

DRAFT POLICY

Customer Service – Accessibility Standards



Clerk's Department

Administered by the Clerk's Office

Effective Date – TBD

Replaces 2021 Version

POLICY STATEMENT

The Town of Carleton Place is committed to complying with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Integrated Accessibility Standards Regulation (O. Reg. 191/11), including the Customer Service Standard. The Town will make reasonable efforts to provide goods, services, and facilities in a manner that respects the dignity, independence, integration, and equal opportunity of persons with disabilities. Where integration is not feasible, alternative measures, whether temporary or permanent, will be implemented to ensure access.

PURPOSE

This policy ensures that the Town's goods, services, and facilities are accessible to persons with disabilities by identifying, preventing, and removing barriers to customer service, in compliance with O. Reg. 191/11. It applies to all Town employees, volunteers, agents, contractors, or representatives providing services on behalf of the Town.

SCOPE

This policy governs the provision of municipal goods, services, and facilities to ensure equitable access for all, regardless of ability, as required by the AODA and O. Reg. 191/11. Town staff will strive to reduce or remove barriers to accessing services.

POLICIES, PRACTICES AND PROCEDURES

Definitions

Assistive Device shall mean a piece of equipment or aid used by a person with a disability to assist with daily living (e.g., wheelchair, screen reader, hearing aid, cane, walker, oxygen tank).

Barrier shall mean anything that prevents a person with a disability from fully participating in society due to their disability, including physical, architectural, information, communication, attitudinal, technological, policy, or practice barriers.

Disability shall mean:

- any degree of physical disability, infirmity, malformation, or disfigurement caused by bodily injury, birth defect, or illness, including but not limited to diabetes mellitus, epilepsy, brain injury, paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or reliance on a guide dog, other animal, wheelchair, or other remedial appliance or device;
- a condition of mental impairment or developmental disability;
- a learning disability or dysfunction 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 Workplace Safety and Insurance Act, 1997.

Service Animal shall mean an animal used by a person with a disability for reasons relating to their disability, identifiable by visual indicators (e.g., vest or harness) or confirmed by documentation from a regulated health professional listed in O. Reg. 191/11, s. 80.47(4), or an identification card from the Attorney General or their Ministry under the Blind Persons' Rights Act, R.S.O. 1990, c. B.7, s. 4(2).

Support Person shall mean a person who accompanies a person with a disability to assist with communication, mobility, personal care, medical needs, or access to goods, services, or facilities.

Interactions with the Public

The Town provides customer service through in-person interactions (e.g., at the Town Hall), telephone, mail, email, fax, and the Town's website or social media.

The following practices and procedures have been developed in accordance with the Accessibility Standards for Customer Service (O. Reg. 191/11 of the Accessibility for Ontarians with Disabilities Act, 2005).

Use of Assistance and Assistive Devices

Persons with disabilities may use their assistive devices to access Town goods, services and facilities unless otherwise prohibited due to health and safety or privacy issues, in which cases, alternative measures may be provided to ensure the individual can access Town goods, services or facilities.

Where assistive devices are available in Town facilities, staff will be trained on their use. When requested, staff will make every effort to provide appropriate assistance, such as guidance to access facilities, assistance during emergency evacuations, or providing documents in large print or verbally. Town staff will consult with the person to explore how best to accommodate the request and determine whether the assistance can be reasonably provided.

Use of Service Animals or Support Persons

Town staff will ensure that persons with disabilities accompanied by a guide dog or other service animal are permitted to enter the premises with the animal and to keep the animal with them. When Town employees cannot easily identify that an animal is a service animal, they may ask the person to provide documentation (template, letter or form) from a regulated health professional confirming the person needs the service animal for reasons relating to their disability.

Town staff will ensure that when a person with a disability is accompanied by a support person, both persons are permitted to enter the premises. A support person may also be permitted to be present during the provision of Town services, but only when requested by the person seeking the service.

The Town may require a person with a disability to be accompanied by a support person to protect the health and safety of that person or of others on the premises. This will only occur after consultation with the person with a disability and when it is the only way to allow the person with a disability to access the Town's goods, services and facilities. If the Town determines that a support person is required, the Town will waive any fee or fare for the support person.

Commented [DS1]: It notes above that advance notice of the fee for support persons will be made available but here it says that fees will be waived. I think we should delete the previous paragraph sentence. Thoughts?

