

ACCESSIBLE CUSTOMER SERVICE POLICY

CITY OF GREATER SUDBURY POLICIES AND PROCEDURES

DEPARTMENTS: All Departments	TITLE: Accessible Customer Service Policy
APPROVED BY: Clerk's Services	DATE APPROVED: March 6, 2020

1.0 Overview

The *Accessibility for Ontarians with Disabilities Act* (the "AODA") was passed by the Ontario government in June of 2005 to remove barriers and make the province accessible for all by 2025.

As part of the AODA, *Ontario Regulation 191/11 the Integrated Accessibility Standards* (the "Standards"), was adopted in June of 2011. The Standards under this Regulation set out specific obligations, timelines and targets for organizations to ensure compliance with accessibility legislation. The Standards are broken down into the following areas:

- Information and Communications;
- Employment;
- Transportation;
- Design of Public Spaces; and
- Customer Service.

The requirements of the AODA and the Standards are not a replacement or a substitution for the requirements established under the Human Rights Code nor do they limit any obligations owed to persons with disabilities under any other legislation.

2.0 Policy Statement

The City of Greater Sudbury (the "City") is committed to eliminating barriers and improving access for persons with disabilities by providing its citizens with an inclusive accessible community through its passage and adoption of strategies and policies that promote dignity, independence, integration and equal opportunity for all citizens.

This policy acknowledges the legislative requirement and the commitment of the City to provide accessible goods and services to all persons that we serve.

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The City will continue to work under the legislative frameworks of the AODA, the *Ontario Human Rights Code, 1990* and other associated pieces of legislation to ensure that compliance with the Customer Service Standard and all other accessibility standards is achieved.

3.0 Purpose

The Customer Service Standard under the AODA requires organizations to develop, implement and maintain policies governing their provision of goods, services or facilities as the case may be, to persons with disabilities. This policy is developed in accordance with the Customer Service Standard and addresses the following:

- The provision of goods and services to persons with disabilities;
- The use of assistive devices by persons with disabilities;
- The use of service animals by persons with disabilities;
- The use of support persons by persons with disabilities;
- Notice of temporary disruptions in services and facilities;
- Training;
- Customer service feedback regarding the provision of goods and services to persons with disabilities; and
- Notice of availability and format of documents.

4.0 Application

This policy applies to all City employees, 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.

This policy also applies to all persons who participate in the development of the City's policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

5.0 Principles

The City shall develop, implement and maintain policies governing the provision of goods, services, programs and facilities in a manner that respects the dignity, independence, integration, and equal opportunity of persons with disabilities and 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.

6.0 Accessibility Advisory Panel

The City's Accessibility Advisory Panel's mandate is to provide advice on the accessibility of municipal programs, services and facilities as required under the *Ontarians with Disabilities Act, 2001*, the AODA and the Standards.

The panel; comprised of eleven (11) members, the majority of whom are people with disabilities, provides insight to municipal staff when requested to do so and will periodically review this policy and other accessibility policies and provide advice with respect to its implementation and continued effectiveness, as well as recommend any changes that may be required from time to time.

7.0 Definitions

"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.

"Accessible Formats" may include, but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats used by persons with disabilities.

"Barrier" means anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, architectural barrier, information or communications barrier, attitudinal barrier and other supports that facilitate effective communication.

"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 communication.

"Disability" means:

- (a) 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 coordination, 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;

- (b) a condition of mental impairment or a developmental disability;
- (c) a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- (d) a mental disorder; or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

“Service Animal” is a working animal that has been trained to assist and perform tasks for persons with disabilities. Under the legislative authority, and animal is considered to be a Service Animal if:

- (a) if it the animal is required by a person with a disability for assistance; or
- (b) if 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:
 - i. A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
 - ii. A member of the College of Chiropractors of Ontario.
 - iii. A member of the College of Nurses of Ontario.
 - iv. A member of the College of Occupational Therapists of Ontario.
 - v. A member of the College of Physicians and Surgeons of Ontario.
 - vi. A member of the College of Physiotherapists of Ontario.
 - vii. A member of the College of Psychologists of Ontario.
 - viii. A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Service animals include, but are not limited to “guide dogs”: a guide dog in section 1 of the *Blind Persons’ Rights Act*; means a dog trained as a guide dog for a blind persons

and having the qualifications prescribed by the regulations under the *Blind Persons' Rights Act*.

