



Naturally Spirited

**Corporation of the
Township of Killaloe, Hagarty and Richards
2024-2029**

Multi-Year Accessibility Plan

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Accessibility Multi-Year Plan; Township of Killaloe, Hagarty and Richards

This multi-year Accessibility Plan is developed in accordance with the Integrated Accessibility Standards Regulation under the *Accessibility for Ontarians with Disabilities Act, 2005*. The Plan describes the measures that the Township of Killaloe, Hagarty and Richards will take over the five-year period from 2024 – 2029 to identify, remove and prevent barriers to people with disabilities who work, learn and participate within the Township of Killaloe, Hagarty and Richards' environment including staff, volunteers and visitors.

This policy is intended to provide a framework to guide the review and development of the Township of Killaloe, Hagarty and Richards' policies, standards, procedures, by-laws and guidelines to comply with the Integrated Accessibility Standards Regulation (Ontario Regulation 191/11) developed under the *Accessibility for Ontarians with Disabilities Act, 2005*, S.O. 2005, C11 (the AODA).

Under the *Accessibility for Ontarians with Disabilities Act, 2005*, all public and private sector organizations must meet the requirements of accessibility standards established by the regulation. This accessibility multi-year plan outlines the policies and actions that the Township of Killaloe, Hagarty and Richards will put in place to improve opportunities for people with disabilities.

Statement of Commitment

The Township of Killaloe, Hagarty and Richards is committed to providing services that are free of barriers and biases. We strive to ensure that key principles of independence, dignity, integration and equality of opportunity are reflected and valued in our working environments. Our conduct will demonstrate our belief in the strength that diversity brings to our community. We are committed to meeting the needs of people with disabilities and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act*.

It is the policy of the Township of Killaloe, Hagarty and Richards to provide an environment in all of its facilities that fosters independence, dignity and respect for everyone. We are committed to ensuring that people with disabilities have the same opportunity of access to our services in a similar way these services are available to all others we serve. The Township of Killaloe, Hagarty and Richards is committed to meeting the accessibility needs of people with disabilities, in a timely manner in the provision of services related to information, communication, employment and in the accessibility to our facilities.

We are committed to providing services, programs, goods and facilities to people with disabilities in a manner that;

- ✓ is free from discrimination;
- ✓ provides accessible formats and communication supports where possible;
- ✓ seeks to provide integrated services;
- ✓ provides opportunities equitable to others to obtain, use and benefit from the goods or services we offer; and

- ✓ takes into consideration a person's disability.

The Township of Killaloe, Hagarty and Richards' vision and commitment to building inclusive environments continuously grows strong. Our goal is to make our workplaces and customer service departments accessible, welcoming environments – places where both employees and customers are accommodated according to their needs.

Barriers to be Addressed Under the Plan

The Township of Killaloe, Hagarty and Richards intends, through this Multi-Year Accessibility Plan for the period 2024 – 2029, to take action to address barriers to accessibility related to the Standards set by current Regulations.

Legislative Authority

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (AODA), which requires that Ontario be an accessible province by 2025. Public, private and not-for-profit organizations must create a multi-year accessibility plan and accessibility policies. To assist in identifying, preventing and removing barriers to accessibility; the AODA requires organizations to have in place accessibility standards in the following areas;

- ✓ Customer Service;
- ✓ Information and Communications;
- ✓ Employment;
- ✓ Transportation; and
- ✓ The Built Environment.

Our Accessibility Compliance Objectives

To meet and sustain accessibility compliance, the Township of Killaloe, Hagarty and Richards will revise existing policies and or develop new ones with accessibility in mind. Policies and guiding principles assist staff integrate accessibility objectives into everyday activities and ensure that objectives are communicated and delivered in a consistent way.

The Township of Killaloe, Hagarty and Richards is committed to ensuring accessibility is considered first in all aspects of business we provide. We will provide staff training on accessibility, accessible formats, and communications guidelines will be produced. We will increase awareness of accessibility best practices in customer service and the workplace and we will conduct management reviews on accommodation for employees with disabilities.

The Township of Killaloe, Hagarty and Richards is committed to the increased awareness of barrier-free guidelines for new builds, major retrofits and lease agreements. We will continue to develop strategies for addressing these infrastructure barriers.

