

Category: Accessibility and Inclusion

Title: Accessibility Policy

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1. Background

The City of Brampton (the City) is committed to ensuring individuals of all ages and abilities have equitable access to participate in all aspects of the community. The City values diversity, inclusiveness, and the unique contribution that each resident makes to the local community.

The City recognizes that preventing new barriers, reducing and removing existing barriers, and enhancing access to our goods, services, and facilities is essential to providing increased opportunities that foster independence, inclusion, and dignity for people of all ages and abilities.

The *Accessibility for Ontarians with Disabilities Act (AODA) S.O. 2005, c. 11*, was established in 2005 to develop, implement and enforce accessibility standards. In 2011, the *Integrated Accessibility Standards Regulation (IASR) Ontario Regulation 191/11*, was introduced to set out requirements to ensure compliance with specific obligations, standards, timelines and targets.

The IASR consists of general requirements as well specific requirements under the following standards:

- Information and Communications;
- Employment;
- Transportation;
- Design of Public Spaces; and,
- Customer Service.

The Accessibility Policy affirms the City of Brampton's commitment to comply with the:

- Accessibility for Ontarians with Disabilities Act (AODA);
- Integrated Accessibility Standards Regulation (IASR);
- Ontario Human Rights Code;
- Ontario Building Code;
- City of Brampton Technical Accessibility Standards; and,
- City of Brampton By-laws.

2. Purpose

The City's mission is to be a vibrant, safe and attractive city of opportunity where efficient services make it possible for families, individuals and the business community to grow, prosper and enjoy a high quality of life.

The City of Brampton and its Accessibility Advisory Committee are committed to ensuring people of all ages and abilities enjoy the same opportunities as they live, work, play, visit and invest in our city. The Policy will ensure the City:

- Comply with the Accessibility for Ontarians with Disabilities Act (AODA) and the Integrated Accessibility Standards Regulation (IASR) requirement to develop, implement and maintain accessibility policies and make such documents available to the public, and in an alternate format upon request;
- Provide overarching framework to act as a foundation to develop, enforce and implement other accessibility policies, Standard Operating Procedures (SOPs), City By-laws, reference material and guidelines;
- Identify, remove and reduce accessibility barriers including physical, architectural, informational, communicational, technological, organizational, attitudinal and systemic barriers; and,
- Provides opportunities for individuals of all abilities to have equitable access to City information, facilities, services, programs, employment and volunteer opportunities.

3. Application and Scope

This Policy applies to:

- Members of Council and their staff;
- City employees, volunteers, agents, students, contractors and third parties acting on behalf of the City for the provision of goods, services, programs and facilities; and,
- The Accessibility Advisory Committee.

4. Principles

- **Dignity:** All individuals, be it, employees, volunteers, residents or business owners are valued and deserving of full and effective service, where individuals facing barriers are not treated differently or forced to accept lesser opportunities, service, quality or convenience;
- **Independence:** Freedom from control or influence of others;
- **Integration:** All employees, residents, and visitors fully benefit from the same opportunities and services, in the same place, and in the same or similar ways as others; and
- **Equitable Opportunities:** Having the same chances, options, benefits and results for individuals of all abilities. People with disabilities should not have to make significantly more effort to access information or obtain services and should receive the same quality service as others.

5. Outcomes

5.1 Compliance with Legislation and Regulations

The City has one or more policies governing how the organization will achieve the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA)* and *Integrated Accessibility Standards Regulation (IASR)* to

enhance accessibility in the community. Where the documents are not published in an accessible format, the City will make these documents available to the public, and in alternate formats upon request.

Establish, implement and maintain an accessibility policy and Multi-year Municipal Accessibility Plan (MAP) that outline the City plans to create an inclusive and accessible environment.

Provide, create and receive information and communications in an accessible format.

Provide an inclusive and accessible service for all employees, residents, and visitors.

Establish processes to determine employee accommodation needs for new and existing employees.

6. Mandatory Requirements

6.1 General Requirements

a. Establishment of Accessibility Policies

The City will establish, implement, and maintain accessibility policies to meet the AODA and IASR requirements.

b. Multi-year Municipal Accessibility Plan

The will establish, implement, maintain and document a multi-year Municipal Accessibility Plan (MAP) that outlines its strategy for identifying, removing, and preventing barriers. The MAP shall be reviewed in consultation with the AAC at least once every five years or as updates are required and are posted on the public website.

