

Integrated Accessibility Standards Regulation Policy

Purpose

This policy is drafted in accordance with the Integrated Accessibility Standards (Ontario Regulation 191/11) and addresses how the City of Stratford achieves or will achieve accessibility through meeting of 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 documentation of a multi-year accessibility plan, which outlines the City of Stratford's strategy to prevent and remove barriers and meet its requirements under this Regulation;
- the incorporation of accessibility criteria and features when procuring or acquiring good, service or facilities;
- the incorporation of accessibility features when designing, procuring or acquiring self-service kiosks;
- training;
- the specific requirements under the Information and Communications Standard, the Employment Standards; and the Transportation Standards
- This policy is supported by procedures/departmental policies which 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 arrangement made or assistance provided so that customers and employees with disabilities can participate in the experiences available to customers and employees without disabilities. Accommodation will vary depending on unique needs;
- c) **Alternate formats** may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities;
- d) **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.

- e) **Communications** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received;
- f) **Conversion ready** means an electronic or digital format that facilitates conversion into an accessible format;
- g) **Employee** means anyone that is employed by The Corporation of the City of Stratford;
- h) **Information** includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.
- i) **Volunteer** includes a person who is recruited directly by the City of Stratford and voluntarily undertakes a task on behalf of the City of Stratford.

Statement of Organizational Commitment

The City of Stratford 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 City of Stratford Accessibility Plan (“the plan”) outlines the strategy to prevent and remove barriers, and to meet its requirements under the regulation;
- II. The plan is posted on the city website, and will be provided in alternate formats upon request;
- III. The plan will be reviewed and updated at least once every five years;
- IV. The plan has been created in consultation with City staff, the Accessibility Advisory Committee, and with public input; and
- V. An annual status report on the progress of measures taken to implement the strategy will be posted on the website and in alternate formats upon request.

(2) *Procuring or acquiring goods, services or facilities*

- I. Accessibility criteria and features are incorporated when procuring or acquiring goods, services or facilities, except where it is not practicable to do so; and
- II. Where it is not practicable to incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, The City of Stratford will provide, upon request, an explanation.

(3) *Self- Service Kiosks*

- I. Accessibility features are incorporated when designing, procuring or acquiring self-service kiosks.

(4) *Training*

- I. The City of Stratford 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 the City of Stratford's policies; and
 - c. All other persons who provide goods, services or facilities on behalf of the City of Stratford.
- II. The training provided is appropriate to the duties of employees and volunteers.
- III. Where there are changes to the Integrated Standards Accessibility Policy, training will be provided with regard to those changes
- IV. The City of Stratford will maintain a record of the dates of when training is provided and the number of individuals to whom it was provided.

Information and Communications Standard

(5) *Feedback*

- I. The City of Stratford'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.

- II. The public is notified regarding the availability of accessible formats and communication supports.

(6) Accessible Formats and Communication Supports

- I. The City of Stratford 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. The City of Stratford will consult with the person making the request in determining the suitability of an alternative format or communication support.
- III. The City of Stratford notifies the public about the availability of accessible formats and communication supports.

(7) Emergency procedures, plans or public safety information

- I. Where The City of Stratford prepares emergency procedures, plans or public safety information and makes that information available to the public, the information will be in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

(8) Accessible websites and web content

- I. The City of Stratford's new internet, intranet websites and web content on those sites conforms to the Web Content Accessibility Guidelines (WCAG) 2.0, as required under the Regulation.

Employment Standards

(9) Recruitment

- I. The City of Stratford notifies its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process;
- II. During the 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, The City of Stratford consults with the applicant, having regard for the applicants accessibility needs, on the provision of a suitable accommodation;
- IV. When making an offer of employment, the City of Stratford will notify the successful applicant of its policies for accommodating employees with disabilities.

(10) *Informing employees of supports*

- I. The City of Stratford informs its employees of its policies used to support its 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 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.

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

- I. Where an employee requests it, the City of Stratford 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. The City of Stratford will consult with the employee making the request in determining the suitability of an accessible format or communication support.

(12) *Workplace emergency response information*

- I. The City of Stratford 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 the City of Stratford 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, the City of Stratford

will provide the individualized information to the person designated by The City of Stratford to provide assistance to the employee.