Our Development and Goals for the Future

The Township of Killaloe, Hagarty and Richards is committed to meeting AODA Accessibility Standards through the following; General Requirements, Customer Service Standards,

Procurement, Information and Communication, Employment, Transportation and Design of Public Spaces.

General Requirements

The Township of Killaloe, Hagarty and Richards is committed to meeting AODA Accessibility Standards through the implementation of Accessibility Policies, Accessibility Plans, Training and Self-Service Kiosks.

Accessibility Policies

The Township of Killaloe, Hagarty and Richards is committed to developing policies, including a statement of organizational commitment, on how to meet the integrated standards requirements, make them available to the public, and provide them in an accessible format, upon request.

Accessibility Plans

In accordance with the requirements of the regulations set out in the AODA, the Township of Killaloe, Hagarty and Richards shall update its Multi-Year Accessibility Plan which will outline the strategies we will use to prevent and remove barriers to accessibility. Each year we will review progress and evaluate the effectiveness of implementation of barrier-removal and prevention strategies, we will work closely with departments to plan for increased accessibility throughout the Township, post the information on the Township website and provide such information in accessible formats upon request. The plan will be reviewed and updated at least once every five years.

Training

The Township of Killaloe, Hagarty and Richards will provide accessibility training to all employees, volunteers, third parties and all other persons who provide goods, services or facilities on the Township's behalf, as well as those who develop the policies, practices and procedures governing the provision of goods or services to members of the public or other third parties. The training provided shall be appropriate to the duties of the employee, volunteer or third party. Training shall take place as soon as is practicable and upon completion, the Township shall keep a record of the training provided, including the dates on which accessibility training took place.

Self Service Kiosks

The Township of Killaloe, Hagarty and Richards does not offer self-service kiosks. If considered at another time the Township will take all the necessary steps to make them accessible to people with disabilities so they can be used independently and securely.

Customer Service Standards

The Township of Killaloe, Hagarty and Richards is committed to providing services in an accommodating environment and receive accessible goods and services in a timely manner.

Assistive Devices, Service Animals and Support Persons

Township of Killaloe, Hagarty and Richards' employees, volunteers and third parties shall accommodate the use of personal assistive devices including, but not limited to, wheelchairs, canes, walkers, scooters, etc.

Persons with disabilities, accompanied by a guide dog or other service animal and accessing goods, services or facilities that are provided to members of the public or other third parties at premises owned or operated by the Township of Killaloe, Hagarty and Richards, shall be permitted to enter the premises with the animal and to keep the animal with them, unless the animal is otherwise excluded by law from the premises (for example, in food preparation areas as prohibited by *Food Premises, R.R.O. 1990, Reg. 562* under the *Health Protection and Promotion Act, R.S.O. 1990, c. H.7*).

If a service animal is excluded by law from the premises, the Township shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities.

An animal is a service animal for a person with a disability if:

- a) the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
- b) the person provides documentation from a regulated health professional, described in Section 80.45 (4) of the IASR, confirming that the person requires the animal for reasons relating to the disability; or
- c) the person provides other forms of identification, such as a guide dog identification card from the Ontario Ministry of the Attorney-General.

If a person with a disability is accompanied by a support person, the Township shall permit both persons to enter the premises together and the person with a disability is not prevented from having access to the support person while on the premises.

If the Township charges an admission fee to a support person, the Township shall ensure that notice is given in advance about the amount, if any, that is payable in respect of the support person accompanying a person with a disability.

As per *Section 80.47(5)* of the IASR, the Township may require that a person with a disability be accompanied by a support person when on Township premises or participating in Township-run programs, but only if, after consulting with the person with a disability, Township staff determine that:

- a) the support person is necessary to protect the health and safety of the person with a disability and the health and safety of others on the premises; and,
- b) there is no other reasonable way to protect the health or safety of the person with a disability and the health and safety of others on the premises.

In such instances, the Township shall waive any amount payable in respect of the support person's admission to the premises or in connection with the support person's presence on the premises.

Procurement

The Township of Killaloe, Hagarty and Richards is committed to incorporating accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not possible to do so.

Information and Communication

The Township of Killaloe, Hagarty and Richards will create, provide and receive information and communications in ways that are accessible for people with disabilities as it relates to Feedback, Complaints, Notice of Service Disruption, Accessible Formats and Communication Supports, Emergency Procedures, Plans or Public Safety Information, Accessible Websites and Web Content and Public Libraries.

