

<b>Section:</b>	<b>GENERAL</b>	<b>Approval Date:</b>	<b>2014-11-17</b>
<b>Title:</b>	<b>ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES-MULTI YEAR PLAN</b>	<b>Supersedes:</b>	<b>NEW</b>
<b>Motion No.:</b>	<b>2014-GSUI-IC-05-11</b>	<b>Review Date:</b>	<b>2017-11-17</b>
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**Multi-Year Accessibility Plan and Policies for Greater Sudbury Utilities**

This 2014-21 accessibility plan outlines the policies and actions that Greater Sudbury Utilities will take to improve opportunities for people with disabilities.

**Statement of Commitment**

Greater Sudbury Utilities is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

**Accessible Emergency Information**

Greater Sudbury Utilities is committed to providing our customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

**1. Customer Service Standard**

Greater Sudbury Utilities strives at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar manner as other customers.

Note that the policy may be revised as other standards are introduced under the Accessibility for Ontarians with Disabilities Act, 2005.

**Providing goods and services to people with disabilities**

Greater Sudbury Utilities is committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:



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**Communication**

We will communicate with people with disabilities in ways that take into account their disability. We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities.

**Assistive devices**

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure that our staff is trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services, as required.

**Use of service animals and support persons**

We are committed to welcoming people with disabilities who are accompanied by a service animal on the areas of our premises that are open to the public. We will also ensure that all staff and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal. Any person with a disability who is accompanied by a support person will be allowed to enter Greater Sudbury Utilities' premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

**Notice of temporary disruption (Service at 500 Regent Street)**

Greater Sudbury Utilities will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed in a conspicuous place on the facility or by other reasonable methods, as appropriate.

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**Training**

Greater Sudbury Utilities will provide training to all persons to whom this policy applies as required by the Accessibility Standards for Customer Service, others who deal with the public or other third parties on our behalf, and all those who are involved in the development of customer service policies, practices and procedures.

Training will include the following:

- The purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard (O.Reg. 429/07);
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- What to do if a person with a disability is having difficulty in accessing Greater Sudbury Utilities' goods and services;
- This training will be provided for all applicable employees during orientation (computer based training).

Staff will also be trained on an ongoing basis when changes are made to these policies, procedures, and practices.

Greater Sudbury Utilities will provide training to employees, volunteers and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members.

Greater Sudbury Utilities will take the following steps to meet the requirements under the Act to ensure employees are provided with the training needed to meet Ontario's accessible laws; **January 1, 2015:**

- AODA training is a requirement for every new employee;
- Every employee shall be trained as soon as practicable;
- Training records are to be kept as per AODA requirements. This includes the dates on which the training is provided and the number of individuals to whom it is provided;
- Training shall be provided in respect to any changes to policies on an on-going basis;

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## 2. Information and Communication Standard

Greater Sudbury Utilities is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

Greater Sudbury Utilities **must** take the following steps to meet the requirements under the Act to make all new websites and content on those sites conform with WCAG 2.0, Level A; **January 1, 2014:**

- Provide captions and text alternatives for images and multimedia;
- Use strong contrast between text and background;
- Create content that can be presented using assistive technologies (such as screen readers) without losing meaning;
- Use structured content and make it keyboard accessible;
- Avoid CAPTCHAs and give users enough time to read and use content;
- Avoid using time limits when asking users to provide a response or information;
- Avoid blinking images;
- Help users navigate and find content;
- Help users avoid and correct mistakes;
- Make tables accessible.

Greater Sudbury Utilities will take the following steps to ensure existing feedback processes are accessible to people with disabilities upon request:

- Notify the public about the availability of accessible formats and communication supports.

Greater Sudbury Utilities will take the following steps to make sure all publicly available information is made accessible upon request:

- Provide the information in a timely manner that takes into account the person's accessibility needs due to disability;
- Provide the information at a cost that is no more than the regular cost charged to other persons;
- Will consult with the person making the request in determining the suitability of an accessible format or communication support;

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- Notify the public about the availability of accessible formats and communication supports.