Town staff will ensure that the person seeking the service provides their consent with the support person being present during discussions that may be of a confidential nature.

Notice of Temporary Disruptions

The Town's policy on temporary disruptions is addressed at length in its own policy statement. The Town will provide notice of temporary service disruptions that affect accessibility, including the reason for the disruption, the expected duration, and alternate services where available.

Training of Staff

Training will be provided to all Town employees, volunteers, anyone who provides goods, services or facilities on behalf of the Town and anyone involved in developing Town policies and procedures. Training will be appropriate to the duties of employees, volunteers and other persons and include:

- The purpose of the AODA and the requirements of the Customer Service Standards;
- The Town's procedure on providing accessible customer service;
- The Ontario Human Rights Code, where it relates to people with disabilities;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people who use an assistive device or require the assistance of a service animal or a support person;
- How to use Town equipment or assistive devices available to help provide goods, services or facilities to people with disabilities (e.g. screen readers, wheelchairs, pool lifts, sound amplifiers, etc.); and
- What to do if a person with a disability is having difficulty accessing Town goods, services and facilities.

The Town shall keep records of training in accordance with O. Reg. 191/11 which include training dates and the names of participants.

All Town staff members will inform and familiarize themselves with the Town's policy, practices and procedures on the provision of services to persons with disabilities. All staff will take part in training that achieves the following goals:

- Reviews the purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and O. Reg. 191/11 Accessibility Standards for Customer Service.
- Ways to interact and communicate with persons with various types of disabilities.

- Ways to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
- How to use available equipment, devices or services that may help in serving persons with disabilities.
- What to do if a person with a disability is having difficulty accessing municipal services.

Training will be provided to each staff member as soon as practical after that person begins working for the Town. Training will be provided on an ongoing basis in connection with changes to policies, practices and procedures regarding the provision of services to persons with disabilities.

Town Staff will keep records of the training provided to staff on this topic, including the dates on which the training is provided and the number of individuals to whom it is provided.

Responsibilities

The Clerk's Office is responsible for:

- Administration of and ensuring compliance with this procedure.

Human Resources is responsible for:

- Providing accessibility training in accordance with the AODA and relevant policies and procedures

All departments are responsible for:

- Ensuring the Accessible Customer Service Standard procedure is followed;
- Providing or arranging for accessible documents and communication supports upon request;
- Tracking accessibility requests;
- Providing information about service disruptions that will be posted on the Town's website and social media tools as required;
- Budgeting for accessibility requirements;
- Communicating and coordinating, when applicable, with a person with a disability regarding the use of a support person or service animal.

User (person with a disability) is responsible for:

- Supervising and keeping service animals in control when used to access the Town's goods, services and facilities; and
- Providing documentation confirming the service animal is required for reasons related to the individual's disability, if requested.

Feedback

Town Staff welcomes feedback on the way it provides its services to persons with disabilities. Feedback can be made in person, by telephone, by letter, by e-mail or in other accessible formats. Contact information for providing feedback is as follows:

**Attn: Stacey Blair, Clerk
Town of Carleton Place
175 Bridge Street
Carleton Place ON K7C 2V8**

If the feedback is a complaint, staff shall:

1. Acknowledge the complaint.
2. Review the circumstances of the situation, considering current policies, practices and procedures.
3. Provide a response to the complainant in writing, as well as verbally if requested.

Every effort will be made to respond to complaints as soon as practicable. Staff will make every reasonable effort to resolve the issue in accordance with its policies, practices and procedures for the provision of services to persons with disabilities.

Notice of Availability of Documents

The Town will make this policy available to any person upon request and will post notice of availability in a conspicuous location.

Format of Documents

If this document is requested by a person with a disability, Town staff will work with the person to provide the document, or the information included in the document, in a format that considers the person's disability. This may include providing the information verbally, explaining the content and meaning of the information, or providing the document in a larger font.

Revising of Policy

The Clerk's Office is responsible for administering this policy, coordinating accessibility training together with the Human Resources Manager, and tracking feedback and compliance activities. Town staff shall review this document annually and make changes or additions as needed, particularly after receiving feedback from members of the public, or learning new information about assistive devices or resources.

Created and approved: XX XXX 2025