

# Policies & Procedures

## Alternate Formats Policy



Effective: October 25, 2021

Approved by Council: October 25, 2021

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### 1. Statement of Organizational Commitment

The Township of Scugog (the “Township”) is committed to providing information and communication about their goods, services, or facilities in a manner that is accessible to persons with disabilities.

It is the policy of the Township of Scugog to provide fair and equal treatment to all individuals, to be respectful of their needs and differences, and to support accessibility and diversity.

### 2. Purpose

The purpose of this policy is to document how the Township of Scugog’s will, upon request, provide or arrange for the provision of accessible formats and communication supports for an employee or the member of the general public with a disability as per the requirements of the Integrated Accessibility Standards (I.A.S.R.) Ontario regulation 191/11 under the Accessibility for Ontarians with Disabilities Act (A.O.D.A.).

The Township of Scugog recognizes and will comply with all legislative requirements with regards to alternate formats and communication supports. This policy is also supported by the Township’s 2018-2022 Accessibility Plan and the Ontario Human Rights Code to ensure that people with disabilities have the right to equal treatment and equal access to services.

### 3. Scope and Responsibility

This policy applies to all Township of Scugog employees and customers of the Township, including persons with disabilities.

This policy applies to all materials and communications produced by the Township of Scugog for release to the public or staff whether produced in-house or on behalf of the Township. The Alternate Formats policy does not apply to unconvertible information and information that the Township does not control directly or indirectly through a contractual relationship.

The Director of Corporate Services/Clerk or designate is responsible for the overall implementation, administration, and enforcement of this policy.

#### 4. Definitions

**“Accessible/Alternate formats”** these may include, but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats used by persons with disabilities.

**“Accommodation”** means the arrangement made or assistance provided so that persons with disabilities can participate in the experiences available. Accommodation will vary depending on the person’s unique needs and the capacity of the Township to provide the requested accommodation.

**“Assistive devices”** means auxiliary aids that provide support and/or assistance to persons with disabilities which include, but are not limited to, wheelchairs, canes, scooters, crutches, walkers, personal sound amplification devices, ventilators etc.).

**“Barrier”** means obstacles that make it difficult, sometimes impossible, for persons with disabilities to do things in daily living (e.g., open doors, enter buildings, read small print, or walk far distances). Barriers can be visible or non-visible, such as attitudinal barriers. which includes physical disabilities as well as vision, hearing, speech, developmental, learning, and mental health disabilities.

**“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 communications.

**“Communications”** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

**“Conversion Ready”** means an electronic or digital format (Word) that facilitates conversion into an accessible/alternative format (i.e. compatibility with screen-reading software).

**“Disability”** as defined by the *Ontario Human Rights Code* 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 co-ordination, 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*.

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

**“Internet Website”** means a collection of related web pages, images, videos, or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and are accessible to the public.

**“Public documents”** means documents produced by a Township department for the purpose of providing information to the public about goods, services, or facilities (e.g., web content, brochures, applications, reports, business plans).

**“Township”** means the Corporation of the Township of Scugog.

**“Unconvertible”** means to technically feasible to convert the information or communications; the technology to convert the information or communications is not readily available.

**“Undue Hardship,”** as defined by the Ontario Human Rights Code, means a negative consequence to the municipality, if the request is honoured; factors to be taken into consideration when assessing undue hardship include:

- Cost
- Outside sources of funding, if any
- Health and safety factors, such as when a proposed accommodation would unduly endanger the safety of the employee and/or others

Factors that cannot be used to justify undue hardship include business inconvenience, employee morale and customer preference.

## **5. Policy**

### **5.1 Development of Township Documents**

The Alternate Formats policy applies to all materials and communications produced by the Township of Scugog for release to the public or staff whether produced in-house or on behalf of the Township. The Alternate Formats policy does not apply to unconvertible information and information that the Township does not control directly or indirectly through a contractual relationship.

All Township of Scugog documents shall be created in an accessible format. Documents shall be created using Arial Font with body text no smaller than 12 point and using the "Township of Scugog-Guide to Accessible Documents." Where applicable, staff are to use the corporate document template (i.e. letters, reports, by-laws).