- III. Individualized information is provided as soon as practicable after the City of Stratford becomes aware of the need for accommodation due to an employee's disability.
- IV. The City of Stratford 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 The City of Stratford reviews its general emergency response policies

(13) Documented individual accommodation plans

- I. The City of Stratford has a written process for the development of Individual Accommodation Plan for employees with disabilities.

(14) Return to work

- I. The City of Stratford 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.

(15) Performance Management

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

(16) Career Development and Advancement

- I. Where the City of Stratford 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.

(17) Redeployment

- I. Where the City of Stratford uses redeployment in respect of its employees, the accessibility needs of employees with disabilities, and individual accommodation plans are taken into account.

Transportation Standards

(18) Conventional and Specialized Transportation Service Providers, General

- I. The City of Stratford provides the required information on their website and using other methods as applicable. Upon request the information is provided in an accessible format.
- II. If the accessibility equipment on a vehicle is not functioning and equivalent service cannot be provided, the City of Stratford will take reasonable steps to accommodate persons with disabilities who would otherwise use the equipment and the transportation service provider shall repair the equipment as soon as is practicable.
- III. The City of Stratford will provide employees and volunteers accessibility training. The accessibility training shall include training on, the safe use of accessibility equipment and features; acceptable modifications to procedures in situations where temporary barriers exist or accessibility equipment on a vehicle fails; and emergency preparedness and response procedures that provide for the safety of persons with disabilities.
- IV. The City of Stratford will establish, implement, maintain and document emergency preparedness and response policies that provide for the safety of persons with disabilities and shall make those policies available to the public and provide the policies upon request in an accessible format.
- V. The City of Stratford will, according to the legislated schedule, ensure that a support person will not be charged a fare, where the support person is accompanying a person with a disability and the person with a disability has need of a support person. It is understood that it is the responsibility of the person with a disability to demonstrate that need.
- VI. If the City of Stratford modifies a portion of a vehicle to which subsection (1) applies in a way that affects or could affect accessibility on or after July 1, 2011, the city will ensure that the modified portion meets the requirements of this Part.

(19) Conventional and Specialized Transportation Service Providers, Accessibility Plans

- I. The City of Stratford has a process for managing, evaluating and taking action on customer feedback. Customer feedback is received and reviewed by Manager. Appropriate action will then be taken by the Manager as Budget and other resources permit. Such action will then be relayed back to the customer.

- II. The City of Stratford has, in their accessibility plan, the development of a process for estimating the demand for specialized transportation services and to develop steps to reduce wait times
- III. The City of Stratford has a process for dealing with equipment failures. The driver is to notify garage staff and a spare bus is brought to the location. Passengers are then transferred to working vehicle.

(20) Conventional Transportation Service Providers, General

- I. The City of Stratford transit operators shall assist customers by deploying lifting devices, ramps or portable bridge plates upon request of a person with a disability; ensuring adequate time is provided to person with disability to safely board, be secured and de-board and that assistance is provided upon request for these activities. Transit operators will also assist with safe and careful storage of mobility aids or assistive devices. Upon request the Transit Division staff will make available in an accessible format the steps used by the Transit Operator.
- II. The City of Stratford will not charge a higher fare to a person with a disability than the fare that is charged to a person without a disability where the person with a disability uses conventional transportation services.
- III. In the event the official stop is deemed unsafe or not accessible by the operator, the operator will ensure that the vehicle is stopped at the closest, safest and most accessible location for the passenger and the operator shall always give consideration to the preference of the passenger with a disability.
- IV. In the event that a transit stop is temporarily inaccessible (i.e. blocked by snow or debris), the operator shall report such barrier to the garage staff. Staff will then drive to the location and remove the barrier.
- V. Where possible, transit operators shall ensure that all mobility aids and mobility assistive devices are safely stored within reach of the passenger.
- VI. The City of Stratford provides priority seating according to the requirements of the legislation. The courtesy seating for persons with disabilities is located as close as practicable to the entrance door of the vehicle. The courtesy seating for persons with disabilities is signed to indicate that passengers, other than persons with disabilities, must vacate the courtesy seating if its use is required by a person with a disability.
- VII. In the event that a scheduled route is changed and this change is known before the commencement of the trip, the transit operator will advise any passengers with disabilities on the bus and make alternate accessible arrangements to get the passenger to their destination. Alternate arrangements can include taking an

alternate route or transferring the passenger to a Parallel Transit bus, depending on their disability.