Feedback/Suggestions

The Township of Killaloe, Hagarty and Richards is committed to ensuring that processes for receiving and responding to feedback/suggestions is accessible for persons with disabilities. Persons wishing to provide feedback/suggestions can do so by completing the "Feedback/Suggestion Form" (page 17).

To submit feedback/suggestion:

- (a) Member of the public will inform staff member of the feedback/suggestion.
- (b) Staff member will assist member of the public in filling out the feedback/suggestion form, should they require assistance.
- (c) Member of the public will be notified in a timely manner of how the Township of Killaloe, Hagarty and Richards will proceed with their feedback/suggestion.
- (d) Staff response should include: an explanation of how we will implement the feedback/suggestion, a response indicating further investigation or an explanation why we are unable to implement the feedback/suggestion.

Complaints

The Township of Killaloe, Hagarty and Richards is committed to ensuring that processes for receiving and responding to complaints are accessible for persons with disabilities. Persons wishing to submit a complaint can do so by completing the "Complaint Form" (page 18).

To submit a complaint:

Should a member of the public wish to make a complaint regarding the service they have received:

- (a) The member of the public with the complaint or concern should have a discussion with the staff person at the Township of Killaloe, Hagarty and Richards who is involved in the situation.
- (b) Should the discussion not resolve the complaint, or the member of the public is uncomfortable discussing the issue with the staff person, the member of the public should fill out a complaint form. The staff person can assist the member of the public with the complaint form in a manner that takes into consideration their disability.
- (c) The information to be provided by the member of the public should include their personal contact information, the date, a description of the complaint, and what the member of the public requests to resolve the complaint. This information should be documented on the complaint form.
- (d) The complaint should be forwarded to the Supervisor responsible for the department.
- (e) The Department Head will attempt to resolve the complaint in a timely manner, with the assistance of the appropriate Township department.
- (f) The member of the public will be contacted once a resolution has been reached.

Unreasonable Requests will be addressed in accordance with Appendix "B" of this policy (page 22)

All complaints and feedback/suggestions should be recorded on a complaint form and forwarded to the Department Head and Council for appropriate resolution and/or accommodation.

Notice of Service Disruption

In the event that there is a temporary service disruption in the availability of facilities, services or goods used by persons with disabilities, the Township shall give notice to the public of the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, that are available. Such notices are provided by a variety of methods, depending on the circumstances. They may include postings in conspicuous places at the affected premises, in other Township facilities, and on the Township's website.

Accessible Formats and Communication Supports

The Township of Killaloe, Hagarty and Richards is committed to providing accessible formats and communications supports for persons with disabilities in a timely manner and at a cost that is no more than the regular cost charged to other persons, upon request by completing

the "Request for Document in Alternate Format Form" (page 16). The Township will also notify the public about the availability of accessible formats and communication supports.

This does not apply to products and product labels, unconvertible information or communications and information that the municipality does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, the department shall provide the person requesting the information or communication with:

- an explanation as to why the information or communication is unconvertible; and
- a summary of the unconvertible information or communications.

Emergency Procedure, Plans or Public Safety Information

The Township of Killaloe, Hagarty and Richards is committed to providing emergency procedures, plans or public safety information which is publicly available in an accessible format or with appropriate communication supports, upon request.

Accessible Websites and Web Content

The Township of Killaloe, Hagarty and Richards is committed to ensuring that all new internet websites and web content conforms with Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A initially and increasing to Level AA. By January 1, 2014, any new web content will conform to WCAG 2.0 Level A and by January 1, 2021 all internet website and web content will conform to WCAG 2.0 Level AA.

Public Libraries

The Killaloe and District Public Library will provide access to/or arrange for, accessible materials where they exist. They will make information about accessible materials publicly available and provide it in an accessible format or with appropriate communication supports, upon request. The Killaloe and District Public Library will also provide accessible formats for archival materials, special collection, rare books and donations. They will continue to be a member of CNIB Partners Program and ensure the library website meets compliance.

Employment

The Township of Killaloe, Hagarty and Richards is committed to creating employment practices and its workplace more accessible to potential and existing employees as it relates to Recruitment, Informing Employees of Supports, Accessible Formats and Communication Supports for Employees, Workplace Emergency Response, Documented Individual Accommodations Plans, Return to Work Process, Performance Management, Career Development and Advancement and Redeployment.

