEWHAT NO (please explain below)

Did you have any problems accessing our goods, services and facilities?

YES (please explain below) SOMEWHAT (please explain below) NO

Please add any other comments you may have:

Contact information (optional):*

Thank you.

NOTICE
SERVICE DISRUPTION

The estimated length of the temporary disruption is from **[insert estimated date and/or time]** to **[insert estimated date and/or time]**.

The following services and/or facilities are currently unavailable:

- 1) **[insert service or facility name and location]** due to **[insert reason for disruption]**
- 2) **[insert service or facility name and location]** due to **[insert reason for disruption]**

The following alternative services and/or facilities are available:

[insert alternative service or facility name and location]

Thank you for your patience in this matter.

For questions or additional information please contact:

Name –

Phone –

Fax –

Email –