



The Corporation of the Town of Tecumseh

Policy Manual

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1. Purpose

- 1.1 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 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.
- 1.2 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.

2. Principles

- 2.1 Reasonable efforts will be made to ensure:
 - 2.1.1 that goods and services are provided in a manner that respects the dignity and independence of Persons with Disabilities.
 - 2.1.2 that the provision of goods and services to Persons with Disabilities will be integrated, unless an alternate measure is necessary, whether temporary or permanent, to enable a person with a disability to obtain, use, or benefit from the goods and services.
 - 2.1.3 that Persons with Disabilities will be given an equal opportunity to obtain, use, and benefit from the goods and services.

3. Definitions

- 3.1 **“Assistive Device”** means 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).
- 3.2 **“Person(s) with Disabilities”** means, for the purpose of this Policy, any person having a ‘disability’ as defined in the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) as a person having:

- 3.2.1 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;
 - 3.2.2 a condition of mental impairment or developmental disability;
 - 3.2.3 learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
 - 3.2.4 a mental disorder; or
 - 3.2.5 an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act*, 1997.
- 3.3 **“Regulated Health Professional”** is defined as a member of one of the following colleges:
- 3.3.1 College of Audiologists and Speech-Language Pathologists of Ontario
 - 3.3.2 College of Chiropractors of Ontario
 - 3.3.3 College of Nurses Ontario
 - 3.3.4 College of Occupational Therapists of Ontario
 - 3.3.5 College of Optometrists of Ontario
 - 3.3.6 College of Physicians and Surgeons of Ontario
 - 3.3.7 College of Physiotherapists of Ontario
 - 3.3.8 College of Psychologists of Ontario
 - 3.3.9 College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario
- 3.4 **“Service Animals”** means, for the purposes of this policy, either:
- 3.4.1 a “guide dog,” as defined in Section 1 of the *Blind Persons Rights Act*; or
 - 3.4.2 a “service animal” in the control of or for the benefit of a person with a disability if:

- 3.4.3 it is readily apparent that the animal is used by the person for reasons relating to his or her disability (e.g., it wears a harness, vest, or other visual indicator), or
- 3.4.4 you cannot easily identify the animal as a service animal, you may ask the person to provide documentation from a regulated health professional. The documentation must confirm the person requires the animal for reasons relating to their disability.
- 3.5 **“Support Persons”** means a person who accompanies a person with a disability in order to help them with communication, mobility, personal care, or medical needs or with access to goods or services.
- 3.6 **“Town”** means The Corporation of the Town of Tecumseh.

4. Scope

This Policy applies to all Town employees, including Members of Council, Committees, and Local Boards, volunteers and contractors who interact with the public on behalf of the Town.

5. Procedures and Practices

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

- 5.1 Communication will be considered in a manner that takes into consideration a person's disability.
- 5.2 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 through their onboarding orientation. Employees will be advised of policy updates or legislative changes through internal communication and/or through the Town's intranet.
- 5.3 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.
- 5.4 In certain cases, a person with a disability may require to be accompanied by a Support Person for health or safety reasons. Before making a decision, the Town will:
 - 5.4.1 consult with the person with a disability to understand their needs;

- 5.4.2 consider health or safety reasons based on available evidence;
- 5.4.3 determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.
- 5.5 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.
- 5.6 Notice will be provided to the public whenever Town facilities or services that Persons with Disabilities rely on to access the Town's services are temporarily disrupted.
- 5.7 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.
- 5.8 This document shall be made available, upon request, in an accessible format on the Town's website.

6. Feedback Processes

- 6.1 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:
 - 6.1.1 Make a submission through the 'report to an issue' feature available on the Town of Tecumseh website www.tecumseh.ca;
 - 6.1.2 Contact by telephone at 519-735-2184 ext. 101 for assistance in filing the complaint.
- 6.2 The Town will ensure the feedback process is accessible by providing or arranging for accessible formats and communication support, upon request.
- 6.3 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 five (5) days.
- 6.4 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.

- 6.5 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.
- 6.6 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.

7. Service Disruption

- 7.1 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, transit) 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.
- 7.2 Notice of the disruption must include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.
- 7.3 Notice will be given by posting 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 and providing audio messages by the automated telephone attendant for the facility where the service disruption is going to take place.
- 7.4 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.
- 7.5 In the event of an unplanned service disruption, notice will be given as soon as feasibly possible in the manner described in this section.

8. Format of Documents

- 8.1 Should the Town be requested to provide a copy of a document to a person with a disability, the Town shall consult and give the person the document, or the information contained in the document, in a format that takes into account the person's disability.
- 8.2 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.

- 8.3 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.
- 8.4 In-house printing, where possible, should adhere to the CNIB's Clear Print Standards or any subsequent accessible information and communication policies.

9. Training

- 9.1 The Town shall ensure the following persons are trained in the policies, practices, and procedures establishing the accessible provision of its goods and services to Persons with Disabilities.
 - 9.1.1 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.
 - 9.1.2 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.
- 9.2 This training will include a review of the purposes of the AODA and the requirements of this Policy and instructions about the following matters:
 - 9.2.1 How to interact and communicate with Persons with Disabilities of varying types, as outlined in this Policy and associated practices and procedures.
 - 9.2.2 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
 - 9.2.3 How to use equipment or devices available on premises owned or leased by the Town or otherwise provided by the Town that may help with the provision of goods or services to a Person with Disabilities.
 - 9.2.4 What to do if a Person with Disabilities is having difficulty accessing goods or services provided by the Town.
- 9.3 Training will be provided to each person as soon as practicable after they are assigned their applicable duties. 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.

- 9.4 The Town will log and maintain records recording the details of the training provided, as well as the name of the person, location, and date the training was completed.

10. Assistive Devices

- 10.1 The Town acknowledges that Persons with Disabilities may elect to use their own personal assistive devices to obtain, use, or benefit from goods and services offered by the Town.
- 10.2 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 take the following measures:
- 10.2.1 Determining if the provision of the good or service is inaccessible, based upon the individual's requirements.
 - 10.2.2 Assessing potential accessible service delivery options to meet the needs of the person with a disability.
 - 10.2.3 Notifying 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.

11. Policy Review

The Legislative & Clerk Services Department is responsible for this Policy. This Policy will be reviewed every four (4) years or updated when legislatively required.

12. Related Documents

- 12.1 *Accessibility for Ontarians with Disabilities Act, 2005.*
- 12.2 O. Regulation 191/11 Integrated Accessibility Standards Regulation