Recruitment

The Township of Killaloe, Hagarty and Richards will notify employees and the public about availability of accommodation for applicants with disabilities during the recruitment processes. If a selected applicant requests an accommodation, the Township shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability. The Township will notify successful applicants of the policies for accommodating employees with disabilities when making offers of employment.

Informing Employees of Supports

The Township of Killaloe, Hagarty and Richards is committed to informing new and existing employees of policies for supporting employees with disabilities, including providing employment-related accommodations for disabilities.

Accessible Formats and Communication Supports for Employees

The Township of Killaloe, Hagarty and Richards is committed to consulting with their employees who have a disability in order to provide them with the accessible formats and communications support they require to do their jobs effectively and to be informed of information that is generally available to all employees in the workplace.

Workplace Emergency Response

The Township of Killaloe, Hagarty and Richards is committed to preparing for the specific needs that employees with disabilities may have in emergency situations. If an employee's disability is such that workplace emergency response information is necessary and the Township is aware of the need for accommodation, this information shall be provided to employees. In addition, this information shall be provided, with the employee's consent, to the person designated to provide assistance. The information shall undergo review when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when the Township reviews its general emergency response plan.

Documented Individual Accommodation Plans

The Township of Killaloe, Hagarty and Richards is committed to develop, implement and maintain a written process for documentation of individual accommodation plans for employees with disabilities. If requested these plans shall include information regarding accessible formats and communications supports and/or individualized workplace emergency response information.

Return to Work Process

The Township of Killaloe, Hagarty and Richards is committed to developing a return to work process for employees who have been absent from work due to a disability and require disability-related accommodations to return to work.

Performance Management

The Township of Killaloe, Hagarty and Richards will consider accessibility needs of employees with disabilities and individual accommodation plans during the performance management process.

Career Development and Advancement

The Township of Killaloe, Hagarty and Richards shall take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans, when providing career development and advancement.

Redeployment

In circumstances where redeployment is considered, the Township of Killaloe, Hagarty and Richards will take into consideration the accessibility needs of the employee, and individual accommodation plans when using this process.

Transportation

The Township of Killaloe, Hagarty and Richards does not provide transportation nor does it regulate taxis. If considered at another time, the Township will adhere to AODA regulation.

Design of Public Spaces

The Township of Killaloe, Hagarty and Richards will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Public spaces include:

- recreational trails and beach access routes;
- outdoor public eating areas such as rest stops or picnic areas;
- outdoor play spaces, including playgrounds in provincial parks and local communities;
- outdoor paths of travel such as sidewalks, ramps, stairs, curb ramps, rest areas, and accessible pedestrian signals;
- accessible off-street parking;
- service-related elements such as service counters, fixed queuing lines, and waiting areas.

The Township is committed to greater accessibility into, out of, and around its facilities. Accessibility will be incorporated into the design criteria of public spaces whenever renovations or major modifications are undertaken.

Procedures for Preventative and Emergency Maintenance of the Accessible Elements in Public Spaces as Required

To ensure that all accessible elements in public spaces remain safe, functional, and usable by people with disabilities, the Township will follow preventative and emergency maintenance practices in compliance with accessibility legislation.

Inspection and maintenance tasks will include:

- checking surface conditions such as evenness, erosion, or obstacles, maintaining ramps, boardwalks, and railings, removing debris, and ensuring signage is visible;
- inspecting tables and benches for stability, maintaining accessible seating and pathways, ensuring trash and recycling receptacles do not obstruct access, and maintaining shade structures;
- inspecting playground equipment for damage or wear, ensuring surfacing is safe, firm, and slip-resistant, and checking ramps, transfer platforms, and safety barriers;
- inspecting outdoor travel paths for cracks, uneven areas, or hazards, maintaining ramps, handrails, and tactile indicators, checking lighting and pedestrian signals, and clearing snow, ice, and debris;
- ensuring accessible parking spaces are clearly marked, checking signage and curb cuts, maintaining smooth surfaces, and removing obstacles;
- checking service counters for height and accessibility, ensuring queuing lines are clear, maintaining accessible seating, and inspecting barriers, signage, and communication devices.

Emergency maintenance procedures will be followed whenever a hazard is reported or observed that may affect accessibility or safety.

Immediate responses include:

- securing or cordoning off hazards to prevent injury;
- providing temporary alternate routes or signage for inaccessible areas.

