

# Accessibility Policy

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Category: General Administration

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## Policy Statement

The City of Ottawa is committed to providing equal treatment to people with disabilities with respect to the use and benefit of City services, programs, goods and facilities in a manner that respects their dignity and that is equitable in relation to the broader public. This commitment extends to residents, visitors and employees with visible or non-visible, and permanent or temporary disabilities.

## Purpose

This Policy is intended to provide the overarching framework to guide the review and development of other City of Ottawa policies, standards, procedures, practices, by-laws and guidelines to comply with the standards developed under the [Accessibility for Ontarians with Disabilities Act \(AODA\), 2005](#).

## Application

This Policy applies to all City employees (including Ottawa Public Health), volunteers, and to any individual or organization (third party) that provides goods, services, programs or facilities to the public or other third parties on behalf of the City in accordance with *AODA* legislation.

Transportation Services, such as OC Transpo, Para Transpo and Light Rail, are federally or independently regulated and therefore the *AODA*, a provincial statute, is not applicable. However, the City's Transportation Services Department is committed to meeting the spirit and intent of the *AODA* and therefore follow their own policies.

The Ottawa Public Library and the Ottawa Police Services report to separate boards and, as such, follow their own respective policies.

# Principles

The City shall develop, implement and maintain policies governing the provision of goods, services, programs and facilities to people with disabilities in a manner that:

- Is free from discrimination;
- Is available in accessible formats and with communication supports;
- Seeks to provide integrated services;
- Provides an opportunity equitable to others to obtain, use and benefit from the goods or services; and
- Takes into consideration a person's disability.

## Policy Requirements

### General Standards

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

### Accessibility Advisory Committee

The City of Ottawa has established an Accessibility Advisory Committee, with a majority of the members being persons with disabilities. The Committee shall advise Council about the requirements and implementation of *AODA* accessibility standards, the 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 Plans and Policies

The City produces a Multi-Year Accessibility Plan. The Plan is posted on the City's website and is available in accessible format and with communication supports upon request. Progress on the Plan is provided annually in the City of Ottawa Municipal Accessibility Plan (COMAP) Update Report to Council. The Accessibility Plan shall be reviewed and, if necessary, updated at least once every five years.

The City of Ottawa maintains policies governing how the City shall meet its requirements under the *AODA*, and the City provides policies in an accessible format upon request.

## Accessible Formats and Communication Supports

The City of Ottawa notifies the public regarding the availability of accessible formats and communication supports and shall, upon request and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports shall be provided in a timely manner, taking into account the person's particular accessibility needs and at a cost that is no more than the regular cost charged to other persons, in accordance with the City's Accessible Formats and Communication Supports Procedures ([see Appendix A](#)).

This requirement applies to City information, communications, documents and emergency procedures, plans or public safety information made available to the public.

This requirement does not apply to products and product labels, unconvertible information and communications, and information that the City does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, the department shall provide the person requesting the information or communication with:

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

Further to this requirement:

- All verbal (Live and pre-recorded) state of emergency related communications, shall proactively include American Sign Language, simultaneous French translation, Langue des signes québécoise and captioning.
- All written electronic and web content related to state of emergency communication products shall be created in an accessible format. This includes but is not limited to documents, procedures, forms, plans or public safety information that are to be made available to the public.
- The City, as a designated public sector organization, as legislated under the [AODA's IASR 14 \(2\)](#) shall:
  - As of January 1, 2021, make any public facing website or web content conform with the World Wide Web Consortium Content Accessibility Guidelines (WCAG) 2.0 Level AA.

## **Procurement of Goods, Services, Facilities and Self-Service Kiosks**

When procuring goods, services, self-service kiosks or facilities, the City shall incorporate accessibility design, criteria and features unless it is not practicable – for example, if there are no accessible features in existence. If not practicable, or in instances where a purchase of an item without accessible features is made where they exist, the City shall provide an explanation, upon request.

## **Training**

All City employees, volunteers and third parties providing goods and services to members of the public on the City's behalf, as well as those who develop the policies, practices and procedures governing the provision of goods or services to members of the public or other third parties, shall receive accessibility training.

