

	Integrated Accessibility Standards Regulation Policy, Ontario Regulation 191/11	
	Policy Category: <i>Accessibility</i>	
	Policy No.: <i>N/A</i>	Implementing Procedure No.: <i>N/A</i>
Approving Authority: <i>Council</i>	Effective Date: <i>July 1, 2013</i>	
Approved or Last Reviewed Date: <i>N/A</i>	Next Review Year: <i>(every 5 years)</i>	
Area(s) this policy applies to: <i>City-wide</i>	Owner Department: <i>Sustainability Office/Accessibility Coordinator</i>	
Related Policy(ies): <ul style="list-style-type: none"> <i>Accessible Customer Service Policy</i> 		

Note: Questions about this policy should be directed to the Owner Department.

1. Purpose Statement *(Outline why the organization is issuing the policy and its desired effect or outcome of the policy)*

The purpose of this policy is to set out the requirements of the Integrated Accessibility Standards Regulation (IASR) Ontario Regulation 191/11, http://www.e-laws.gov.on.ca/html/source/regs/english/2011/elaws_src_regs_r11191_e.htm, under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), which reflects a number of accessibility standards that organizations across Ontario, including the City, are required to comply with.

Note: This policy is NOT intended to replace or supersede the City's Accessible Customer Service Policy that was approved by Council on June 1, 2009.

The requirements set out in this policy and the IASR are not a replacement or a substitution for the requirements established under the *Human Rights Code*. Nor do the standards or policy limit any obligations owed to persons with disabilities under any other legislation.

2. Applicability and Scope Statement *(Who and what this policy applies to and/or affects)*

This policy applies to all City of Markham employees, volunteers and all other persons or third parties who provide goods, services or facilities on behalf of the organization.

3. Background *(Indicate any reasons, history, and intent that led to the creation of the policy)*

In a report to General Committee on June 1, 2009, the Committee was advised of the mandatory accessible customer service requirements under the Accessibility Standards for Customer Service, Ontario Regulation 429/07. This regulation was made under AODA. The City adopted its accessible customer service policy on January 1, 2010 to meet the requirements of this regulation.



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In 2011, the IASR, Ontario Regulation, 191/11, under the AODA was released. The IASR integrates the information and communications standards, employment standards and transportation standards.

Organizations subject to the IASR include the following:

- Large designated public sector organizations (50+ employees);
- Small designated public sector organizations (less than 50 employees);
- Large private or not-for-profit sector organizations (50+ employees); or
- Small private or not-for-profit sector organizations (less than 50 employees).
- The government of Ontario and Legislative Assembly

The City of Markham is a large public sector organization.

Penalties for non-compliance with the IASR can range from five to 15 thousand dollars.

4. Definitions *(If applicable, define any terminology or interpret meanings of a general term)*

- IASR stands for Integrated Accessibility Standards Regulation
- AODA stands for Accessibility for Ontarians with Disabilities Act, 2005
- MACA stands for Markham Advisory Committee on Accessibility

5. Policy Statements *(Detail the specific regulations, requirements, or modifications to organizational behaviour to be addressed by this policy)*

Statement of Organizational Commitment

The Corporation of the City of Markham (herein after the “City”) is committed to developing, implementing, maintaining, and enhancing accessibility as set out under the AODA and its standards for people with disabilities, in a manner that:

- Reflects the principles of dignity and independence;
- Seeks to provide integrated services; and
- Provides persons with disabilities with an opportunity equal to that of others to obtain, use and benefit from goods and services

General Requirements

1. Accessibility Plans



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The City's Accessibility Coordinator with support from Human Resources, ITS, Purchasing and others will establish, implement, maintain, monitor and report on a multi-year accessibility plan commencing in 2013 that outlines its strategy to prevent and remove barriers and meets its requirements under the IASR. The multi-year accessibility plan will be:

- Provided in an accessible format, upon request, as soon as is practical
- Established, reviewed and updated in consultation with persons with disabilities and the Markham Advisory Committee on Accessibility (MACA).
- Reviewed and updated at least once every five years

2. Procurement

When procuring or acquiring goods, services, self-service kiosks or facilities, the City shall incorporate accessibility criteria and features when practical. If not practical, the City's Purchasing department in collaboration with the Accessibility Coordinator shall provide an explanation, upon request.