Assessment and repair procedures include:

- conducting a rapid assessment to determine the severity of the issue and the necessary repair;
- prioritizing urgent repairs that affect public safety and accessibility;
- completing repairs as quickly as possible, with longer-term fixes scheduled as needed.

Communication practices include:

- notifying the public of disruptions through the Township website, social media, and posted notices;
- recording all emergency maintenance actions and outcomes for accountability and reporting.

Examples of emergency maintenance responses include:

- a fallen tree blocking a trail being immediately cordoned off, followed by debris removal and surface repair;
- a damaged curb ramp being marked with temporary signage, repaired for safe use, and scheduled for permanent reconstruction;
- broken playground equipment being closed immediately, repaired or replaced, and communicated to the public.

The Township also recognizes the importance of training. Staff involved in maintenance and emergency response will be trained in:

- accessibility standards and legislation;
- safe maintenance of accessible elements;
- responding to accessibility complaints and hazards.

Refresher training will be provided as needed or when standards change.

Finally, the Township will ensure ongoing monitoring and continuous improvement by regularly reviewing inspection records, and emergency repair reports, incorporating feedback from residents with disabilities, and adjusting inspection frequencies, repair protocols, and budget priorities as needed.

Our Commitment

The Township of Killaloe, Hagarty and Richards is committed to making accessibility throughout the Township a reality. Our multi-year plan is our pledge that our accessibility goals are/will be met. The Township will use reasonable efforts to ensure that policies, programs and services, procedures and practices are established to provide accessible service to persons with disabilities.

Communication of the Plan

The Plan will be posted on the Township of Killaloe, Hagarty and Richards website and will be available in accessible format upon request by filling out the attached Request for Document in Alternate Format form (page 15). Questions, comments or feedback regarding the Accessibility Plan may be directed to:

Township of Killaloe, Hagarty and Richards – Administration Department
1 John Street, PO Box 39, Killaloe ON K0J 2A0
E-mail: info@khrtownship.ca / Fax: 613-757-3634

This document is available on the Municipal Website at www.killaloe-hagarty-richards.ca

APPENDIX "A"

Definitions

The terms identified and defined below are intended to provide assistance in understanding the material in this Accessibility Policy;

Accessibility: a general term used to describe the degree of ease that something (e.g. device, service, environment) can be used and enjoyed by persons with a disability. The term implies conscious planning, design and /or effort to ensure it is barrier-free to persons with a disability and, by extension, highly usable and practical for the general population.

Accessibility for Ontarians with Disabilities Act (AODA), 2005: the purpose of the Act is to develop, implement and enforce accessibility standards in order to remove barriers for Ontarians with disabilities on or before January 1, 2025 in relation to goods, services, facilities, accommodations, employment, facilities, structures and premises. The AODA came into force on June 4, 2005.

Accessible: that which can be easily reached or obtained; a facility that can be easily entered; posing no obstacles to persons with disabilities.

Accessible Formats: formats that are an alternative to standard print and are accessible to people with disabilities. Some examples include, but are not limited to large print, Braille, recorded audio and electronic formats such as DVD's and CD's.

Adaptive Technologies: technologies that enable persons with disabilities, primarily physical disabilities, to use regular versions of products such as computers or telephones.

Assistive Devices: equipment that assists people to perform a given task; usually devices that people bring with them, such as a walker, scooter, wheelchair or personal oxygen tank.

Assistive Technology: technological devices that have been developed with features specifically helpful for people with disabilities. Publishers may be asked to supply file formats that are compatible with particular types of assistive technology.

Communications: the interaction between two or more persons or entities, where information is provided, sent or received.

Communication Supports: supports that individuals with disabilities may need to access information. Communication supports may include, but are not limited to captioning, alternative and augmentative supports, plain language, sign language, reading out loud, captioning and/or using written notes to communicate.

Conversion Ready: an electronic or digital format that facilitates conversion into an accessible format.

Disability: A disability is a physical or mental condition that limits a person's movements, senses or activities. The AODA uses the same definition of disability as the Ontario Human Rights Code.

Diversity: refers to the presence of a wide range of human qualities and attributes within an individual, a group or an organization. Such factors as diversity includes, age, sex, race,

ethnicity, physical and intellectual ability, religion, sexual orientation, educational background and expertise.

Documented Individual Accommodation Plan: a plan developed by an employer, in consultation with an employee with a disability that documents the accommodations that will be provided so the employee can do his/her job. These plans are living documents and are to be reviewed regularly.

