

# Accessibility for Persons with Disabilities Multi-Year Plan

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Toronto and Region Conservation  
2014–2023

# Table of Contents

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<b>Background</b>	<b>3</b>
<b>Training</b>	<b>5</b>
<b>Self-service Kiosks</b>	<b>7</b>
<b>Accessible Emergency Information</b>	<b>9</b>
<b>Customer Service</b>	<b>11</b>
<b>Feedback</b>	<b>13</b>
<b>Information and Communications</b>	<b>15</b>
<b>Employment</b>	<b>17</b>
<b>Design of Public Spaces</b>	<b>21</b>
<b>Review, Update and Report</b>	<b>23</b>
<b>For More Information</b>	<b>25</b>

# Background

# Background

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**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. A key component of this program of removing barriers to participation is the Accessibility for Ontarians with Disabilities Act (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 Communications;
- Employment;
- Transportation;
- Design of Public Spaces.

All standards, with the exception of Transportation, apply to TRCA.

The Integrated Accessibility Standards Regulation 191/11 (IASR) was enacted under the AODA, 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 and the Accessibility Standards for Customer Service Regulation 429/07 (ASCS). 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 aforementioned standards.

TRCA is considered a large organization under the IASR given that it employs over 400 full-time, 300 part-time and 300 seasonal staff in a variety of work environments.

The TRCA Accessibility for Persons with Disabilities Plan 2014-2023 outlines the steps that TRCA must take to improve opportunities for persons with disabilities, as required by the AODA, as well as an Accessibility Improvement Schedule.

# Training

# Training

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

TRCA will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessibility laws and regulations by **January 1, 2015**.

1. Ensure that every person who participates in the development of the policy, practices and procedures under the IASR and ASCS is trained appropriately in relation to TRCA's corresponding policies and procedures.
2. Ensure that every person who deals with the public on behalf of TRCA, including third parties (i.e. employees, agents, volunteers, management) must complete training in relation to TRCA's accessibility for persons with disabilities policies and procedures.

3. New employees, agents, volunteers, management, etc. shall receive training as soon as practicable, after being assigned.
4. Ongoing training on changes to policies, procedures, and new equipment shall be provided. The method and amount of training shall be geared to the trainee's level of responsibility in responding to the standards of the AODA.
5. Training records, including the dates when the training was provided, number of individuals to whom the training was provided, shall be kept.

TRCA initiated training of current employees, agents, volunteers, management, etc. in 2011, with all employees at the time having received training by January 1, 2012. Subsequent new employees, agents, volunteers, management, etc. received training as they were hired.

# Self-service Kiosks

# Self-service Kiosks

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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 [O. Reg. 191/11, s. 6 (5)].

TRCA will take the following steps to ensure that employees consider the needs of people with disabilities when designing, procuring or acquiring permanent and temporary self-service kiosks by **January 1, 2014**.

1. Ensure that every staff member 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.
2. Ensure that every staff member 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 will be provided.



# Accessible Emergency Information

# Accessible Emergency Information

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TRCA is committed to providing its customers and clients with publicly available emergency information. This will be accomplished by providing updates through the TRCA website and electronic mailing lists and at information kiosks at TRCA facilities. All information will be made in an accessible format at no additional charge upon request.

TRCA will also provide individualized emergency response information to employees with disabilities when necessary. With the employee's consent, TRCA shall provide the emergency response information to the individual designated to assist the employee. The individualized emergency response information shall be reviewed when the employee changes work locations within the organization, when the employee's accommodation needs are reviewed and when TRCA updates its general emergency response policies.

# Customer Service

# Customer Service

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**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. In order to do so, TRCA must provide customized solutions based on an understanding of the disability and/or barrier.**

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

1. Goods or services will be provided in a manner that respects the dignity and independence of persons with disabilities.
2. The provision of goods or services to persons with disabilities and others will be 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.
3. Persons with disabilities will be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services.
4. Persons with disabilities may use assistive devices and/or support persons in the access of goods and services.
5. TRCA employees communicating with a person with a disability shall do so in a manner that takes into account the person's disability.

# Feedback

# Feedback

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**Feedback from our customers provides TRCA with opportunities to learn and improve. TRCA recognizes the right of our customers to make a complaint, to compliment, or to suggest ways to improve our services.**

TRCA will ensure 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 will take the following steps, at no additional cost, by **January 1, 2015**.

1. 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.
2. The designated representative will respond 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.

3. TRCA employees will continue to respond in a timely and respectful manner to feedback received on matters regarding accessibility for persons with disabilities.

# Information and Communications

# Information and Communications

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

The TRCA website and content on its pages has conformed to Web Content Accessibility Guidelines (WCAG) 2.0, Level A since 2010. Guidelines for content development are coupled with training sessions for web content managers.

TRCA will take the following steps to make sure all publicly available information is made accessible upon request by **January 1, 2016**.

1. Research and provide general guidelines for accessible format development to all staff.

2. Ensure that TRCA Marketing and Communications designers receive detailed guidelines on how to make information available in accessible formats.
3. Incorporate accessible features into communication mediums, such as Braille into way-finding signs and American Sign Language interpreters at public meetings when requested.

TRCA will take the following steps to make all websites and content conform to WCAG 2.0, Level AA by **January 1, 2021**.

1. Update the guidelines and training for web content development to reflect the requirements of WCAG 2.0, Level AA.
2. Ensure that all staff who manages web content receives training on the requirements of WCAG 2.0, Level AA.