3. Training

As required by the IASR, the City shall ensure that the following persons are provided with training on the requirements of the accessibility standards referred to in the IASR and on the *Human Rights Code*, as it pertains to persons with disabilities:

- All employees and volunteers;
- All persons who participate in developing the organization's policies; and
- All other persons or third parties who provide goods and services on behalf of the organization. The City will ensure third parties receive training through its procurement process

Training will commence in 2013 or as soon as practical. Training will continue on an ongoing basis as new staff, volunteers and third parties are hired.

Training on the requirements of the IASR and the *Human Rights Code* shall be appropriate to the duties of employees, volunteers and other persons. Records of training, including the dates provided, shall be kept by the Accessibility Coordinator. Human Resources will also keep a copy.

Accessible Information and Communication Standards

1. Feedback Process

The City's feedback process is outlined in its "Accessible Customer Service Policy" (Attachment 2).



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2. Alternative Format Process

The City's accessible format process is outlined in its "Accessible Customer Service Policy" (Attachment 2).

3. Emergency Information

The City shall provide publically available emergency procedures, plans and public safety information in an accessible format or with appropriate communication supports, upon request, as soon as practical.

4. Website Accessibility

The City internet website and web content shall conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 – initially at Level A and increasing to Level AA by January 1, 2014. An example of WCAG 2.0 Level A compliance is page titles. An example of Level AA compliance is the ability to resize text.

Any new web content shall conform to WCAG 2.0 Level A. By January 1, 2021, the entire internet website and all web content shall conform to WCAG 2.0 Level AA (exceptions: Captions (live), Audio Descriptions (pre-recorded)).

It may not be possible to meet all WCAG 2.0 requirements. In these cases, upon request the City's ITS department and Accessibility Coordinator will work with individuals to make the City's internet website accessible to them in an appropriate manner, such as large print or Braille.

5. Public Library

Public Library Boards shall:

- Provide access to, or arrange for the provision of access to, accessible materials where they exist
- Provide information in an accessible format or with appropriate communication supports, upon request



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Accessible Employment Standards

1. Recruitment, Assessment or Selection Process

The City will notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

If a selected applicant requests an accommodation, the City will consult with the applicant and provide suitable accommodation in a manner that takes into account the applicant's accessibility needs due to his or her disability.

2. Notice to Successful Applicants

When making offers of employment, the City will notify the successful applicant of its policies for accommodating employees with disabilities.

3. Informing Employees of Supports

The City will inform employees of its policies used to support employees with disabilities. The City will provide the information required to new employees as soon as practicable after they begin employment.

The City will provide updated information to its 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 his or her disability.

4. Employee Workplace Emergency Information

The City is committed to the development and implementation of fire safety and evacuation plans that include direction relating to persons with disabilities. It is the responsibility of the disabled employee to



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communicate any specific requirements to their performance manager, who will work with the employee to ensure appropriate support.

5. Employee Accommodation

The City is committed to reviewing employee requests for workplace accommodation, as supported by medical documentation, and will make reasonable efforts to provide workplace accommodation, including written accommodation plans, as required.

6. Return to Work

The City is committed to reviewing employee requests for workplace accommodation in anticipation of return to work, as supported by medical documentation, and will make reasonable efforts to provide workplace accommodation including written return to work plans, as required.

7. Performance Management, Career development, Redeployment

The City is committed to providing employees with support to meet their accessibility needs, as supported by medical documentation where required, to assist them in the performance of their jobs and in the removal of any barriers to employment opportunities.

Transportation Standards

The City shall:

- As part of its multi-year accessibility plan determine the feasibility and demand for accessible taxi services in Markham. This will be done through consultation with the taxi industry, the public and the MACA.

6. Roles and Responsibilities *(Outline roles and responsibilities of those involved in the implementation of the policy)*

Implementation of this policy will be monitored through an internal staff working group. This working group will be led by the Accessibility Coordinator and will consist of representatives from all departments responsible for implementing this policy. The working group will meet quarterly.