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HR Guideline: AODA Integrated Accessibility Standards Regulation	Guideline #: 31
Effective Date: January 2014	Approved by:  Marisa Piattelli, CAO

Purpose

This policy is drafted in accordance with the Integrated Accessibility Standards (Ontario Regulation 191/11) and addresses how Waterfront Toronto achieves or will achieve accessibility by meeting the requirements of the regulation. The requirements will be met within the timeframes set in the Regulation.

The requirements of the regulation include:

- the establishment, implementation, maintenance and documentaton of a multi-year accessibility plan, which outlines Waterfront Toronto’s strategy to prevent and remove barriers and meet its requirements under this Regulation;
- the incorporation of accessibility features when designing, procuring or acquiring self-service kiosks;
- training;
- the specific requirements under the Information and Communication Standards, the Employment Standards and the Design of Public Spaces Standards.

This policy is supported by procedures/departmental policies that outline the detailed processes and accommodations pursuant to this policy.

Definitions

- a) **Accessible formats** may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- b) **Accommodation** means the special arrangements made or assistance provided so that customers with disabilities can participate in the experiences available to customers without disabilities. Accommodation will vary depending on the customer’s unique needs.
- c) **Amenities** means items that provide conveniences or services for use by the public, examples of which include drinking fountains, benches and garbage receptacles.
- d) **Beach access routes** means routes that are constructed and are intended for pedestrian use by the public and that provide access from off-street parking facilities, recreational trails, exterior paths of travel and amenities to an area of a beach that is intended for recreational use by the public.

- e) **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.
- f) **Communications** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.
- g) **Conversion ready** means an electronic or digital format that facilitates conversion into an accessible format.
- h) **Curb ramp** means a ramp that is cut through a curb or that is built up to a curb.
- i) **Depressed curb** means a seamless gradual slope at transitions between sidewalks and walkways and highways, and is usually found at intersections.
- j) **Disability** is:
 - 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 a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
 - d. A mental disorder;
 - 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.
- k) **Environmental mitigation** means activities that are intended to reduce, mitigate, prevent or compensate for adverse effects of human activities or items, including paths, play spaces, trails and parking, upon fish, wildlife, plants, invertebrates, species at risk, ecological integrity or natural heritage values.
- l) **Environmental restoration** means activities that are intended to benefit fish, wildlife, plants, invertebrates, species at risk, ecological integrity or natural heritage values.
- m) **Information** includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that conveys meaning.
- n) **Maintenance** mean activities that are intended to keep existing public spaces and elements in existing public spaces in good working order or to restore the spaces or elements to their original condition, example of which include painting and minor repairs.
- o) **Recreational trails** means public pedestrian trails that are intended for recreational and leisure purposes.
- p) **Redeveloped** means planned significant alterations to the public spaces, but does not include maintenance activities, environment mitigation or environmental restoration.

- q) **Rest area** means, in respect of recreational trails and exterior paths of travel, a dedicated level area that is intended for public use to allow persons to stop or sit.
- r) **Volunteer** may include a person who voluntarily undertakes a task on behalf of Waterfront Toronto.

Statement of Organizational Accessibility Commitment

Waterfront Toronto values openness and inclusivity and is committed to the principles outlined in the *Accessibility for Ontarians with Disabilities Act, 2005* and to meeting the needs of people with disabilities, in a timely manner, through the implementation of the requirements of the Act.

Mandatory Requirements

General

(1) Accessibility Plans

- I. The multi-year Waterfront Toronto Accessibility Plan (“the plan”) outlines the strategy to prevent and remove barriers for five years between 2014 and 2018, and to meet its requirements under the regulation;
- II. The plan is posted on the Waterfront Toronto website, www.waterfronttoronto.ca, and will be provided in alternate formats upon request;
- III. The plan will be reviewed and updated at least once every five years.

(2) Self-Service Kiosks

- I. Waterfront Toronto will consider incorporating accessibility features when designing and/or procuring new self-service kiosks.

(3) Training

- I. Waterfront Toronto ensures that training is provided on the requirements of accessibility standards referred to within the Integrated Accessibility Standards (Ontario Regulation 191/11) and on the *Human Rights Code* as it pertains to persons with disabilities for,
 - a. All employees and volunteers;
 - b. All persons who participate in developing Waterfront Toronto’s policies; and
 - c. All other persons who provide goods, services or facilities on behalf of Waterfront Toronto.
- II. The training provided is appropriate to the duties of employees, volunteers and other persons.
- III. Training is provided as soon as practicable to employees, volunteers and other persons.
- IV. Where there are changes to the Integrated Standards Accessibility Policy, training will be provided with regard to those changes.

- V. Waterfront Toronto will maintain a record of the dates of when training is provided and the number of individuals to whom it was provided.

Information and Communication Standards

(4) Feedback

- I. Waterfront Toronto's Customer Feedback process is accessible to persons with disabilities and does provide or arrange for the provision of accessible formats and communication supports upon request.

(5) Accessible Formats and Communication Supports

- I. Waterfront Toronto will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities;
 - a. In a timely manner that takes into account the person's accessibility needs due to disability, and;
 - b. At a cost that is no more than the regular cost charged to other persons.
- II. Waterfront Toronto will consult with the person making the request in determining the suitability of an alternative format or communication support.

