



# The Corporation of the Town of Tecumseh

## Policy Manual

**Policy Number:** 66

**Effective Date:** June 28, 2016

**Supersedes:** RCM 417/09 November 4, 2009

**Approval:** June 28, 2018 (RCM 228/16)

**Subject:** Accessible Customer Service

### Purpose

- 1.0 The Corporation of the Town of Tecumseh (Town) is committed to being responsive to the needs of all its residents and visitors. To do this, we must recognize the diverse needs of all of our residents and visitors by striving to provide services and facilities that are accessible to all. As a provider of goods and services, the Town is committed to ensuring its goods and services are provided in an accessible manner.
- 2.0 The Town will promote accessibility through the development of policies, procedures and practices and by ensuring they consider people with disabilities. To do this we will make reasonable effort to ensure all policies, procedures and practices address **integration, independence, dignity and equal opportunity.**

### Principles

Reasonable efforts will be made to ensure the following:

- 3.0 That goods and services be provided in a manner that respects the dignity and independence of persons with disabilities.
- 4.0 The provision of goods and services to persons with disabilities will be integrated unless an alternate measure is necessary, whether temporarily or permanently, to enable a person with a disability to obtain, use or benefit from the goods and services.
- 5.0 Persons with disabilities will be given an equal opportunity to obtain, use and benefit from the goods and services.

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## Definitions:

### 6.0 Assistive Device

Is a technical aid, communication device or medical aid that is used to increase, maintain, or improve the functional abilities of people with disabilities, in seeing, hearing, speaking, mobility, walking, breathing, performing manual tasks, learning, working, or self-care. This type of device can be used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by the Accessibility Standards for Customer Service (Ontario Regulation 429/07).

### 7.0 Persons with Disabilities

For the purpose of this policy, 'disability' is defined according to the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) as:

- 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, 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 developmental disability,
- 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*.

### 8.0 Regulated Health Professional

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses 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 on Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

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## 9.0 Service Animals

For the purpose of this policy, a 'service animal' is defined as either:

9.1 A "guide dog," as defined in Sections 1 of the *Blind Persons Rights Act*; or

9.2 A "service animal" for a person with a disability:

9.2.1 If it is readily apparent that the animal is used by the person for the reasons relating to his or her disability (i.e. it wears a harness, vest, or other visual indicator), or

9.2.2 If you cannot easily identify that the animal is a service animal, you can ask the person to provide documentation from a *regulated health professional*. The documentation must confirm that the person needs the service animal for reasons relating to their disability.

## 10.0 Support Persons

For the purpose of this policy, a support person is defined as another person who accompanies a person with a disability in order to help him or her with communication, mobility, personal care, or medical needs or with access to goods or services.

## 11.0 Town

When used in this policy refers to The Corporation of the Town of Tecumseh.

### **Scope:**

12.0 Applies to all departments, divisions, or sections within the Town, including members of Council.

13.0 Applies to all employees, unionized and non-unionized.

14.0 Applies to all volunteers and contractors who interact with the public on behalf of the Town.

### **Procedures and Practices:**

Departmental policies, procedures, and practices will strive to reflect or achieve the following:

15.0 Communications will be considered in a manner that takes into consideration a person's disability.

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- 16.0 All employees, committee members, local boards, members of council and volunteers of the Town will be trained on accessible customer service and how to interact with people with different disabilities.
- 17.0 Persons with disabilities accompanied by a guide dog or service animal will be permitted in those areas of the premises owned or operated by the Town that are typically open to the public unless the animal is otherwise excluded by law.
- 18.0 In certain cases, a person with a disability might require to be accompanied by a support person for health or safety reasons. Before making a decision, the Town will:
- 18.1 Consult with the person with a disability to understand their needs;
  - 18.2 Consider health or safety reasons based on available evidence;
  - 18.3 Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.
- 19.0 If an amount is payable by a person for admission to the premises or in connection with a person's presence at the premises, the Town will ensure that the admissions fee or fare is waived for the support person.
- 20.0 Notice will be provided to the public when facilities or services that people with disabilities rely on to access the Town's services are temporarily disrupted.
- 21.0 The Town will establish a process for receiving and responding to feedback to allow people to provide feedback on whether the Town is providing accessible goods and services.
- 22.0 The Town acknowledges that persons with disabilities may elect to use their own personal assistive devices to obtain, use or benefit from the services offered by the Town of Tecumseh.
- 23.0 This document will be made available upon request in a variety of accessible formats.

