



Toronto and Region
Conservation
Authority

Accessibility for Persons with Disabilities

Multi-Year Plan 2024 -2029



Table of Contents

Background	3
General Requirements	4
Training	6
Self-Service Kiosks	7
Accessible Emergency Information	8
Customer Service	9
Feedback	10
Information and Communication	11
Employment	13
Procurement	15
Design of Public Spaces	16
Review, Update and Report	17
Additional Information	18



Background

Toronto and Region Conservation Authority (TRCA) is committed to creating and providing inclusive programs, services and spaces to all members of our communities. To achieve this requires the identification and removal of barriers to participation, including social, cultural, economic and physical elements. A key component of this program of removing barriers to participation is the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

Enacted in 2005, the AODA will guide Ontario to become barrier-free by January 1, 2025, and was developed to assist organizations in the public, private and not-for-profit sectors in identifying barriers to accessibility. It includes standards in:

- Customer Service
- Information and Communication
- Employment
- Transportation
- Design of Public Spaces

All standards, except for Transportation, apply to TRCA.

The Ontario Regulation 191/11, Integrated Accessibility Standards, made under the AODA (IASR) and requires the development of a multi-year plan to prevent and remove barriers for persons with disabilities.

The TRCA Accessibility for Persons with Disabilities Policy ensures that TRCA meets its requirements within the AODA and its associated standards, including the IASR. The TRCA Accessibility for Persons with Disabilities Plan will guide TRCA towards improving opportunities for persons with disabilities and ensure that TRCA remains in compliance with AODA and the IASR standards.

TRCA is considered a large organization under the IASR given that it employs more than 50 employees. The TRCA Accessibility for Persons with Disabilities Plan 2024-2029 outlines the steps that TRCA has taken and will continue to focus on to improve opportunities for persons with disabilities, as required by the AODA.

General Requirements

The Accessibility for Ontarians with Disabilities Act, 2005 outlines requirements organizations must follow to ensure accessibility for people with disabilities. These requirements incorporate various areas, including customer service, information and communication, employment, transportation and design of public spaces. By complying with the applicable standards, TRCA aims to foster an inclusive environment that promotes equal access and participation for all individuals, regardless of their abilities.

The General Requirements contain guidelines on establishing and maintaining an accessibility plan to remove barriers for people with disabilities. This involves considering accessibility during procurement, employment and installation of self-service kiosks within TRCA. TRCA must also provide relevant training on accessibility standards and the Human Rights Code and ensure there are accessible feedback processes.

TRCA will ensure the following general requirements of the Integrated Accessibility Standards Regulation (IASR) under the AODA are met to support accessibility for persons with disabilities.

- Maintaining and updating our accessibility policy.
- Ensuring we have appropriate accessibility plans in place.
- Procuring or acquiring goods, services or facilities aligned with the IASR.
- Ensuring Self-Serve Kiosks are compliant with IASR.
- Continue to provide appropriate training to TRCA staff that complies with AODA requirements.

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Training

TRCA provides training to employees and regular volunteers on Ontario's accessibility laws and regulations and on the Human Rights Code as it relates to people with disabilities. Training is provided in a way that best suits the needs of community members and the duties of employees, volunteers and other employees. This may include a variety of formats such as presentations and e-learning modules.

TRCA ensures employees and regular volunteers are provided with the training needed to meet Ontario's accessibility laws and regulations, specifically:

- TRCA ensure that every person who participates in the development of the policy, practices and procedures under Ontario Regulation 191/11, Integrated Accessibility Standards (IASR), made under the AODA is trained appropriately in relation to TRCA's corresponding policies and procedures.
- TRCA ensure that every person who deals with the public on behalf of TRCA completes training in relation to TRCA's accessibility for persons with disabilities policies and procedures.
- New employees and regular volunteers receive training as soon as practicable, upon hire.

- Ongoing training on changes to policies, procedures, and new equipment is provided. The method and amount of training is geared to the trainee's level of responsibility in responding to the standards of the AODA.
- Training records, including the dates when the training was provided, and number of individuals to whom the training was provided is documented.
- TRCA apply an equity and accessibility analysis to all organizational learning and development activities.
- TRCA ensure all training, learning activities, course material and learning approaches are developed and delivered in accessible formats.
- Any learning and development curriculum that is developed internally or by a third party on behalf of TRCA meets accessibility requirements.

Self-Service Kiosks

The IASR defines kiosk as 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 [0. Reg. 191/11, s. 6 (5)].

TRCA has taken steps to ensure the needs of people with disabilities when designing, procuring or acquiring permanent and temporary self-service kiosks.

Additionally:

- TRCA ensure that every employee involved in the design, procurement or acquisition of self-service kiosks evaluates the technical and structural features of the kiosk in terms of the kiosk's accessibility for persons with disabilities.
- TRCA ensure that every employee involved in the location and installation of self-service kiosks considers the accessibility of the path to the kiosk for persons with disabilities.
- When accessible self-service kiosks are not possible, alternative methods for accessing one or more services or products or both are provided.