- VIII. When required, the City of Stratford will ensure that there are a pre-boarding verbal announcement of the route, direction, destination or next major stop. There are electronic pre-boarding announcements of the route, direction, destination or next major stop on its buses.
- IX. The City of Stratford will ensure that there are verbal announcements of all destination points or stops on its busses while the vehicle is on route or while the vehicle is being operated. Announcements are announced through electronic means; and are legibly and visually displayed through electronic means.
- X. The City of Stratford will ensure that all of its transportation vehicles that are manufactured on or after January 1, 2013 are equipped with grab bars, handholds, handrails or stanchions that are provided where appropriate at,
 - (a) locations where passengers are required to pay fares;
 - (b) each mobility aid securement position;
 - (c) each courtesy seating area intended for use by persons with disabilities;
 - (d) each side of any entrance or exit used by persons with disabilities.
- XI. The City of Stratford will ensure that grab bars, handholds, handrails or stanchions located at an entrance or exit used by a person with a disability are accessible from ground level and are mounted so that they are inside the vehicle when the doors are closed.
- XII. The City of Stratford will ensure that all vehicles to which this regulation applies meet the following standards:
 - a. The location of grab bars, handholds, handrails or stanchions must be distributed, as appropriate to the vehicle's design, throughout the vehicle to support independent and safe boarding, on-board circulation, seating and standing assistance and deboarding for persons with disabilities.
 - b. Grab bars, handholds, handrails or stanchions must not interfere with the turning and manoeuvring space required for mobility aids to reach the allocated space from the entrance.
 - c. Grab bars, handholds, handrails or stanchions must be high colour-contrasted with their background to assist with visual recognition.
 - d. Every grab bar, handhold, handrail or stanchion must, be sturdy, rounded and free of any sharp or abrasive element, have an exterior diameter that permits easy grasping by the full range of passengers and sufficient clearance from the surface to which it is attached, be designed to prevent catching or snagging of clothes or personal items, and have a slip resistant surface.
 - e. Where grab bars, handholds, handrails or stanchions return to a wall or floor, they must do so in a smooth curve. Brackets, clamps, screw heads or other fasteners used on grab bars, handholds, handrails or stanchions must be rounded or flush with the surface and free from burrs or rough edges.

- XIII. The City of Stratford will ensure that all of its transportation vehicles manufactured on or after January 1, 2013 have two or more allocated mobility aid spaces, with each space being a minimum of, 1220 millimetres by 685 millimetres for vehicles designed to have a seating capacity of 24 passengers or less, and 1220 millimetres by 760 millimetres for vehicles designed to have a seating capacity of more than 24 passengers; and are equipped, as appropriate, with securement devices.
- a. Spaces on transportation vehicles that are allocated as mobility aid spaces may be used for other passenger purposes, if not required for use by a person with a disability who uses a mobility aid.
- XIV. Every conventional transportation service provider shall ensure that all of its transportation vehicles manufactured on or after January 1, 2013 to which this section applies, are equipped with accessible stop-requests and emergency response controls that are located throughout the transportation vehicle, including places within reach of allocated mobility aid spaces and courtesy seating locations.
- a. Accessible stop-requests and emergency response controls must meet the requirements of the regulation.
- XV. The City of Stratford will ensure that all of its transportation vehicles manufactured on or after January 1, 2013 to which this section applies are equipped with lights above or beside each passenger access door that are constantly lit when the door is open and that illuminate the lifting device, ramp, portable bridge plate or step nosings, as the case may be. The lighting specifications will meet the requirements of the regulation.
- XVI. The City of Stratford will ensure that all of its transportation vehicles manufactured on or after January 1, 2013 to which this section applies display the route or direction of the transportation vehicle or its destination or next major stop according to the requirements of the regulation.
- XVII. The City of Stratford will ensure that all of its transportation vehicles manufactured on or after January 1, 2013 to which this section applies are equipped with lifting devices, ramps or portable bridge plates and that each of them meets the requirements of the regulation.
- XVIII. The City of Stratford will ensure that where transportation vehicles are equipped with steps, the steps meet the requirements in the regulation.
- XIX. The City of Stratford will ensure that where its transportation vehicles have a ramp, lifting device or a kneeling function, each of them is equipped with a visual warning lamp indicator mounted on the exterior near the mobility aid accessible door and with an audible warning alarm according to the requirements of the regulation.