The City must prepare an annual status report on the progress of the MAP, post the report on the website and provide both the MAP and annual report in an alternate format, upon request.

c. Procuring or acquiring goods, services, facilities

When procuring or acquiring goods, services, self-service kiosks, or facilities, the City will incorporate accessibility design, criteria, and features, unless it is not practicable to do so. If not practicable, the City must provide an explanation, upon request.

d. Training

The City will ensure that training is provided to all existing and new employees, volunteers, those developing City policies/directives, and others who provide goods or services on behalf of the City. The training shall be appropriate to the duties of the employees, volunteers, and other persons.

The City will keep a record of the training provided, including the dates and the number of employees who received the training.

Additional information regarding training is available in the **Accessibility – Customer Service Statement of Procedure**.

6.2 Information and Communication Requirements

The City will create, provide and receive information and communications in ways that are accessible for individuals of all abilities.

The standard addresses four aspects of information and communication:

- **Alternate Formats & Communication Supports:** Provide alternate formats when requested: large print, text transcript, handwritten notes, electronic document, etc.
- **Feedback Process:** Receiving, investigating, action and resolution.
- **Emergency Procedures & Public Safety Information:** Must be provided in Alternate Formats when requested; and,
- **Accessible Websites and Web Content:** Must conform to the Web Content Accessibility Guidelines (WCAG) 2.0 developed by the World Wide Web Consortium (W3C). All websites and web content must also adhere to the timelines outlined in the IASR.

6.3 Customer Service Requirements

The City will strive for excellence in serving all customers regardless of ability, and must meet obligations under the Ontario Human Rights Code, AODA, and the IASR.

The Customer Service Standard sets out requirements to achieve inclusive customer service while understanding that customers may have different needs. This may include but is not limited to the use of service animals, support persons, assistive devices, and technology. The Customer Service Standard requires a process for Notice of Disruption and states that individuals with disabilities should not be subject to higher fees or fares when accessing City services and programs.

This standard also requires staff to be trained on:

- How to interact and communicate with individuals with disabilities

- How to interact with individuals who use an assistive device and those who require the assistance of a service animal or support person.
- How to use equipment, devices, or technology available or provided in City facilities or on City websites.
- What to do if an individual is having difficulty accessing the City related information, services, programs or facilities.

6.4 Employment Standards Requirements

The Employment Standard applies to all employees and requires employers to establish processes to determine employee accommodation needs for new and existing employees.

The Employment Standard builds upon the duty to accommodate and meets the needs of employees with disabilities as required in the Ontario Human Rights Code.

The City will create policies for recruitment, alternate formats/supports for employees, workplace emergency response information, accommodation plans, return to work process, performance management, career development, and redeployment.

6.5 Transportation Standards Requirements

The Transportation Standard sets out requirements that will prevent and remove barriers to make it easier for people to travel in Ontario. The standard applies to transportation providers like Brampton Transit, ZUM, rail transportation services, commuter trains, specialized transit such as Trans Help. Transportation and shuttle services provided by school boards, hospitals, colleges, and universities are also covered under this standard. It also sets out regulations for the licensing of taxicabs.

Brampton Transit will maintain policies on Priority Seating, Non-functioning accessibility equipment, Stop Annunciation, and assisting individuals with disabilities.

6.6 Design of Public Spaces Requirements

The Design of Public Spaces Standard applies to newly constructed and significantly redeveloped public spaces, components, and amenities. Examples include but are not limited to paths of travel, ramps, recreational trails, outdoor play areas, accessible parking, etc. The standard also sets out requirements for service counters, waiting areas, the maintenance of accessible elements, and opportunity for public consultation through the Accessibility Advisory Committee.

The standard does not require existing public spaces or facilities to be retrofitted however, the expectation is that the new requirements will be implemented to the greatest extent possible when replacing, renovating, or retrofitting existing City facilities and public spaces.

The City will apply the City's Accessibility Technical Standards or the Design of Public Spaces Standards, whichever provides the highest level of accessibility.

7. Roles and Responsibilities

Accessibility is a shared responsibility, and everyone has a part to play in making the City accessible to residents, visitors, and co-workers, as described in the following roles and responsibilities.