Accessible Emergency Information

The AODA requires that TRCA's emergency procedures, plans or public safety information that is available to the public, be made available in an accessible format or with appropriate communication supports as soon as possible upon request.

- TRCA is committed to providing our employees, customers and clients with available emergency information:
- TRCA provide updates to the public through the TRCA website, electronic mailing lists and at information kiosks at TRCA facilities.
- TRCA provide individualized emergency response information to employees with disabilities during onboarding.
- With the employee's consent, TRCA provides the emergency response information to the individual designated to assist the employee. The individualized emergency response information is reviewed at the employee's request.
- General emergency response policies and plans are reviewed and updated as required.
- All documents and information can be provided in an accessible format at no additional charge, upon request.

Customer Service

TRCA is committed to serving all its customers to the best of its ability. This means that persons with disabilities will receive goods and services with the same high quality and timeliness as others. To do so, TRCA provides customized solutions based on an understanding of the disability and/or barrier.

TRCA has adopted policies, practices and procedures to ensure that customer service is accessible to persons with disabilities.

TRCA is committed to ensuring:

- Goods and services are provided in a manner that respects the dignity and independence of persons with disabilities.
- The provision of goods or services to persons with disabilities and others is integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods or services.
- Persons with disabilities are given an opportunity equal to that given to others to obtain, use and benefit from the goods or services.
- Persons with disabilities may use assistive devices and/or support persons in the access of goods and services.
- TRCA employees communicate with a person with a disability in a manner that takes into account the person's disability.

Feedback

Feedback from our customers provides TRCA with opportunities to learn and improve. TRCA recognizes the right of our customers to leave feedback to help improve our services.

TRCA ensures that our feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request. To this end, TRCA takes the following steps at no additional cost:

- To assist TRCA in ensuring the delivery of goods and services to those with disabilities is provided in an effective and timely manner, the customer is invited to provide their feedback as follows in writing, in person, e-mail, or telephone, addressed to the designated representative for TRCA.
- The designated representative responds either in writing, in person, e-mail or telephone acknowledging receipt of feedback and will set out the action to be taken in response to any complaints.

- TRCA employees will continue to respond in a timely and respectful manner to feedback received on matters regarding accessibility for persons with disabilities.
- TRCA employees have access to the Whistleblower program which allows them to provide anonymous feedback about the organization and/or identify any concerns they have.
- The general public is able to provide feedback to TRCA through our external website feedback tool, and through various contacts listed on the external website.
- TRCA employees are encouraged to provide feedback TRCA through regular employee engagement surveys.



Information and Communication

TRCA is committed to meeting the information and communication needs of persons with disabilities. The information we provide and the way we communicate are key to delivering programs and services to the public. TRCA consults with people with disabilities to determine their information and communication needs.

TRCA's website and content on its pages conforms to Web Content Accessibility Guidelines (WCAG) 2.0, Level A. Guidelines for content development are coupled with training sessions for TRCA employees who manage web content.

TRCA takes the following steps to make sure all publicly available information is made accessible upon request:

- Notify the public about the availability of accessible formats and communication supports.
- Ensures that TRCA Communications, Marketing and Events employees receive detailed guidelines and training on how to make information available in accessible formats.

- Incorporates accessible features into communication mediums, such as Braille into way-finding signs and American Sign Language interpreters at public meetings when requested.
- Ensures the process for receiving and responding to feedback is accessible by providing or arranging for accessible formats and communication supports as requested.

TRCA is taking the following steps to make all websites and content conform to WCAG 2.0, Level AA.

- Update the guidelines and training for web content development to reflect the requirements of WCAG 2.0, Level AA when required.
- Ensure that all TRCA employees who manage web content receive training on the requirements of WCAG 2.0, Level AA.

Information and Communication

TRCA has also made two major changes since 2016 which will help us meet AODA standards:

- Moved trca.ca from a custom web application to WordPress in 2016 and have developed an AODA compliant website template. We are currently managing versions to ensure we are always on the latest build.
- Web content management has been changed from a distributed model to that of a centralized model, where Communications, Marketing and Events is the author and publisher of all content. Communications, Marketing and Events employees have been trained and are aware of AODA compliance requirements.

Moving forward to further our compliance, TRCA is taking the following steps:

- Our Information Technology and Records Management team will be performing an audit of all websites and content in early 2024 and will develop an action plan to address any gaps.
- Our Information Technology and Records Management team and Communications, Marketing and Events team will be focusing on consolidating websites under trca.ca.



Employment

TRCA is committed to fair and accessible employment practices that attract and retain talented employees and to limiting systemic biases in all aspects of employment. As such, TRCA is committed to meeting the requirements in the Employment Standards of the IASR and broader AODA requirements.