“Support Person” means, in relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care or medical needs or with access to goods and services.

8.0 Procedure

The City will endeavor to identify and remove barriers to access for people with disabilities by performing the following actions (this list is not exhaustive):

- Training staff about key principles and accessibility strategies and tools;
- Communication with each person with a disability in a manner that takes into account their disability;
- Permitting persons with disabilities to bring their guide dog or service animal with them to areas open to the public;
- Permitting people with disabilities who use a support person to be accompanied by the support person and ensuring that a person with a disability has access to their support person while accessing goods and services;
- Encouraging persons with disabilities to use their own personal assistive devices to improve access to goods and services;
- Enabling persons with disabilities to access and utilize goods and services by offering assistive devices, measures, accessible formats, communication supports and accommodation;
- Providing notice when goods, facilities or services that people with disabilities rely on to access goods, programs and services are temporarily disrupted; and
- Establishing a process for people to provide feedback on how goods, programs and services are delivered and explaining how the City will respond to any feedback and what action will be taken.

9.0 Providing Goods and Services to People with Disabilities

The City will make reasonable efforts to:

- Provide its goods and services in a way that respects the dignity and independence of people with disabilities;

- Give people with disabilities the same opportunity to access the City's goods and services and allow them to benefit from the same services, in the same place and in a similar way as other customers; and
- Communicate with them in a manner that takes into account the person's disability

10.0 Assistive Devices

The City will accommodate the use of personal assistive devices including but not limited to, wheelchairs, canes, walkers, and scooters. Where available, assistive devices including, but not limited to, assistive listening devices such as FM and Infrared transmitters will be kept in good working order and the public will be informed of their availability.

10.1 Person's own assistive devices

A person with a disability may provide their own assistive device for the purpose of obtaining, using and benefiting from the City's goods and services unless otherwise prohibited by law (i.e.: health and safety reasons). In such situations, the City may offer a person with a disability other reasonable measures to assist them in obtaining, using and benefiting from the City's goods and services, and work with the person to determine an alternative means for access.

10.2 Assistive devices provided by the City

Where applicable, assistive devices owned and operated by the City will be available to assist with serving the customer's needs and requirements while utilizing the goods and services offered by the City.

Appendix A – provides additional information regarding accessibility provisions and access for persons attending Tom Davies Square, the types of assistive devices available and communication supports.

11. Service Animals

The City of Greater Sudbury has a corporate policy in place regarding the use of Service Animals and Guide Dogs, which applies to all City facilities, buildings, programs and services with the exception of Pioneer Manor. This policy should be referred to and followed regarding the responsibilities of the City and its employees regarding Guide Dogs and Service Animals, and the responsibilities of persons with disabilities accompanied by a Service Animal or Guide Dog.

12.0 Support Persons

The City is committed to welcoming people with disabilities who are accompanied by a support person. Persons with disabilities may be accompanied by a support person in areas or premises that are open to the public when accessing goods and services provided by the City. The City shall ensure that both the person with a disability and the support person are permitted to enter the premises together and that the person with a

disability is not prevented from having access to the support person while on the premises.

In certain circumstances, the City may deem it necessary to require a person with a disability to be accompanied by a support person. This will be required only if, after consultation with the person with a disability and considering all information, the support person is necessary to protect the health and/or safety of the person with a disability or the health and safety of others on the premises who are accessing goods and services provided by the City and there is no other reasonable way to protect the health and safety of all individuals.

The City will waive payment of the amount, if any, payable for a support person accompanying a person with a disability.

