



## Corporation of the Town of Cobourg

### Policy Title: Accessible Workplace and Customer Service

**Division:** General Administration  
**Effective Date:** December 1, 2020

**Department:** Human Resources  
**Revision Date:** December 1, 2021

**Approval Level:** Town Council

**Contact Person:** Accessibility Coordinator and/or Human Resources Generalist

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**Section Number:** 2-20

**Policy Number:** HR-AP-A12

#### Purpose

The Corporation of the Town of Cobourg is committed to providing quality goods and services that are accessible to all persons that we serve and in a manner that respects the dignity and independence of Persons with Disabilities.

This policy is drafted in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005*, Accessibility Standards for Customer Service (Ontario Regulation 191/11), the *Ontario Human Rights Code*.

#### Policy

The Town of Cobourg is committed to meeting its current and ongoing obligations under the *Ontario Human Rights Code* respecting non-discrimination.

The Town of Cobourg understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and its accessibility standards do not substitute or limit its obligations under the *Ontario Human Rights Code* or obligations to Persons with Disabilities under any other law.

The Town of Cobourg is committed to complying with both the *Ontario Human Rights Code* and the AODA.

The Town of Cobourg is committed to excellence in serving all customers including Persons with Disabilities.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for Persons with Disabilities.

The Regulation establishes accessibility standards specific to customer service for public sector organizations and other persons or organizations that provide goods and services to members of the public or third parties.

This policy addresses the following:

- The provision of goods and services to Persons with Disabilities,

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- Communication with a Person with a Disability,
- 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 service and facilities,
- Training,
- Customer feedback regarding the provision of goods and services to Persons with Disabilities, and
- Notice of availability and format of documents.

#### **Scope**

This policy applies to all persons who deal with members of the public or third parties on behalf of the Town, whether the person does so as an employee, member of Council, volunteer, student placement or otherwise, and all persons who participate in developing the Town's policies, practices, and procedures governing the provision of goods and services to member of the public and third parties.

#### **Application**

##### **1.0 Providing Goods, Services, or Facilities to Persons with Disabilities**

The Town of Cobourg is committed to meeting its current and ongoing obligations under the *Ontario Human Rights Code* respecting non-discrimination.

The Town of Cobourg understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its accessibility standards do not substitute or limit its obligations under the *Ontario Human Rights Code* or obligations to Persons with Disabilities under any other law.

The Town of Cobourg is committed to complying with both the *Ontario Human Rights Code* and the AODA.

The Town of Cobourg is committed to excellence in serving all customers including Persons with Disabilities.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration, and equality of opportunity for Persons with Disabilities.

##### **2.0 Assistive Devices**

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Persons with Disabilities may use their personal assistive devices when accessing our goods, services, or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the Person with a Disability can access our goods, services or facilities.

We will ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services or facilities.

It is the responsibility of the Person with a Disability to ensure that their assistive device is operated in a controlled and safe manner at all times.

#### **3.0 Communication**

Communications from the Town of Cobourg to a Person with a Disability will be provided in such a manner which takes into account an individual's disability and addresses such forms as print material, social media posts, Council documents, video content, and the municipal website.

##### **3.1 Communicating with the Public**

Staff members who communicate with customers will be trained on how to interact and communicate with people who have various types of disabilities. This includes how to communicate with persons over the telephone in clear and plain language, to speak clearly, and to tailor their responses as much as possible in support of the individual.

##### **3.2 The Town's Website**

It shall be the policy of the Town of Cobourg to ensure that its website meets the World Wide Web Consortium Accessibility Guidelines 2.0 Level AA.

The Town will, upon request, provide or arrange for the provision of accessible formats and communication supports for Persons with Disabilities. Staff will consult with the requester on the most appropriate format and will make every effort to provide such information in a timely manner.

##### **3.3 Council Documents and Public Information**

The Town of Cobourg will ensure that all Persons with Disabilities are able to access all important documents and public information, including Council documents and others necessary to engage in public participation. Any questions customers may have about the content of a document will be answered in person, by telephone, or e-mail.

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#### **3.4 Correspondence, Invoices, and Other Documentation**

The Town is committed to providing accessible information to the public. For this reason, upon request, correspondence, invoices, and other documentation will be provided in large print or by e-mail.

Staff may provide a document, or information contained in a document, in a format that takes into account the person's disability. Staff and the Person with a Disability may agree upon the format to be used for the document or information.

Any questions customers may have about the content of a document will be answered in person, by telephone, or e-mail.

#### **4.0 Service Animals**

We are committed to welcoming Persons with Disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties.

If a guide dog or other service animal accompanies a visiting Person with a Disability, the Town shall ensure that the person is permitted to enter the premises with the animal and keep the animal with them.

##### **4.1 Exceptions to the Rule**

Service animals will not be permitted:

- Where food preparation is being undertaken, and/or
- As otherwise disallowed by law.