TRCA takes the following steps to notify the public and our employees that, when requested, TRCA will accommodate people with disabilities during the recruitment and hiring process, as well as during their employment with TRCA.

- During the recruitment process, TRCA notifies employees and the public about the availability of accommodation for applicants with disabilities and/or require accommodation. This information is included in the job postings.
- TRCA notifies job applicants who are invited to participate in the selection process that accommodations are available upon request pertaining to the materials/processes to be used. If the applicant requests accommodation, TRCA consults with the applicant and hiring manager and provides the most suitable accommodation.
- TRCA notifies all employees of TRCA's policies for accommodating employees with disabilities and/or employees requiring accommodations.
- TRCA has created and implemented a formal process for developing individual accommodation plans for employees with disabilities.
- TRCA has created a return-to-work process that includes documentation for those who have been absent due to a disability and require accommodation to return to work. The process outlines the steps TRCA takes to facilitate the return to work and is using a structured document plan to assist the employee in doing so.

Employment

Individual accommodation plans document the support and accommodation agreed to by the employee and TRCA. Standard accommodation plans include:

- The manner that the individual requesting the accommodation can participate in the development of the plan.
- The steps taken to protect privacy.
- TRCA has created a return-to-work process that includes documentation for those who have been absent due to a disability and require accommodation to return to work. The process outlines the steps TRCA takes to facilitate the return to work and is using a structured document plan to assist the employee in doing so.
- The frequency that the plan will be reviewed.
- The manner that the employee will be notified if an individual accommodation plan is requested and denied and the rationale for the request being denied.
- Providing the individual accommodation plan in a format that considers the disability and accommodation needs.



Procurement

When procuring goods or services, TRCA complies with the Accessibility for Ontarians with Disabilities Act, 2005, and any related TRCA policies and procedures. Where applicable, procurement documents specify the desired accessibility standards to be met and the related submission requirements and provide criteria in the documents with respect to the evaluation of those requirements.

- TRCA incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, including self-service kiosks. If it is not possible and practical to do so, we will provide an explanation upon request.
- TRCA have developed procurement guidelines and procedures that provide instruction to all TRCA employees on AODA compliance requirements.
- TRCA have a dedicated team of procurement professionals to guide and support TRCA employees during the procurement process.
- Whenever possible, TRCA uses the Provincial Vendor of Record (VOR) to select vendors for TRCA procured goods and services. This is a fully vetted and approved list of vendors by the Province of Ontario.
- TRCA have procurement policies that govern all procurement activity within TRCA, and all employees are informed about this policy. The policy is easily accessible on our TRCA intranet site.
- All external vendors procured to provide goods or services on behalf of TRCA are made aware of their obligations to be compliant with AODA legislation.

Design of Public Spaces

TRCA is committed to greater accessibility for persons with disabilities within and around its buildings and public spaces. As such, TRCA is dedicated to meeting the requirements of the Design of Public Spaces component of the IASR and broader AODA requirements. TRCA recognizes that the natural characteristics of much of the land owned by TRCA and the cultural heritage features of some of its structure's present limitations on the extent to which TRCA can develop fully accessible built features and remove barriers to accessibility for persons with disabilities. TRCA communicate what does and does not meet the requirements of the Design of Public Spaces standard of the IASR and provide alternatives wherever possible.

TRCA takes the following steps to ensure that all new and redeveloped public spaces are designed to meet Ontario's accessibility laws:

- TRCA consult with people with disabilities when designing public spaces, as required in the IASR.
- TRCA design and maintain all public spaces to meet the requirements of the Design of Public Spaces standard of the IASR, except in rare circumstances where there are reasons for exceptions.
- Reasons for exceptions to the requirements are documented by TRCA and retained in the TRCA corporate file for the project.
- TRCA comply with the Ontario Building Code's barrier-free standards.

Review, Update and Report

TRCA commits to the ongoing review and update of our accessibility policy and AODA multi-year plan through this continuous improvement journey.

TRCA is committed to:

- Continue to comply with the regulatory requirements.
- Monitor and audit accessibility on an annual basis to ensure continued compliance with the AODA and its corresponding standards as well as to identify opportunities to enhance accessibility beyond standard compliance.
- Report on improvements to accessibility for persons with disabilities to TRCA's Senior Leadership Team on an annual basis.
- Review and update our multi-year accessibility plan at least once every five years.



Additional Information

Questions and/or comments about TRCA's Multi-Year Accessibility Plan are always welcome.

Please contact Human Resources for further information:

Email: hr@trca.ca

Website: www.trca.ca

You can learn more about Ontario's AODA laws and standards by calling, emailing or using any of the websites noted below:

Toll-free: 1-866-515-2025

TTY: 416-326-0148 / Toll-free: 1-800-268-7095

Email: accessibility@ontario.ca

Websites:

www.ontario.ca/page/about-accessibility-laws

www.ontario.ca/laws/statute/05a11