All People Leaders, Managers, and Department Heads

- Ensure resources are budgeted for identifying and preventing accessibility barriers, including attitudinal, systemic, information, communications and technology, and built environment and public space barriers, and for planning for barrier removal;
- Provide oversight for implementation of this Policy and compliance with AODA within area of responsibility;
- Provide AODA compliance assurance when required;
- Provide leadership in building an inclusive and accessible environment for the public and employees;
- Facilitate requests for accommodation by members of the public and employees with disabilities in a timely manner, to the point of undue hardship, in accordance with the Ontario Human Rights Code and the City's policy, practices and procedures;
- Prevent barriers by including accessibility considerations in the development of new policies, practices, procedures or bylaws;
- Ensure that the Policy is communicated to all City employees and those acting on behalf of the City;
- Promote awareness of the Policy within their area of responsibility;
- Monitor current practices and ensure that management and staff are held accountable for their responsibilities under the Policy;
- Act on non-compliant issues within their area of responsibility;
- Attend training and ensure staff receive training appropriate to the duties of their role, including any skills and competencies required to identify, prevent and remove accessibility barriers;
- Ensure volunteers and other third parties providing goods, services, and facilities on behalf of the City have been provided training, either by the City or their organizations; and,
- Consult with the Accessibility team for assistance with accessibility issues.

Employees, Volunteers and Third Parties

- Maintain compliance with this Policy;
- Be familiar with their rights and responsibilities under this Policy;
- Participate in identifying accessibility barriers and planning for barrier prevention and/or removal;
- Provide a welcoming environment for people with disabilities, including any person with a disability using assistive devices or accompanied by a support person or service animal;
- Communicate with persons in a manner that considers their disability;
- Provide information and communications in alternate formats upon request, or with communication supports, consulting with the requestor about their preferred format;
- Facilitate the process of receiving and responding to feedback about the manner that the City provides goods, services, and facilities to persons with disabilities, and ensure all feedback processes are accessible to persons with disabilities by providing for alternate formats and communication supports upon request;
- Facilitate requests for accommodation by members of the public and employees with disabilities in a timely manner, to the point of undue hardship, in accordance with the Ontario Human Rights Code and the City's policy, practices and procedures;
- Request support from supervisors, managers, directors or division heads when accommodation requests are outside their area of responsibility, or beyond their capacity;
- Attend mandatory training and any additional training appropriate to the duties of their role; and,
- Ensure confidentiality and protection of personal information.

Brampton Accessibility Advisory Committee

- Provide advice to City Council on the requirements and implementation of AODA accessibility standards, preparation of accessibility reports, and other accessibility related matters for which Council may seek advice;
- Provide advice to City Council on the prevention and elimination of barriers faced by persons with disabilities to achieve accessibility with respect to City bylaws, policies, goods, services and programs, employment, facilities, buildings, structures and premises; and,
- Act as a liaison with external bodies on identifying, preventing, and removing barriers to the participation of persons with disabilities in public life.

8. Monitoring and Compliance

While all staff play a role in ensuring accessibility standards are met, the monitoring and compliance is the responsibility of the City's people leaders, specifically:

- Provide oversight for implementation of this Policy and compliance with AODA within areas of responsibility;
- Provide AODA compliance assurance when required; compliance reporting submitted by Accessibility Team;
- Monitor current practices and ensure that management and staff are held accountable for their responsibilities under the Policy;
- Ensure effective implementation of the Accessibility policy by developing department specific SOPs.
- Report on program activities and key performance metrics.

9. Consequences of non-compliance

Failure to follow this Council Policy may result in non-compliance and/or prosecution of a Provincial or Federal Offence.

The consequences of non-compliance may include reputational damage to the City, negative publicity, litigation and financial damages ranging from \$50,000 - \$100,000, per day, depending on the impact and contravention history of the person or organization, as per O. Reg. 191/11, s. 83 (1). City employees acting in good faith will not be subject to disciplinary action for non-compliance. Failure to adhere to the provisions of this policy will result in a review of the circumstances by Human Resources and Corporate Leadership, and if a failure is validated, will result in disciplinary action. The consequence of conviction of a Provincial or Federal Offence may include a fine.

10. Definitions

Term/ Acronym	Definition
Accessible	A product, device, information, technology, service, facility or public space that provides for independent, equitable and dignified access for people with disabilities, including but not limited to those with visual, auditory, sensory, cognitive, and mobility related disabilities.
Accessibility	Accessibility at the City of Brampton means ensuring individuals of all abilities have equitable access to all aspects of community life. This includes access to information, employment, services, programs, facilities, transportation, and opportunities for social engagement.