This training shall include:

- A review of the purposes of the *AODA* and the requirements of the *Integrated Accessibility Standards Regulation IASR (Ontario Regulation 191/11)* and instruction about the following matters:
  - How to interact and communicate with persons with various types of disability;
  - How to interact with persons with disabilities who use assistive devices or require the assistance of guide dogs or other service animals or the assistance of support persons;
  - How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services 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 or services; and
  - A review of the requirements of other accessibility standards referred to in the *AODA Integrated Accessibility Standards* and the *Human Rights Code* as it pertains to persons with disabilities.

The training provided shall be appropriate to the duties of the employee, volunteer or third party. Training shall take place as soon as is practicable; upon completion, the City shall keep a record of the training provided, including the dates on which accessibility training took place.

## **Feedback**

Feedback on how goods, services and programs are provided to people with disabilities shall be invited, forwarded to the appropriate personnel, responded to, documented and tracked. Feedback shall be collected by phone at 3-1-1 and Next Talk TTY (Teletypewriter), by email to the [Accessibility Office\(link sends e-mail\)](#), and in person at any of the City's service locations. Feedback shall be accepted and responded to in accessible formats and with other communication supports as required.

## **Customer Service Standards**

### **Assistive Devices, Service Animals and Support Persons**

City employees, volunteers and third party contractors shall accommodate the use of personal assistive devices including, but not limited to, wheelchairs, canes, walkers, scooters and Braille display boards. Where available, assistive devices including, but not limited to, assistive listening devices such as FM Loop systems, shall be kept in good working order and the public shall be informed of their availability.

Persons with disabilities, accompanied by a guide dog or other service animal and accessing goods, services or facilities that are provided to members of the public or other third parties at premises owned or operated by the City, shall be permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises (for example, in food preparation areas as prohibited by *Food Premises, R.R.O. 1990, Reg. 562* under the *Health Protection and Promotion Act, R.S.O. 1990, c. H.7*).

If a service animal is excluded by law from the premises, the City shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities.

An animal is a service 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, described in Section 80.45 (4) of the IASR, confirming that the person requires the animal for reasons relating to the disability.

If a person with a disability is accompanied by a support person, the City permits both persons to enter the premises together and the person with a disability is not prevented from having access to the support person while on the premises.

If the City charges an admission fee to a support person, the City shall ensure that notice is given in advance about the amount, if any, that is payable in respect of the support person accompanying a person with a disability.

As per *Section 80.47(5)* of the *IASR*, the City may require that a person with a disability be accompanied by a support person when on City premises or participating in City-run programs, but only if, after consulting with the person with a disability, City staff determine that:

- a. The support person is necessary to protect the health and safety of the person with a disability and the health and safety of others on the premises; and,
- b. There is no other reasonable way to protect the health or safety of the person with a disability and the health and safety of others on the premises.

In such instances, the City shall waive any amount payable in respect of the support person's admission to the premises or in connection with the support person's presence on the premises.

### **Notice of Service Disruption**

In the event that there is a temporary service disruption in the availability of facilities, services or goods used by persons with disabilities (e.g., temporary loss of elevator service), the City shall give notice to the public of the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, that are available. Such notices are provided by a variety of methods, depending on the circumstances. They may include postings in conspicuous places at the affected premises, in other City facilities, and on the City's website.

## **Information and Communication Supports Standards**

### **Communication**

When communicating with a person with a disability, City employees, volunteers and third parties shall do so in a manner that takes into account the person's disability. Guidelines for communicating with people who have various types of disabilities are provided in Appendix B of the [Accessible Formats and Communication Supports Procedures](#).

## **Terminology**

When referring to people with disabilities, City employees, volunteers and third parties shall use terminology that adheres to guidelines provided in the City of Ottawa's Accessibility Training.

## **Accessible Websites and Web Content**

Internet websites and web content controlled directly by the City of Ottawa or through a contractual relationship that allows for modification of the product shall conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA in accordance with the schedule set out in the *AODA Integrated Accessibility Standards*.

## **Employment Standards**

### **Recruitment**

The City of Ottawa shall post information about the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available, upon request. The City shall consult with any applicant who requests an accommodation in a manner that takes into account the applicant's disability. Successful applicants shall be notified about the City's policies for accommodating employees with disabilities as part of their offer of employment.

### **Employee Supports**

The City shall inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. The City will provide this information to new employees as soon as practicable after they begin their employment and provide updated information to all employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

### **Accessible Formats and Communication Supports for Employee**

Upon an employee's request, the City shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

1. Information that is needed in order to perform the employee's job; and
2. Information that is generally available to employees in the workplace.