If a service animal is excluded by law, the Town will ensure that alternate means are available to enable the Person with a Disability to obtain, use or benefit from the Town's goods and services. We will do the following to ensure Persons with Disabilities can access our goods, services or facilities by:

- Explaining why the animal is excluded, and/or
- Discussing with the customer another way of providing goods, services, or facilities.

##### **4.2 Recognizing a Service Animal**

When we cannot easily identify that an animal is a service animal, our staff may ask a person to provide documentation (template, letter, or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

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A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

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 of 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 of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

#### **4.3 Care and Control of the Animal**

The Persons with a Disability who is accompanied by a service animal must maintain care and control of the animal at all times.

#### **4.4 Allergies**

If a customer or staff member has a severe allergy to animals, which could result in health and safety concerns, the Town shall make reasonable efforts to meet the needs of all individuals.

#### **5.0 Support Persons**

The Town is committed to welcoming people with disabilities who are accompanied by a support person. If a support person accompanies a visiting Person with a Disability, the Town shall ensure that both persons are entitled 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.

##### **5.1 When a Support Person may be Required**

The Town may require a visiting person with a disability to be accompanied by a support person when on the premises, but only if a support person is necessary to protect the health or safety of the Person with a Disability or the health and safety of others on the premises.

##### **5.2 Fees and Admission**

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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 Town shall 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 fees are posted.

#### **6.0 Notice of Temporary Disruption**

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities the Town of Cobourg will notify customers promptly.

##### **6.1 Unplanned Service Disruptions**

This clearly posted notice will include:

- Information about the reason for the disruption,
- Its anticipated length of time, and
- A description of alternative facilities or services, if available.

Notice may be given by posting the information at a conspicuous place at the municipal office and other relevant premises owned or operated by the municipality, and by posting it on the municipality's website or by such other method as is reasonable in the circumstances.

##### **6.2 Planned Service Disruptions**

In the event of a planned disruption to occur on a specified date(s), notice shall be provided:

- On-site,
- The municipal website, and
- Contact directly with an individual with a pre-scheduled appointment, as applicable.

#### **7.0 Training**

The Town of Cobourg will provide accessible customer service training to:

- All employees and volunteers,
- Anyone involved in developing our policies, and
- Anyone who provides goods, services, or facilities to customers on our behalf.

##### **7.1 Training Schedule**

Staff will be trained on accessible customer service before their work term begins or within ten (10) days after being hired. Any additional training that is specific or niche to a position will be conducted within thirty (30) days after being hired.

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#### **7.2 Training Subjects**

Training will include:

- The purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the customer service standard,
- The Town of Cobourg's policies related to the Customer Service Standard in *Ontario Regulation 191/11*,
- How to interact and communicate with people with various types of disabilities,
- How to interact with Persons with Disabilities who use an assistive device or require the assistance of a service animal or a support person,
- How to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to Persons with Disabilities, and
- What to do if a Person with a Disability is having difficulty in accessing the Town of Cobourg's goods, services, or facilities.

Staff will also be trained when changes are made to our accessible customer service policies.

#### **7.3 Training Records**

Training records shall be kept, including the dates when the training is provided, number of individuals to whom the training was provided and the signature of all those individuals trained on a particular date.

#### **8.0 Feedback Process**

The Town of Cobourg welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Customers who wish to provide feedback on the way the Town of Cobourg provides goods, services or facilities to Persons with Disabilities can provide feedback in the following way(s):

- Through our Report It feature on the website,
- In person,
- By telephone, and
- By email.

All feedback, including complaints, will be handled in the following manner:

- A service notification will be given to the Accessibility Coordinator,
- The Accessibility Coordinator

Customers can expect to hear back within seven (7) business days.

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The Town of Cobourg will make sure our feedback process is accessible to Persons with Disabilities by providing or arranging for accessible formats and communication supports, on request.

#### 9.0 Notice of Availability of Documents

The Town of Cobourg will notify the public that documents related to accessible customer service, are available upon request [by contacting the Accessibility Coordinator](#).

In addition, a copy of this policy is available on [the Town's website under the Accessibility section](#).

The Town of Cobourg will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and, at no additional cost.

#### 10. Modifications to This or Other Policies

Any policies of the Town of Cobourg that do not respect and promote the principles of dignity, independence, integration and equal opportunity for Persons with Disabilities will be modified or removed.

#### Administration

The Chief Administrative Officer shall implement and administer the terms of this policy and shall establish related operating procedures as required. This will be done with the assistance of the Accessibility Coordinator.

#### Cross Reference

Other relevant documents and legislation:

- [Accessibility for Ontarians with Disabilities Act, 2005](#),
- [Accessible Customer Service Policy](#),
- [Accessible Workplace Policy](#),
- [Early and Safe Return to Work](#),
- [Integrated Accessibility Standards, Ontario Regulation 191/11](#),
- [Ontario Human Rights Code](#),
- [Town of Cobourg's Accessibility Advisory Committee](#),
- [Town of Cobourg's Multi-Year Accessibility Plan](#), and
- [Town of Cobourg's Transportation Multi-Year Accessibility Plan](#).