(21) Specialized Transportation Service Providers

- I. The City of Stratford will have three categories of eligibility to qualify for specialized transportation services,
 - (a) unconditional eligibility;
 - (b) temporary eligibility; and
 - (c) conditional eligibility.

- II. For purposes of eligibility for specialized transportation services, Stratford will categorize persons with disabilities as follows:
 1. A person with a disability that prevents them from using conventional transportation services shall be categorized as having unconditional eligibility.
 2. A person with a temporary disability that prevents them from using conventional transportation services shall be categorized as having temporary eligibility.
 3. A person with a disability where environmental or physical barriers limit their ability to consistently use conventional transportation services shall be categorized as having conditional eligibility.

- III. The City of Stratford may deny requests for specialized transportation services to persons who are categorized as having temporary eligibility or conditional eligibility if the conventional transportation service is accessible to the person and the person has the ability to use it.

- IV. The City of Stratford will establish an independent appeal process to review decisions respecting eligibility and shall make a decision within 30 calendar days after receiving completed application.

Review Process

 - Passenger appeal is received in writing by the Manager of Cemetery/Transit
 - Written appeal is reviewed by Manager of Cemetery/Transit and the Director of Community Services
 - A written response is then provided to the passenger within 30 calendar days of receipt of the appeal

- V. The City of Stratford will develop procedures respecting the provision of temporary specialized transportation services earlier than in the 14 calendar days according to the requirements of the regulation.

- VI. The City of Stratford will ensure fare parity and the same fare payment options are available for people with disabilities. Where applicable alternative options shall be made available to persons with disabilities who cannot because of their disability use a fare payment option.

- VII. The City of Stratford will make specialized transportation services available to eligible visitors and shall consider as eligible:
- Visitor to show card that says they are eligible for specialized transportation services in the jurisdiction in which they reside; or
 - Visitors who meet the eligibility criteria for Stratford's Parallel Transit service.
- VIII. The City of Stratford will provide origin to destination services within its service area that takes into account the abilities of its passengers and that accommodates their abilities.
- IX. The City of Stratford will ensure that the specialized transportation services has, at a minimum, the same hours and days of service as the conventional transportation services.
- X. The City of Stratford, where it takes reservations for specialized transit, will provide same day service to the extent that it is available; and where same day service is not available, accept booking requests up to three hours before the published end of the service period on the day before the intended day of travel.
- XI. The City of Stratford will not limit the availability of specialized transportation services to persons with disabilities by, restricting the number of trips a person with a disability is able to request; or implementing any policy or operational practice that unreasonably limits the availability of specialized transportation services.
- XII. The City of Stratford will provide information on the duration of service delays to affected passengers by a method agreed to by the specialized transportation service provider and passenger. A service delay is a delay of 30 minutes or more after the scheduled pick-up time. This does not apply in respect of delays in service that arise during the trip.
- XIII. The City of Stratford will provide information on duration of service delays to affected passengers by a method agreed upon by Stratford provider and passenger. A service delay is a delay of more than 30 minutes or more after the scheduled pick-up time. In the event of a service delay, the dispatcher will contact the passenger to make alternate arrangements
- XIV. The City of Stratford allows companions to travel with persons with disabilities if space is available and will not result in the denial of service to other persons with disabilities. Further, the city allows dependants to travel with a person with a disability who is the parent or guardian of the dependant if appropriate child restraint securement systems and equipment are, if required, available.

(22) Duties of Municipalities and Taxicabs

- I. The Stratford Police Services Board will ensure that licensed owners and operators of taxicabs do not charge a higher fare or additional fees to a passenger with a disability.

The Board will also consult with the public to determine the proportion of accessible taxi cabs required in the community.