The City will consult with the employee making the request in determining the suitability of an accessible format or communication support. See [Accessible Formats and Communication Supports Procedure](#).

### **Workplace Emergency Response Information**

If an employee's disability is such that workplace emergency response information is necessary and the City is aware of the need for accommodation, this information shall be provided to employees. In addition, this information shall be provided, with the employee's consent, to the person designated to provide assistance. The information shall undergo review when:

- The employee moves to a different location;
- The employee's overall accommodation needs or plans are reviewed; and,
- The City reviews its general emergency response plan (IWERIP).

### **Documented Individual Accommodation Plans**

A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities. If requested, these plans shall include information regarding accessible formats and communication supports. If requested, the plans shall include individualized workplace emergency response information.

### **Return to Work Process**

The City shall have in place a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work process shall outline the steps that the City shall take to facilitate the return to work.

### **Performance Management, Career Development and Redeployment**

The City shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, conducting performance management and considering redeployment.

## **Transportation Standards**

### **Taxicabs**

Owner and operators of taxicabs licensed by the City of Ottawa are prohibited from charging additional fares or fees to persons with disabilities than for persons without



disabilities and for the storage of mobility aids or mobility assistive devices. The City requires that taxicabs licensed by the City make available vehicle registration and identification information in an accessible format.

## **Design of Public Spaces Standards**

The City shall comply with the *AODA Design of Public Spaces Standards (DOPS)* (including consultation requirements, when undertaking new construction and redevelopment of public spaces) in the following areas:

- Recreational trails and beach access routes;
- Outdoor public use eating areas;
- Outdoor play spaces;
- Exterior paths of travel;
- Accessible parking;
- Obtaining services; and
- Maintenance of accessible elements.

The City shall continue to ensure that the City's [Accessibility Design Standards](#) reflect the *AODA DOPS*.

## **Responsibilities**

The Accessibility Office is responsible for reviewing this Policy annually and recommending amendments to ensure ongoing compliance with regulated accessibility standards and legislated obligations.

- The Accessibility Office shall provide advice and direction on the implementation of this Policy.
- Supervisors and managers shall ensure that they and their staff are familiar with and comply with this Policy.

## **Monitoring /Contraventions**

Failure to comply with the *AODA* regulations can result in administrative penalties.

Supervisors and managers shall monitor current practices to ensure compliance.

Failure to comply with this Policy may result in disciplinary action, up to and including dismissal.

## References

City of Ottawa, Municipal Accessibility Plan (COMAP)

## Legislative and Administrative Authorities

[Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11](#)

[Integrated Accessibility Standards, O. Reg. 191/11](#)

[Human Rights Code, R.S.O. 1990, c. H.19](#)

## Definitions

**Accessible Formats** – May include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats.

**Communication Supports** – May include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

**Disability**– Defined as per Section 2 of the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 and the Human Rights Code, R.S.O. 1990, c. H.19, as follows:

- *“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 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.”*

**Kiosk** – 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.

**Service Animals** – As per Section 80.45(4) of the IASR:

*“An animal is 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 one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:*
  - 1. A member of the College of Audiologists and Speech-Language Pathologists of Ontario.*
  - 2. A member of the College of Chiropractors of Ontario.*
  - 3. A member of the College of Nurses of Ontario.*
  - 4. A member of the College of Occupational Therapists of Ontario.*
  - 5. A member of the College of Optometrists of Ontario.*
  - 6. A member of the College of Physicians and Surgeons of Ontario.*
  - 7. A member of the College of Physiotherapists of Ontario.*
  - 8. A member of the College of Psychologists of Ontario.*
  - 9. A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario. (O. Reg. 165/16, s. 16).”*

**Support Person** – As per Section 80.4(3) of the IASR:

*“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.”*

**Unconvertible** – Information or communications are unconvertible if it is not technically feasible to convert the information or communications, or the technology to convert the information or communications is not readily available.

For further information regarding this Policy, contact:

Accessibility Office

Office of the City Clerk

[accessibilityoffice@ottawa.ca](mailto:accessibilityoffice@ottawa.ca)

# Appendices

Appendix A: [Accessible Formats and Communication Supports Procedure](#)