In certain circumstances a fee payable by the support person may be required. In these instances, if an amount is payable by a support person for admission to the premises or in connection with a support person's presence at the premises the City will ensure that notice is given in advance about the amount, if any, payable in respect of the support person by posting notice of fees for support persons wherever corporate fees are posted.

13.0 Notice of Temporary Disruptions

Temporary disruptions to City services and facilities that persons with disabilities might rely on to assist them in accessing the City's goods, services and facilities, may occur due to reasons that may or may not be within the City's control or knowledge.

Temporary service disruptions may include but are not limited to the following:

- Scheduled maintenance on structural features such as accessible parking spaces or ramps;
- Unexpected events such as, an out of order accessible washroom or broken elevator, transit route delays or cancellations due to weather conditions;
- Technical difficulties such as systems for broadcasting audio announcements on transit buses, system issues with assistive listening devices;
- Staff shortages such as the inability to book a note-taker or ASL interpreter.

The City will make reasonable efforts to provide prior notice of planned disruptions if possible, recognizing that in some circumstances such as in the situation of unplanned temporary disruptions, advance notice will not be possible.

The City will make reasonable efforts to provide notice of the disruption to the public, including:

- Information about the reason for the disruption;

- Its anticipated duration; and
- A description of alternative facilities or services, if any, that may be available.

When temporary disruptions occur to the City's services or facilities, the City will provide notice by:

- Posting the information in visible places, and/or
- On the City's website, or
- By any other method that may be reasonable under the circumstances as soon as reasonably possible.

14.0 Training

The City will provide training to all employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures.

All training, regardless of format, will include:

- Review of the purposes of the AODA and requirements of the customer service standard;
- Instruction on how to interact and communicate with people with various types of disabilities;
- Instruction on how to interact with people with disabilities who use assistive devices or require the assistance of a guide dog, other service animal or a support person;
- Instruction on how to use equipment or devices available at municipal premises or that are provided otherwise, that may help people with disabilities access municipal services, such as TTY telephones, elevators, lifts, accessible interactive kiosks or other technology; and
- Instruction on what to do if a person with a disability is having difficulty accessing municipal services.

The training will be provided to each person as soon as practicable after he or she is assigned the 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.

The City shall keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.

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15.0 Communication with Persons with Disabilities

The City is committed to meeting the communication needs of persons with disabilities in accordance with the Standards and will notify the public regarding the availability of accessible formats and communication supports.

16.0 Accessible Formats and Communication Supports

The City will notify persons to whom it provides goods and services that documents required under the AODA and its Standards are available upon request and in a format that takes into account the person's disability. This notice may be given by posting the information at a conspicuous place owned and operated by the City, the City's website and/or any other reasonable method.

Upon request, the City will provide or arrange for the provision of accessible formats and communication supports in a timely manner which considers the circumstances of the requestor and the urgency of their request. The City will consult with the person making the request and gain agreement in determining the suitability of an accessible format of communication support. The alternative format or support will be provided at a cost that is no more than the cost charged for the original format of the information or document.

17.0 Feedback

The City has processes in place for receiving and responding to feedback and will ensure that these processes are available to persons with disabilities by providing or arranging for the provision of accessible formats or communication supports upon request.

Feedback is accepted in the following formats:

- Completing the Accessibility Feedback form on the City of Greater Sudbury Accessibility website: <https://www.greatersudbury.ca/city-hall/accessibility/contact-us/>
- Mail: Clerk's Services, PO Box 5000 Station A, 200 Brady Street, Sudbury, ON P3A 5P3
- Email: accessibility@greatersudbury.ca
- Telephone: 705-674-4455 ext. 4209
- In person: Tom Davies Square or any of the City's Citizen Service Centres.

Feedback received regarding the City's provision of goods and services will be directed to the appropriate department for response and action.

18.0 Responsibility

The Legislative Compliance Coordinator in the Clerk's Services Department is responsible for reviewing this Policy and recommending amendments to ensure ongoing compliance with regulated accessibility standards and legislated obligations.