HTML/XHTML (Hyper Text Markup Language): the markup language for web pages and provides the basic building blocks of web pages. XHTML is a set of XML specifications that extend the rather limited capabilities of HTML and make it more disciplined.

Individualized Workplace Emergency Response Information: refers to the information prepared by employers, in consultation with their employees who have disabilities, to help them prepare for emergencies such as fire, severe weather and power outages.

Information: includes data, facts and knowledge that exists in any format, including text, audio, digital or images and that convey meaning.

Ontarians with Disabilities Act (ODA), 2001: requires government ministries, municipalities and public sector organizations such as transportation organizations, hospitals and school boards to develop an annual accessibility plan aimed at identifying, removing and preventing barriers to accessibility in a number of areas, such as government buildings, publications and internet sites.

PDF (Portable Document Format): a file format, which enables a document to be used on many different computer platforms but always to maintain the same visual appearance and page layout. Originally developed by Adobe in the early 90's, PDF is now an ISO standard and is widely used throughout the publishing industry both as part of its process for producing printed products and for some types of electronic products. The specifications of PDF files may vary depending on their intended use; some forms of PDF (particularly those specifically aimed at printing applications) are far from ideal for use in the production of accessible editions.

(WCAG) Web Content Accessibility Guidelines 2.0 Level A and Level AA: refers to different conformance levels in WCAG 2.0. To meet conformance Level A all Level A success criteria need to be met; to meet conformance Level AA all Level A and AA success criteria need to be met.

More information in WCAG development and website accessibility can be found at <http://www.w3.org/WAI/intro/wcag>

Township of Killaloe, Hagarty and Richards

Request for Document in Alternate Format

The Township of Killaloe, Hagarty and Richards is committed to meeting the needs of all residents. If you require information in an alternate format, please complete this form or contact the Municipal Office at 613-757-2300.

Contact Information:

Name: _____

Address: _____

Telephone Number: _____ Alternate Number: _____

E-mail Address: _____

Preferred Method of Contact: ☐ Mail ☐ Phone ☐ E-mail

Document Information:

Document Name: _____

Section(s) Required: _____

Additional Document Information: _____

Alternate Format Request:

Large Print

Font Size: _____ Font Style: _____

Electronic

☐ Microsoft Word ☐ HTML ☐ Text ☐ PDF

Colour Contrast (please specify): _____

Other (please specify): _____

Please return completed form to:

Township of Killaloe, Hagarty and Richards – Administration Department
1 John Street, PO Box 39, Killaloe ON K0J 2A0
E-mail: info@khrtownship.ca / Fax: 613-757-3634

For Office Use Only:

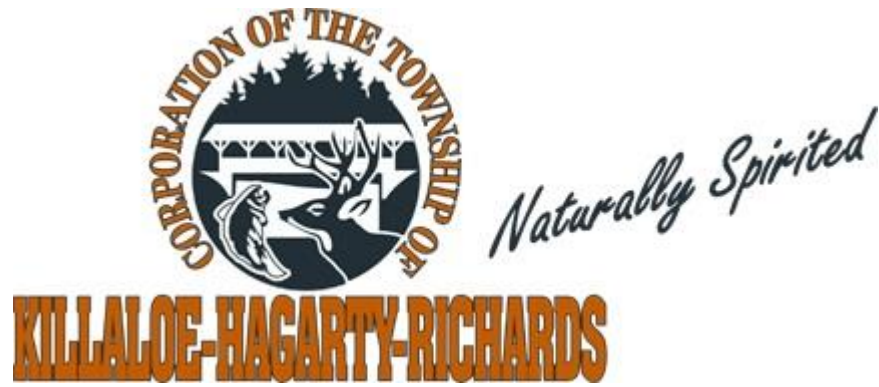
Date Received: _____ Received By: _____

Origin of Document: Administration Clerks Public Works Finance Fire Building By-Law/ Canine

Action Taken: _____

By Whom: _____ Date Completed: _____

NOTE: Personal information on this form is being collected under the authority of the *Freedom of Information and Protection to Privacy Act* R.S.O. c.F.31, s. 39 (2) for the purposes of improving customer service. Questions about collection of personal information may be directed by mail to the address above.