### **Feedback Processes:**

- 24.0 Should a member of the public wish to make a complaint regarding the accessible provision of goods or services they have received, the member of the public can advise the Town of their complaint or concern through any of the following means:
- 24.1 Make a submission through the on-line feedback form available on the Town of Tecumseh website [www.tecumseh.ca](http://www.tecumseh.ca);

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- 24.2 Send an e-mail outlining the nature of the complaint or concern to the following e-mail address: [accessibility@tecumseh.ca](mailto:accessibility@tecumseh.ca);
- 25.0 Contact by telephone the Department Head or designate responsible for delivering the goods or services for which there is a complaint or comment;
- 25.1 Attend the office and meet the Department Head or designate responsible for delivering the goods or services for which there is a complaint or comment.
- 26.0 The Town will ensure that the feedback process is accessible by providing or arranging for accessible formats and communication supports, upon request.
- 27.0 A response will be provided to anyone providing a complaint or comment regarding the provision of accessible goods and services, in the same manner as the complaint or comment was received, within thirty (30) days.
- 28.0 If deemed appropriate, a complaint or comment regarding the provision of accessible goods and services may be directed to the Tecumseh Accessibility Advisory Committee for recommendations on how to address the complaint or comment.
- 29.0 If agreement on the resolution of a complaint cannot be reached between the appropriate Department Head or designate and the complainant, the matter will be directed to the Chief Administrative Officer for disposition.
- 30.0 If the Chief Administrative Officer is unable to provide a satisfactory resolution to the complaint, the complainant has the option of presenting the complaint to Town Council for final disposition.

### **Service Disruption:**

- 31.0 If, in order to obtain, use or benefit from the Town's goods or services, persons with disabilities usually use particular facilities or services (for example, elevators) and if there is a planned temporary disruption in those facilities or services in whole or in part, the Town shall give notice of the disruption to the public.
- 32.0 Notice of the disruption must include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or service, if any, that are available.
- 33.0 Notice will be given by posting the information about the service disruption at a conspicuous place on premises owned and operated by the Town, as well as by posting the information on the Town's website ([www.tecumseh.ca](http://www.tecumseh.ca)) and providing audio messages by the automated telephone attendant for the facility where the

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service disruption is going to take place. If deemed appropriate and time permits, planned disruptions of services may also be published in local newspapers and broadcast on local radio stations.

- 34.0 If a temporary service disruption of the website is planned, advance notice to the extent possible, keeping with the conditions of the disruption section of this policy, shall be provided.
- 35.0 In the event of an unplanned service disruption, notice will be given as soon as feasibly possible in the manner described in this section.

### **Format of Documents:**

- 36.0 Should the Town be requested to provide a copy of a document to a person with a disability, the Town shall give the person the document, or the information contained in the document, in a format that takes into account the person's disability.
- 37.0 Material printed in-house and publications produced on behalf of the Town should contain a note indicating "alternate formats are available upon request" and include relevant contact information.
- 38.0 The Town will consult the person requesting the document to determine what an accessible alternate format of the document or information would be, in accordance with the provisions of this policy.
- 39.0 The time frame attached to the conversion process varies depending on the media chosen, the size, complexity, quality of source documents and number of documents to be converted. Documents shall be returned in a timely manner depending on the factors previously noted.
- 40.0 Conversion shall be processed in-house wherever possible. When a member of the public requests a Town document, or portion thereof, in an alternate format, the department of origin shall be responsible for the cost of the conversion, materials and distribution, not the public requestor.
- 41.0 In-house printing, where possible, should adhere to the CNIB's Clear Print Standards or any subsequent accessible information and communication policies.

### **Training:**

- 42.0 The Town shall ensure that the following persons are trained on the policies, practices and procedures establishing the accessible provision of its goods and services to persons with disabilities:

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- 42.1 Every person who deals with members of the public or other third parties on behalf of the Town, whether the person does so as an employee, agent, volunteer or otherwise.
  - 42.2 Every person who participates in developing the Town's policies, practices and procedures governing the provision of goods or services to members of the public or other third parties.
  - 43.0 This training will include a review of the purposes of the AODA and the requirements of this policy and instruction about the following matters:
    - 43.1 How to interact and communicate with persons with various types of disabilities, as outlined in this policy and associated practices and procedures.
    - 43.2 How 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, as outlined in this policy and associated practices and procedures.
    - 43.3 How to use equipment or devices available on premises owned or leased by the Town otherwise provided by the Town that may help with the provision of goods or services to a person with a disability.
    - 43.4 What to do if a person with a disability is having difficulty accessing goods or services provided by the Town.
  - 44.0 Training will be provided to each person as soon as practicable after he or she is assigned the applicable duties.
  - 45.0 Training will also be provided on an ongoing basis in connection with changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities.
  - 46.0 The Town will log and maintain records which will record the details of the training provided, as well as the name of the person, location, and date the training was completed.

### **Assistive Devices:**

- 47.0 The Town acknowledges that persons with disabilities may elect to use their own personal assistive devices to obtain, use or benefit from the goods and services offered by the Town.

- 48.0 Should a person with a disability be unable to access the Town's goods and services through the use of their own personal assistive device, the Town will ensure the following measures:
- 48.1 Determine if the provision of the good or service is inaccessible, based upon the individual's requirements.
  - 48.2 Assess potential accessible service delivery options to meet the needs of the individual.
  - 48.3 Notify the person with a disability of an alternative method of providing the goods or services and how they can access the alternative, temporarily or on a permanent basis.
- 49.0 Note: - This policy is available in alternative formats, upon request. Please contact the Director Corporate Services & Clerk at [lmoy@tecumseh.ca](mailto:lmoy@tecumseh.ca)