(6) Accessible websites and web content

- I. Waterfront Toronto will ensure that its websites are accessible to as many people as possible. When new internet, intranet websites and web content on those sites are developed they will conform with the WCAG 2.0 guidelines, in accordance with the Integrated Accessibility Standards Regulation.
 - a. All new internet websites and web content on those sites will comply to the WCAG 2.0 Level A by January 1, 2014.
 - b. As of January 1, 2021 all internet, intranet and web content will conform with the WCAG 2.0 Level AA, other than: success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded).
 - c. Websites and web content, including web-based applications, that Waterfront Toronto controls directly or through a contractual relationship that allows for modification of the product, are included in this timeline, where practicable,
 - d. In determining practicability, consideration will be given to the availability of commercial software, or tools, or both, and whether planned or initiated implementation timelines (before January 2012) will be significantly impacted.

Employment Standards (To be implemented within the timeframes set out in the Regulation)

(7) Recruitment

- I. Waterfront Toronto notifies its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

- II. During a recruitment process, applicants who are individually selected to participate in an assessment or selection process are notified that accommodations are available upon request in relation to the materials or processes used;
- III. If a selected applicant requests an accommodation, Waterfront Toronto consults with the applicant, having regard for the applicant's accessibility needs, on the provision of a suitable accommodation; and
- IV. When making an offer of employment, Waterfront Toronto will notify the successful applicant of its policies for accommodating employees with disabilities.

(8) *Informing employees of supports*

- I. Waterfront Toronto informs its employees of its policies used to support employees with disabilities, including, but not limited to, policies on job accommodation that take into account the employee's accessibility needs due to a disability.
 - a. New employees will be informed of applicable policies as soon as practicable after they begin their employment.
 - b. Where there are changes to existing policies on the provision of job accommodation, all employees will be provided updated information.

(9) *Accessible formats and communication supports for employees*

- I. When an employee requests it, Waterfront Toronto will 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 for the employee to perform the employee's job; and
 - b. Information that is generally available to employees in the workplace.
- II. Waterfront Toronto will consult with the employee making the request in determining the suitability of an accessible format or communication support.

(10) *Workplace emergency response information*

- I. Waterfront Toronto provides individual workplace emergency response information to employees who have a disability.
 - a. Where the disability is such that individual information is necessary; and
 - b. Where Waterfront Toronto is aware of the need for accommodation due to the employee's disability.
- II. If an employee with individualized workplace emergency response information requires assistance, and provides consent, Waterfront Toronto will ensure that the necessary information is shared.
- III. Individualized information is provided as soon as practicable after Waterfront Toronto becomes aware of the need for accommodation due to an employee's disability.

- IV. Waterfront Toronto will review the individualized workplace emergency response information,
 - a. When the employee moves to a different location;
 - b. When the employee's overall accommodation needs or plan are reviewed;
 - c. When Waterfront Toronto reviews its general emergency response policies.

(11) Documented individual accommodation plans

- I. Waterfront Toronto will develop a written process for the development of Individual Accommodation Plans for employees with disabilities.

(12) Return to work

- I. Waterfront Toronto has a documented return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

(13) Performance Management

- I. Where Waterfront Toronto uses performance management in respect of its employees, the accessibility needs of employees with disabilities, and individual accommodation plans are taken into account.

(14) Career Development and Advancement

- I. Where Waterfront Toronto uses career development and advancement in respect of its employees, the accessibility needs of employees with disabilities, and individual accommodation plans are taken into account.

(15) Redeployment

- I. Where Waterfront Toronto uses career development and advancement in respect of its employees, the accessibility needs of employees with disabilities, and individual accommodation plans are taken into account in redeployment.

Design of Public Spaces Standards

Waterfront Toronto also has responsibilities under the Design of Public Spaces Standard when building new or making significant changes to its existing public spaces on or after January 1, 2017.

Where Waterfront Toronto constructs or redevelops public areas in its premises the design criteria in the Design of Public Spaces Standard will be followed including:

(16) Exterior Paths of travel

- I. Waterfront Toronto provides and intends to maintain accessible paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose and not to provide a recreational experience.
- II. Waterfront Toronto meets all technical requirements for structures that are connected to, provided on, or provided along exterior paths of travel, including:
 - a. Ramps;

- b. Stairs;
- c. Curb ramps;
- d. Depressed curbs; and
- e. Rest areas.

(17) Obtaining Services

Service Counters

- I. Waterfront Toronto provides and intends to maintain at least one service counter that is accessible to people who use mobility aids such as wheelchairs.
 - a. The counter is low enough for someone sitting in a mobility aid;
 - b. The counter has sufficient clear space for the person's knees;
 - c. The service counter is clearly identified with sufficient signage.

Fixed Queuing Guides

- I. Waterfront Toronto provides and intends to maintain fixed queuing guides that are accessible to people who use mobility aids and have vision impairments:
 - a. The guides provide sufficient width to allow for the passage of mobility aids and mobility assistive devices;
 - b. The guides have sufficiently clear floor area to permit mobility aids to turn where queuing lines change direction;
 - c. The guides are cane detectable.

Waiting Areas

- I. Waterfront Toronto provides and intends to maintain waiting area seating that includes,
 - a. At least three percent of seating in waiting areas that have seating fixed to the floor that is accessible for someone using a mobility aid;
 - b. No fewer than one accessible seating space.

(18) Maintenance

- I. Waterfront Toronto's accessibility plan includes its preventative and emergency maintenance procedures for the accessible parts of its public spaces, including posting of regular maintenance schedules and letting people know about alternatives.
- II. Procedures for handling temporary disruptions in service when an accessible part of Waterfront Toronto's public spaces stops working is also part of the plan.
- III. Upon completion of the design and construction of public spaces, projects or responsibilities that are assumed by third parties are no longer under the care, responsibility, supervision, or ownership of Waterfront Toronto. Waterfront Toronto assumes no responsibility for the continued maintenance of, nor attainment of, accessibility standards for these projects.