# Employment

# Employment

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

TRCA will take the following steps to notify the public and staff that, when requested, TRCA will accommodate people with disabilities during the recruitment and assessment processes and when people are hired by **January 1, 2016**.

1. During the recruitment process, TRCA shall notify its employees and the public about the availability of accommodation for applicants with disabilities. This will be included in the job posting.
2. TRCA shall notify job applicants who are invited to participate in the selection process for a job that accommodations are available upon request pertaining to the materials/processes to be used. If the applicant requests such an accommodation, TRCA shall consult with the applicant and provide for suitable accommodation with the ultimate decision resting with TRCA.
3. TRCA shall notify the successful applicant of TRCA's policies for accommodating employees with disabilities.

# Employment

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TRCA will take the following steps to develop and put in place a process for developing individual accommodation plans for employees with disabilities and return-to-work policies for employees that have been absent due to a disability by **January 1, 2016**.

TRCA shall develop and have in place a formal process for the development of documented individual accommodation plans for employees with disabilities. These plans will document the accessible formats/communication supports, and include individualized workplace emergency response information and other accommodations provided. The development process shall include:

1. the manner that the individual requesting the accommodation can participate in the development of the plan;
2. the means by which the employee is assessed;
3. the manner in which TRCA can request an evaluation by an outside expert (at TRCA's expense) to determine if and how accommodation can be achieved;

4. the manner in which the employee can request participation by the bargaining agent or another representative;
5. the steps taken to protect privacy;
6. the frequency that plans will be reviewed and updated;
7. if an individual accommodation plan is denied, the manner that the employee will be notified of the denial;
8. the means of providing the individual accommodation plan in a format that takes into account the disability.

Not overriding any other return to work process, TRCA shall develop a return to work process that includes a documentation process for those who have been absent due to a disability and require a disability related accommodation to return to work. The process shall outline the steps TRCA will take to facilitate the return to work and will use documented individual accommodation plans.

# Employment

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TRCA will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account when conducting performance management, career development and redeployment processes by **January 1, 2016**.

1. When conducting performance management processes, TRCA shall take into account the accessibility needs of employees with disabilities and individual accommodation plans.
2. When providing career development opportunities and advancements to its employees, TRCA shall take into account the accessibility needs of employees with disabilities and individual accommodation plans.
3. When redeploying employees, TRCA shall take into account the accessibility needs of employees with disabilities and individual accommodation plans.

TRCA will take the following steps to prevent and remove other accessibility barriers identified by **January 1, 2016**.

1. Notify current employees of its policies used to support employees with disabilities including job accommodations.
2. Notify new employees as soon as possible as to TRCA's policies/practices with respect to accessibility and provide information to all employees when changes are made to existing accessibility policies.
3. When an employee with a disability requests it, TRCA will consult with the employee then provide the information needed to perform their job, plus any other information that is available to other employees in accessible formats/communication support that is suitable, with the ultimate decision resting with TRCA.

# Design of Public Spaces

# Design of Public Spaces

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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, whenever possible. However, TRCA recognizes that the natural characteristics of much of the land owned by TRCA and the cultural heritage features of some of its structures present limitations on the extent to which TRCA can develop fully accessible built features and remove barriers to accessibility for persons with disabilities. TRCA will communicate what does and does not meet the requirements of the Design of Public Spaces standard of the IASR and will provide alternatives wherever possible.

Nonetheless, TRCA will take the following steps to ensure that all new and redeveloped public spaces are designed to meet Ontario's accessible laws by **January 1, 2017**.

1. Consult with people with disabilities when designing public spaces, as required in the IASR.
2. Design and maintain all public spaces to meet the requirements of the Design of Public Spaces standard of the IASR, unless an exception can be made.
3. Comply with the Ontario Building Code's barrier-free standards.
4. Reasons for exceptions to the requirements will be documented by the project manager and retained in the TRCA corporate file for the project, as well as filed with TRCA's accessibility lead.

# Review, Update, and Report

# Review, Update and Report

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The update of current accessibility policies and the development of a multi-year action plan are not the end of TRCA's commitment to removing and preventing barriers for persons with disabilities.

TRCA will do the following as it relates to TRCA's accessibility policies and multi-year accessibility plan.

1. Continue to conform to the regulatory requirements, whenever possible.
2. Monitor and audit accessibility improvements to ensure continued compliance with the AODA and its corresponding standards.
3. Report on improvements to accessibility for persons with disabilities to TRCA Directors Committee on an annual basis.
4. Prepare and make publicly available a report on accessibility achievements on an annual basis.
5. Review and update the multi-year accessibility plan every five years.



# For More Information

# For More Information

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Questions and/or comments about the TRCA Accessibility Plan are always welcome.

Please contact **Lisa Roberti**, Project Manager,  
Accessibility and Education Development

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**Website: [www.trca.on.ca](http://www.trca.on.ca)**

Since 2005, the Accessibility Directorate of Ontario (ADO) has been working with the disability, private and public sectors to develop and enforce accessibility standards, and promote greater accessibility awareness throughout Ontario. Contact the ADO for more information about the AODA, the IASR, the ASCS and resources on how to make Ontario accessible for everyone.

**Toll-free: 1-866-515-2025**

**TTY: 416-325-3408 / Toll-free: 1-800-268-7095**

**Email: [accessibility@ontario.ca](mailto:accessibility@ontario.ca)**

**Website: <http://ontario.ca/AccessON>**

Free resources available at [publications.serviceontario.ca](http://publications.serviceontario.ca)

Alternate formats of this document are available free upon request.