The Legislative Compliance Coordinator 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.

19.0 References

Accessibility for Ontarians with Disabilities Act, 2005

Ontario Regulation 191/11: Integrated Accessibility Standards

Human Rights Code, 1990

City of Greater Sudbury Corporate Accessibility Policy

Use of Service Animals and Guide Dogs in City of Greater Sudbury Facilities Policy

City of Greater Sudbury Strategic Multi-Year Accessibility Plan

Appendix A

Accessible Access, Assistive Devices, and Communication Supports

1.0 Accessible Entrances

There are a number of accessible entry points to Tom Davies Square, these include:

- Entrance via Paris Street ramp from sidewalk.
- Entrance via the Courtyard.
- Entrance via 199 Larch Street.

2.0 Accessible Parking

Accessible Parking spots are available for persons with disabilities who possess the required permits at all municipal parking lots surrounding Tom Davies Square and in the underground parking garage. Permit holders may park for up to four hours for free at municipal parking meters and Pay & Display lots.

3.0 Interpreters, Note-takers and Remote Interpretation Services

Upon request, the City of Greater Sudbury will provide sign language interpretation or computerized note-taking services for persons with disabilities who attend meetings or events organized/run by the City through one of the following organizations:

- Canadian Hearing Society (American Sign Language – ASL)
- Canadian Hard of Hearing Society (Computerized Note-Taking)
- Maple Communications (Remote Interpretation Services)

Prior to booking any services, city staff must consult with the person with a disability who is requesting the service to determine which form of interpretation would be most appropriate and beneficial for the individual.

All interpretation services should be booked well in advance of any meetings or events as interpreters are not available on demand and are limited in their availability and numbers in Greater Sudbury. If an interpreter is not available for the preferred service, staff must contact the individual to determine whether or not they would be amenable to receiving interpretation in another format.

3.1 Requesting an Interpreter or Note-Taker

As noted above the City of Greater Sudbury works with three organizations to provide interpretation and note-taking services for persons with disabilities. The following

provides information regarding each organization and how to go about booking the service.

Canadian Hearing Society: provides American Sign Language (ASL) interpretation services. In order to book this service for an individual an email needs to be sent to interpreting@chs.ca with Request for Interpreter – Event Name and Date in the subject line.

In the body of the email describe the nature of the event that will be taking place i.e.: City Council or Committee Meeting, Press Conference or proclamation, small meeting etc. You will also need to include the following information:

- Date of the event.
- Time of the event.
- Location of the event.
- Duration of the event.
- Approximate number of how many attendees will be at the event.
- Number of persons requiring the interpretation service.

You will also need to provide information for invoicing, where and to whom the bill for the service can be sent:

City of Greater Sudbury
Attention: **(Department Name)**
200 Brady Street
PO Box 5000, Station A
Sudbury, ON, P3A 5P3

Billing customer number: 00-1091654

Contact name and phone number

Agendas, speaking notes or briefs should be sent in advance of the event.

CHS will advise as to whether or not an interpreter is available to attend.

Canadian Hard of Hearing Society: provides computerized note-taking services: In order to book this service for an individual an email needs to be sent to suehorvath@cchasudbury.com with Request for Note-Taker – Event Name and Date in the subject line.

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In the body of the email provide information regarding the event/meeting ie: what type of event or meeting is taking place. You will also need to include information regarding:

- Date of the event.
- Time of the event.
- Location of the event.
- Duration of the event.
- Approximately how many people will be attending.
- Number of persons requesting the service and their names.

You will also need to provide information for invoicing, where and to whom the bill for the service can be sent:

City of Greater Sudbury
Attention: **(Department Name)**
200 Brady Street
PO Box 5000, Station A
Sudbury, ON, P3A 5P3

Billing customer number: 00-1091654

Contact name and phone number

Sue Horvath is the Computerized Note-taking Coordinator and will advise if there is a note-taker available to attend. Any agendas, notes etc. should be provided in advance of the meeting/event if possible.