Accessibility Standards for Customer Service
Feedback/Suggestion Form

Name: _____

Telephone Number: _____

Address: _____

Email Address: _____

Department Involved: _____

Feedback/Suggestion: _____

Information will be collected and sent to the appropriate department. This department will find a suitable solution and contact you in a timely manner.

Thank you for your submission.

Municipal Freedom of Information and Protection of Privacy Act

Personal Information on this form is collected under the authority of Ontario Regulation 429/07, Accessibility for Customer Service. The information will be used to process this form, and will be kept on file to facilitate improvement to the Municipality's customer service policies, practices and procedures. Questions about this collection should be directed to the Township of Killaloe, Hagarty and Richards Municipal Office.



Please indicate the nature of the complaint (include as much detail as possible).

Please describe how you would like to see your complaint resolved.

Please attach any additional documents regarding you complaint (pictures, additional written content).

Please provide us with your contact information.

First Name: _____ Last Name: _____

Address Number & Street Name: _____

P.O. Box Number: _____ Town: _____ Postal Code: _____

Home Phone Number: _____ Cell Phone Number: _____

Email Address: _____

Please note that you will be contacted within ten (10) business days to confirm receipt of your complaint.

Please return your completed form:

Attention: CAO/Clerk – Treasurer

In-Person/Mail: Township of Killaloe, Hagarty and Richards, 1 John Street, Killaloe ON K0J 2A0

Telephone: 613-757-2300

Fax: 613-757-3634

Email: tgorgerat@khrtownship.ca

For Office Use Only

Date complaint form was received: _____

Received by:

Date complainant was contacted to confirm receipt of their complaint:

Complaint forwarded to (staff name):

Date forwarded: _____

Decision on complaint:

Date letter to complainant regarding decision of complaint sent:

NOTE: Personal Information on this form is being collected under the authority of the *Freedom of Information and Protection to Privacy Act R.S.O. c.F.31, s. 39 (2)* for the purposes of improving customer service. Questions about collection of personal information may be directed by mail to the address above.

APPENDIX "B"

Staff Guidelines for Addressing Unreasonable Requests

1.0 Purpose:

Unreasonable Requests consume a disproportionate amount of staff time and resources and they may also be **discriminating, harassing** or **violent** in nature. This policy establishes a framework for handling such **Unreasonable Requests** and is intended to protect staff and volunteers representing the Township from **Discrimination, Harassment** and **Violence**. Additionally, this policy helps ensure the efficient use of staff time and resources while maintaining a high level of customer service and responsiveness to taxpayers.

2.0 Definitions:

"Cyberbullying" means the use of communication technologies to engage in deliberate, repeated or hostile behaviour intended to harm, embarrass or slander someone deliberately, including, but not limited to: social media outlets (e.g. Facebook, Instagram, Twitter, YouTube), personal blogs, web pages, discussion groups or online media/newspaper articles;

"Elected Official" means a Member of the Township of Killaloe, Hagarty and Richards Council;

"Discrimination" means an action or decision that treats a person or a group negatively for reasons such as their race, age or disability. The Ontario Human Rights Code sets out a legal definition of Discrimination and establishes the prohibited grounds;

"Frivolous" means a Request that is without merit or substance or is trivial;

"Harassment" means engaging in a course of Vexatious/unwanted comment or conduct that is known, or ought reasonably to be known, to be unwelcome and includes a Pattern of Inappropriate Conduct;

"Intimidation Techniques" means unwarranted conduct, including, but not limited to: Cyberbullying, Discrimination, Harassment, Violence, profanity, personal insults or communication that is deemed threatening;

"Pattern of Conduct" means a regular form of behaviour from a Complainant or similar or related Complainants that appear to have been submitted for their nuisance value or as a method for harassing staff;

"Request" means a complaint, question, expression of concern or dissatisfaction with respect to the Township's actions, by-laws, operations, policies, procedures, regulations or rules;

"Unreasonable Request" means a Request that is characterized by one or more of the following: Cyberbullying, Discriminating, Frivolous, Harassing, Intimidation Techniques, Pattern of Inappropriate Conduct, Vexatious or Violent;

"Vexatious" means a Request that is without merit and pursued in a manner that is malicious or intended to embarrass or harass the recipient and includes Intimidation Techniques;

"Violence" means:

- (a) The exercise of physical force by a person against an employee in a workplace, that causes physical injury to the employee;
- (b) An attempt to exercise physical force against an employee, in a workplace, that could cause physical injury to the employee; or
- (c) A statement or behaviour that it is reasonable for an employee to interpret as a threat to exercise physical force against the employee, in a workplace, that could cause physical injury to the employee.