Accessibility Advisory Committee (AAC)	A City of Brampton Committee, advising Council on matters related to the City's accessibility plans and priorities.
Accessibility Team	A section under the City Clerk's Office that provides guidance and advice on accessibility matters, to ensure City facilities, technologies, programs, and services are accessible to all.
Alternate Format	Alternate formats refer to any non-traditional publishing formats such as large print, recorded audio of electronic formats, Braille, and other formats.
Accommodation	Preventing and removing barriers caused by attitudinal, systemic, physical, information or communications, and technology barriers that unfairly exclude individuals or groups protected by Ontario's Human Rights Code from having equal access to full benefits available to others.
AODA	The <i>Accessibility for Ontarians with Disabilities Act, 2005</i> , that became law on June 13, 2005, used to develop mandatory accessibility standards to identify, remove and prevent barriers for people with disabilities in key areas of daily living.
Assistive Devices	Assistive technology and devices are used to assist in carrying out activities or accessing services. People with disabilities have the right to use their assistive devices when they are accessing our goods, services and facilities. Examples include but are not limited to: wheelchairs, scooters, screen-reading devices, accessible computer software, hearing aids, etc.
Barrier	<p>A barrier is something that prevents a person from accessing services, facilities, and programs in the same way as others.</p> <p>Six of the most common types of barriers are:</p> <ul style="list-style-type: none"> • Physical or architectural • Informational or communicational • Technological • Organizational • Attitudinal

	<ul style="list-style-type: none"> • Systemic
Communication Supports	Includes but is not limited to captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.
Disability	Any impairment, including but not limited to a physical, mental, intellectual, cognitive, learning, communication or sensory impairment, or a functional limitation, whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.
IASR	Integrated Accessibility Standards Regulation, which is a grouping of 5 standards developed by the AODA, that have been designed to prevent and remove barriers for people with disabilities.
Kiosk	An interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.
MAP	Multi-year accessibility plan, as required by the AODA.
Service Animal	An animal used by a person with a disability for reasons relating to the person's disability; or an animal that the person provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to the person's disability.
Standard Operating Procedures (SOP)	Statement of Procedure specific to the City of Brampton that describes the activities necessary to complete tasks in accordance with legislation, regulations, City By-laws and City policies.
Support Person	An individual who accompanies a person with a disability to help with communication, mobility, personal care or medical needs or with access to goods, services, and programs.
Undue Hardship	A special or specified circumstance that would exempt the City from meeting obligations identified

	under the AODA and/or IASR so as to avoid an unreasonable or disproportionate burden or obstacle, including but not limited to exorbitant cost to taxpayers.
Web Content Accessibility Guidelines (WCAG) 2.0	Web Content Accessibility Guidelines (WCAG) are guidelines developed through the W3C process in collaboration with individuals, experts, and organizations worldwide. The goal is to provide digital accessibility standards so that all online content is accessible for all.
WC3	World Wide Web Consortium is an international community that develops open standards to ensure the long-term growth of the Web.

11. References and Resources

11.1 External references

- [Accessibility for Ontarians with Disabilities \(AODA\)](#)
- [Highway Traffic Act](#)
- [IASR Standards](#)
- [Ontario Building Code](#)
- [Ontario Human Rights Code](#)

11.2 References to Related Bylaws, Council Priorities, and Administrative Directives

- [Accessible Parking By-Law](#)
- [Noise By-Law](#)
- [Property Standards By-Law](#)
- [Sign By-Law](#)
- [Snow Clearing By-Law](#)
- [Protection of Personal Information Policy](#)

11.3 References to Corporate-Wide Procedures, Forms, and Resources

- [2019-2025 Municipal Accessibility Plan](#)
- City of Brampton Accessibility Technical Standards
- Accessibility – Customer Service Standard Operating Procedure
- Accessibility – Design of Public Spaces Standard Operating Procedure
- Accessibility – Employment Matters Standard Operating Procedure

- Accessibility – General Matters Standard Operating Procedure
- Accessibility – Information and Communication Standard Operating Procedure
- Accessibility – Transportation Standard Operating Procedure

Revision History

Date	Description
2021/07/07	Approved – Replaces Inclusive Customer Service Policy 14.12.1 Accessibility Policy (rescinded by Council Resolution No. CW348-2021)
2024/07/07	Next Scheduled Review