Greater Sudbury Utilities **must** take the following steps to meet the requirements under the Act to ensure all websites and content conform with WCAG 2.0, Level AA; **January 1, 2021**:

- Provide captions and text alternatives for images and multimedia;
- Use strong contrast between text and background;
- Create content that can be presented using assistive technologies (such as screen readers) without losing meaning;
- Use structured content and make it keyboard accessible;
- Avoid CAPTCHAs and give users enough time to read and use content;
- Avoid using time limits when asking users to provide a response or information;
- Avoid blinking images;
- Help users navigate and find content;
- Help users avoid and correct mistakes;
- Make tables accessible.

### **3. Employment Standards**

#### **Employment**

Greater Sudbury Utilities is committed to fair and accessible employment practices.

We will take the following steps to meet the requirements under the Act to notify the public and staff that, when requested, Greater Sudbury Utilities will accommodate people with disabilities during the recruitment and assessment processes and when people are hired; **January 1, 2016**:

- Notifying our employees and the public about the availability of accommodation for applicants with disabilities in our recruitment processes;
- During a recruitment process, GSU shall notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used;
- If a selected applicant requests an accommodation, GSU shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability;

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- When making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities;
- Inform our employees of its policies used to support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability;
- Provide the information required under this section to new employees as soon as practicable after they begin their employment;
- Provide updated information to our 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 disability;
- Where an employee with a disability so requests it, GSU shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace;
- Consult with the employee making the request in determining the suitability of an accessible format or communication support;
- Provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and GSU is aware of the need for accommodation due to the employee's disability;
- If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, GSU shall provide the workplace emergency response information to the person designated by GSU to provide assistance to the employee;
- Provide the information required under this section as soon as practicable after GSU becomes aware of the need for accommodation due to the employee's disability;
- GSU shall review the individualized workplace emergency response information, when the employee moves to a different location in the organization; when the employee's overall accommodations needs or plans are reviewed; and when GSU reviews its general emergency response policies.

Greater Sudbury Utilities will take the following steps for employees that have been absent due to a disability in conjunction with existing return to work policies and procedures:

- Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities

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The process for the development of documented individual accommodation plans shall include the following elements:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
  2. The means by which the employee is assessed on an individual basis.
  3. The manner in which GSU can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
  4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
  5. The steps taken to protect the privacy of the employee's personal information.
  6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
  7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
  8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.
- Individual accommodation plans shall, if requested, include any information regarding accessible formats and communications supports provided, if required, include individualized workplace emergency response information, and identify any other accommodation that is to be provided.
  - The return to work process shall, outline the steps GSU will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and use documented individual accommodation plans, as described in section 28 of the Act, as part of the process.

We will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account if Greater Sudbury Utilities is using performance management, career development and redeployment processes.

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Greater Sudbury Utilities will take the following steps to prevent and remove other accessibility barriers identified:

- Greater Sudbury Utilities shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.
- Greater Sudbury Utilities shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

#### **4. Built Environment Standard**

Greater Sudbury Utilities is committed to meeting the built environment requirements for people with disabilities. We will take the following steps to meet the requirements under the Act: **January 1, 2017.**

##### **For exterior paths of travel:**

Greater Sudbury Utilities will take the following steps to ensure that newly built or redeveloped exterior paths of travel are accessible for people with disabilities. Greater Sudbury Utilities will ensure that new and redeveloped exterior paths of travel meet the requirements set out by Ontario Regulation 191/11, Accessibility for Ontarians with Disabilities Act, 2005, Integrated Accessibility Standards: 80.21

##### **For exterior paths of travel, ramps:**

Where an exterior path of travel is equipped with a ramp, Greater Sudbury Utilities will ensure the ramp meets the requirements as outlined by Ontario Regulation 191/11, Accessibility for Ontarians with Disabilities Act, 2005, Integrated Accessibility Standards: 80.24