All municipal documents that the Township controls directly or indirectly shall feature the "Alternate Formats" clause: "Alternate formats are available upon request. Please contact [accessibility@scugog.ca](mailto:accessibility@scugog.ca) or 905-985-7346."

### **5.2 Requests for Alternate Formats**

An employee or member of the public shall make requests for Alternate Formats through the "Alternate Format request form" attached hereto as Appendix A.

The form will be submitted to the Director of Corporate Services/Clerk or designate who will then consult with the department/staff where the document originated from, as well as the individual making the request to determine their accessibility needs.

The Director of Corporate Services/Clerk or designate shall consult with the person making the request to determine their accessibility needs. Further, the Director of Corporate Services/Clerk or designate shall work with the creator/department from which the document originated to determine an alternative format or communication support that meets the needs of the requestor.

Staff outsourcing creation of materials, communications and documents is responsible for ensuring that accessibility considerations for electronic, print and audio/visual material formatting are included in procurement specifications (e.g. video captioning, electronic document formatting of consultant reports, websites, etc.) as per the Township's Procurement By-law.

#### **5.2.1 Unconvertible Information**

If it is determined that information or communication are unconvertible, the Director of Corporate Services/Clerk or designate, shall provide the person requesting the information or communication with:

- I. an explanation as to why the information or communication is unconvertible (e.g. technology does not exist or the essence of the information will be lost); and,
- II. a written summary of the unconvertible information or communication.

### **5.2.2 Conversion of Alternate Formats**

Conversion to alternate formats shall be processed in-house wherever possible. If a request cannot be processed in-house, the municipality will explore external options for the conversion.

If it is determined that the format requested is not deemed feasible or is deemed to cause undue hardship, alternative methods of providing the information/communication shall be explored that will meet the needs of the person with a disability and be agreed upon by both parties, the individual and the Township of Scugog.

### **5.2.3 Meeting Requests in a Timely Manner**

The timeframe for completing the conversion of a document into an accessible format may vary depending on the format requested, the size, complexity, quality of source documents and the quantity to be converted.

Accessible formats shall be provided in a timely manner, depending on the factors named above and generally within two (2) weeks or less.

### **5.2.4 Providing Information at no Additional Cost**

The Township will Provide the format/communication support at a cost no more than the cost of methods of duplication or conversion similar in nature and in accordance with the Township of Scugog Fees and Charges By-Law.

## **5.3 Notification**

### **5.3.1 Public Notification**

The Township will take measures to notify the public about the availability of accessible formats and communication supports by posting notice on the premises and on the Township's website.

### **5.3.2 Employee Notification**

The Township will notify all employees of the availability of alternate formats and communication supports during annual staff training.



## Appendix A – Alternate Format & Communication Support Request Form

The Township of Scugog is committed to providing information in a format that meets your needs. If you require information in an alternate format or communication support, please complete this form.

### Requesters Information

To ensure the suitability of an accessible format provided, staff will consult with you for guidance on how we can best meet your needs.

Name:	
Mailing Address:	
Phone:	Email:

Please indicate your preferred method of contact:  Phone  Mail  Email

### Document/Website Content Information

Name of Document or Website URL:
Section(s) Required:
Additional Details:
What alternate format or communication support do you require?

**Please return your completed form to:**

Attention: Director of Corporate Services/Clerk

Mail or deliver form to:

Township of Scugog, 181 Perry Street, PO Box 780, Port Perry, ON, L9L 1B7

Fax to: 905-985-9914

Email to: [accessibility@scugog.ca](mailto:accessibility@scugog.ca)

Submit online to: [www.scugog.ca](http://www.scugog.ca)

**Thank you for your request.**

Staff will be in touch within two (2) business days to confirm receipt of your request and determine next steps.

<b>For Township Use Only:</b>	
Date Received:	Received by:
Follow up completed by:	Date follow-up completed:
Comments:	

**Note:** Personal information contained in this form is being collected under the authority of the Municipal Freedom of Information and Protection of Privacy Act, R.S.O. c.F.31, s. 39(2). Questions should be directed to the Clerk, Township of Scugog, 905-985-7346, extension 119.