Maple Communications: provides remote interpretation services and on-demand video remote interpreting (VRI) services.

The person who required the service is connected with an American Sign Language (ASL) interpreter via a computer or tablet which must be equipped with a microphone.

Maple Communications offers a 24/7 on-demand video remote interpreting service for shorter meetings, walk-ins or emergencies in addition to being able to schedule a remote interpreter for meetings of longer duration.

Please contact Danielle Wicklander (ext. 2011) or Christine Hodgins (ext. 2016) or email accessibility@greatersudbury.ca for more information or to book/use this service.

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4.0 FM and Infrared Amplification/Assistive Listening Devices

The City of Greater Sudbury has installed amplification/assistive listening devices in the following areas of Tom Davies Square:

- Council Chamber (FM) : Assistive Listening Device – Council Chamber.
- C-11 (Infrared): Assistive Listening Device – C-11.
- C-12 (Infrared): Assistive Listening Device – C-12.
- Foyer (FM – connected to the speaker system for the foyer/courtyard): Assistive Listening Device – Foyer.
- Portable System (FM – this system can be taken to offsite events or tours of City facilities): Assistive Listening Device – Portable.

Each room listed above has a number of receivers for the public to use with either a headset or neck loop.

4.1 Booking and Using the Devices

All devices have been added to GroupWise under the meeting room names listed above and can be booked for use in the same manner as committee rooms. Please note that these devices are not compatible for persons with cochlear implants, however they can be looped to function with hearing aids. Transmitters for each of the rooms listed above are kept in the Clerk's Services Department. The following outlines the process for obtaining the transmitter(s) for use:

- Using GroupWise select and book the device that corresponds to the meeting room. If you are holding an event off-site select the "portable" unit.
- Prior to your meeting attend the Clerk's Services Department in order to obtain a transmitter and headset for the individual who has requested the service.
- Clerk's Services Staff will provide you with the device and you will be required to complete the sign out sheet.
- At the conclusion of your meeting/event return the device to the Clerk's Services Department and sign the device back in.

The staff member responsible for organizing the event or meeting is responsible for both providing the device to the individual and ensuring that the device is returned to Clerk's Services at the conclusion of the meeting or event. Devices will not be signed out to members of the public.

5.0 Accessible Formats

The City of Greater Sudbury will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities.

When providing an accessible format or communication support, it is important for staff to work with the person making the request to determine the suitability of the format or support. Types of accessible formats may include but are not limited to:

- Large print (minimum size 12, use simple font i.e.: Arial, Calibri, Verdana, Century Gothic).
- Recorded audio / description of the information contained in the document.
- Electronic formats (PDF).
- Braille.

When creating documents for the public it is important to keep accessibility considerations in mind such as:

- Ensuring that there is a high contrast between the background and the font in the document i.e.: white background with black font.
- Use simple, easy to understand language.
- Including ALT text in order to provide a description of any included images.
- Performing accessibility checks of documents in Adobe before posting to website.
- Using formats i.e.: headings when working with documents in Word.

Once the determination has been made as to which format would be the most suitable/beneficial for the person with a disability, staff will provide the document or information in the agreed upon format in a timely manner at a cost that is no more than the regular cost charged to other persons.

6.0 Accessible Access to Council Chamber

If a person with a disability requires accessible access to Council Chamber, Security should be advised of the request and will work with the Department to make arrangements to assist individual to Council Chamber.

The person requesting the access should be directed to park in the underground municipal parking lot off of Minto Street and access the building from the parking garage.

Security will meet the individual on the main level in the lobby of Tom Davies Square or at a pre-arranged location and escort them down to Council Chamber. When the individual is ready to leave or the meeting has been concluded, Security should be contacted to assist the individual in exiting the Chamber.

Questions regarding any of the information contained in this policy should be directed to the Legislative Compliance Coordinators by emailing accessibility@greatersudbury.ca or calling ext, 4209.