##### **Exterior paths of travel, stairs:**

Where stairs connect to exterior paths of travel, Greater Sudbury Utilities will ensure the stairs meet the requirements as outlined by Ontario Regulation 191/11, Accessibility for Ontarians with Disabilities Act, 2005, Integrated Accessibility Standards: 80.25



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**Exterior paths of travel, curb ramps:**

Where a curb ramp is provided on an exterior path of travel, Greater Sudbury Utilities will ensure that the curb ramp aligns with the direction of travel and meets the requirements as outlined by Ontario Regulation 191/11, Accessibility for Ontarians with Disabilities Act, 2005, Integrated Accessibility Standards: 80.26

**Exterior paths of travel, depressed curbs:**

Where a depressed curb is provided on an exterior path of travel, Greater Sudbury Utilities will ensure that the depressed curb meets the requirements as outlined by Ontario Regulation 191/11, Accessibility for Ontarians with Disabilities Act, 2005, Integrated Accessibility Standards: 80.27

**Accessible Parking**

**Off-Street Parking:**

Greater Sudbury Utilities will ensure that when constructing new or redeveloping off-street parking facilities that we intend to maintain, the off-street parking facilities and meet the requirements set out in this Part. O. Reg. 413/12, s. 6.

**Access Aisles:**

Greater Sudbury Utilities will ensure that access aisles, that is the space between parking spaces that allows persons with disabilities to get in and out of their vehicles, will be provided for all parking spaces for the use of persons with disabilities in off-street parking facilities. O. Reg. 413/12, s. 6.

**Minimum number and type of accessible parking spaces:**

Greater Sudbury Utilities will ensure that off-street parking facilities have a minimum number of parking spaces for the use of persons with disabilities, in accordance with Ontario Regulation 191/11, Accessibility for Ontarians with Disabilities Act, 2005, Integrated Accessibility Standards: 80.36.

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**Signage:**

Greater Sudbury Utilities will ensure that parking spaces for the use of persons with disabilities as required under section 80.36 are distinctly indicated by erecting an accessible permit parking sign in accordance with section 11 of Regulation 581 of the Revised Regulations of Ontario, 1990 (Accessible Parking for Persons with Disabilities) made under the *Highway Traffic Act*. O. Reg. 413/12, s. 6. and in accordance with Ontario Regulation 191/11, Accessibility for Ontarians with Disabilities Act, 2005, Integrated Accessibility Standards: 80.37.

**Obtaining Service**

**Service counters:**

Greater Sudbury Utilities will ensure that when constructing new service counters, which includes replacing existing service counters all the requirements of Ontario Regulation 191/11, Accessibility for Ontarians with Disabilities Act, 2005, Integrated Accessibility Standards: 80.41, are met.

**Waiting areas:**

Greater Sudbury Utilities will ensure that when constructing a new waiting area or redeveloping an existing waiting area, where the seating is fixed to the floor, a minimum of three percent of the new seating will be accessible, with a minimum of one accessible seating space. O. Reg. 413/12, s. 6.

**Maintenance**

**Maintenance of accessible elements:**

Greater Sudbury Utilities will ensure that in addition to the accessibility plan requirements set out in section 4 of the Ontario Regulation 191/11, Accessibility for Ontarians with Disabilities Act, 2005, Integrated Accessibility Standards, that our multi-year accessibility plans include the following:

1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part.

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2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order. O. Reg. 413/12, s. 6.

### **Feedback Process**

The ultimate goal of Greater Sudbury Utilities and its affiliates is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are met are welcome and appreciated.

Feedback may be provided on the accessibility of the provision of the goods and services by G.S.U. and its affiliates in a manner deemed most convenient to our customers. Customers who wish to provide feedback on the way G.S.U. provides goods or services to people with disabilities, can email GSU at [pr@gsuinc.ca](mailto:pr@gsuinc.ca). All feedback will be kept confidential.