3.0 Addressing an Unreasonable Request:

3.1 Staff Procedure

Staff shall provide any supporting materials (e.g. emails, letters and notes documenting a conversation or incident) and advise the CAO/Clerk - Treasurer of the steps that have been taken to resolve the issue, including:

- The length of time that staff have been in contact with the requester;
- The amount of time spent in addressing the **Request**;
- The amount of correspondence that has been exchanged with the requester;
- The number of **Requests** that the requester has made on the same matter or substantially similar facts and the status of each; and,
- A description of the nature of the requester's behaviour and/or demeanour.

3.2 CAO/Clerk - Treasurer Procedure

The CAO/Clerk - Treasurer is responsible for investigating any Unreasonable Request brought forward. The CAO/Clerk - Treasurer will contact the Department Heads to determine if the requestor has contacted multiple departments with respect to the same or similar issue. If, after reviewing the circumstances, the CAO/Clerk - Treasurer determines that action should be initiated in accordance with these Procedures, the CAO/Clerk - Treasurer will advise the Mayor and all members of Council that a warning letter is to be issued to the requestor specifying the actions and behaviour that have led to issuance of the warning letter.

3.2.1 Warning Letter

The Warning Letter may include the following restrictions, but is not limited to:

- Requesting that the requestor's correspondence with staff to be a particular format (e.g. email only), time (e.g. telephone calls only at specific times and days of the week) or duration (e.g. conversations may not be longer than 10 minutes);
- Restricting the requestor to a particular point of contact at the Township and other staff will be advised to refer the requester to that point of contact;
- Attempting to ensure that any face-to-face interaction between the requestor and staff take place in the presence of an appropriate witness;

- Requiring that the requestor produce full disclosure of documentation or information before staff will further investigate a **Request** and waiting for that documentation or information to be reviewed and an investigation to be concluded before contacting staff;
- Instructing staff not to respond to further written correspondence from the requester regarding the **Request** or a substantially similar issue;
- Instructing staff not to investigate or respond to (other than to notify the requestor) any **Requests** regarding an issue that has already been investigated, or which is substantially similar to an issue that has already been investigated; and/or,
- In extreme circumstances, instructing staff to severely reduce or completely cease responses to further **Requests** and correspondence from the requester, as directed.

3.2.2 Procedure if Unreasonable Request Continue

If a requestor disregards the warning letter and continues to submit **Unreasonable Requests**, the actions outlined in the warning letter will take effect immediately.

3.3 Procedure for New Requests

The CAO/Clerk - Treasurer will decide if any restrictions which are currently in effect, should be applied to the new **Request(s)**.

3.4 Procedure for Handling Requestor Information

Staff are required to comply with the provision as outlined in *the Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA). For the purposes of resolving the **Request** and initiating action as outlined in these procedures, requestor information may be shared between departments. The information shared between departments will remain confidential, in accordance with MFIPPA.

3.5 Records

Staff are responsible for documenting interactions and maintaining records with persons making **Unreasonable Requests**. Records must be retained in accordance with the Records Retention By-law.

4.0 Addressing and Documenting a Pattern of Conduct of Unreasonable Requests:

In order for the CAO/Clerk - Treasurer to determine that a **Pattern of Conduct** exists, the **Requests** should meet one or more of the following requirements. A **Pattern of Conduct** must be established through documented evidence.

1. Is the **Request** excessively broad, varied in scope or unusually detailed?
2. Is the **Request** identical or similar to previous ones?
3. Is there evidence that the **Request** is intended to generate a result other than resolution?
4. Is there evidence of dishonesty, underhandedness or "bad faith" from the **Complainant**?
5. Is there documentation of an inordinate length of staff time spent addressing the **Requests**?

There are no fixed number of actions required to establish a **Pattern of Conduct of Unreasonable Requests**. Whether such a **Pattern of Conduct** exists will depend in part on the nature of the Requests.

For example, if it is determined that a person is repeating a **Request** that has earlier been processed and decided upon, a small number of **Requests** may establish a **Pattern of Conduct**. On the other hand, if it is determined that a person has repeatedly made different **Requests** that in combination unreasonably interfere with the Township's operations, a higher number of **Requests** may be required to establish a **Pattern of Conduct**.