

Date: 2021-02-24

Subject: **Accessibility at the City of Brampton**

Contact: **Teresa Olsen, Deputy Clerk, Administrative Services and Elections**

Report Number: Legislative Services-2021-278

Recommendations:

That the report titled Accessibility at the City of Brampton, to the Committee of Council meeting of March 10, 2021, be received.

Overview:

- **The City of Brampton’s Accessibility Office works collaboratively with City departments in facilitating and supporting the City’s goal of creating a City that is accessible to individuals of all abilities**
- **At the May 27th, 2020 Council meeting, Councillor Medeiros requested an update on the City’s progress related to accessibility accomplishments and scorecard.**
- **This report provides Committee with an update on the City’s responsibilities and progress related to accessibility, and future direction in both meeting legislative requirements and enhancing accessibility at the City.**

Background:

During the May 27, 2020 City Council meeting, during consideration of an Announcement regarding National AccessAbility Week – May 31-June 6, 2020, Council discussion included the City’s progress on accessibility matters, with staff advising an information report would be brought forward to a future meeting regarding the City’s accessibility program, accomplishments and scorecard in relation to legislative requirements.

Although a formal “measuring” process does not exist, staff undertook a review of the City’s existing accessibility program and a consultation exercise with numerous municipalities to understand how others are working towards meeting legislative requirements and improving accessibility in their communities.

This report provides an overview of the City’s accessibility program and accomplishments.

Current Situation:

The City of Brampton has taken, and continues to take, a very progressive approach to addressing barriers to accessibility. Not only has this commitment improved the quality of life for residents of Brampton, it has provided a foundation upon which the City will continue to build an inclusive community that meets the needs of individuals of all ages and abilities.

Appendix 1 sets out the Accessibility Legislative Framework in Ontario and City of Brampton Context. The following information provides an overview of the current Accessibility Program, municipal benchmarking, and legislative compliance.

Accessibility Program

The City’s Accessibility Team consists of two dedicated staff that report to the Deputy Clerk, Administrative Services and Elections within the City Clerk’s Office. This team works collaboratively with staff across City departments in coordinating, consulting and providing guidance related to accessibility for City facilities, exterior public spaces, parking, access to information, programs and services. The role of the Accessibility Team include:

- Strategizing, planning & executing on the City’s accessibility program, including the Municipal Accessibility Plan (MAP) - Appendix 3
- Consulting on the design, development and construction of new City facilities and exterior public spaces including retrofit and renovation of existing facilities/public spaces that the City owns, operates or leases
- Consulting and guiding on digital accessibility relating to the City of Brampton website, accessible documents, alternate format, etc.
- Developing and delivering staff training programs
- Organizing special accessibility events & awards
- Supporting the legislated Accessibility Advisory Committee

- Providing consultation and recommendations on site plans, capital plans, outdoor spaces and park planning
- Preparing accessibility plans & compliance reports to confirm the City has met it's requirements under the Accessibility for Ontarians with Disabilities Act (AODA)
- Liaising with stakeholders for provision of accessible transportation and accessible parking requirements

The Accessibility Team organizes internal “awareness events” to educate and inform City employees on how to identify, remove and reduce barriers to ensure individuals of all abilities have access to City services, programs and facilities. The team has held a variety of hands-on events where participants have the opportunity to gain perspective on how individuals with disabilities complete certain tasks.

Due to the COVID-19 health crisis in 2020, an event was held virtually and City employees had an opportunity to participate in activities such as a scavenger hunt, podcasts, learning courses, training videos and awareness simulation exercises. Taking an opportunity to maximize the virtual environment during this period, a public component allowed both employees and community members to participate in an [accessibility conversation](#) with community activist Maayan Ziv. Maayan is the founder of the AccessNow app, a crowdsourced app to map the accessibility status of locations worldwide, and she is the recipient of the 2020 Governor General's Innovation Award.

The Accessibility Team is a member of a knowledgeable and collaborative professional municipal and public sector accessibility network, which consists of accessibility staff and experts from around the Province. This group regularly shares information, consults with each other and builds upon expertise to improve policies and processes related to accessibility. At the November 5th, 2020 Ontario Network of Accessibility Professionals (ONAP) fall meeting, the Province provided an update on AODA legislative requirements and in particular public sector organization's responsibility to meet the Web Content Accessibility Guidelines (WCAG) for website content. This information will assist the City as it implements the requirements.

The Accessibility Team is actively involved in many of the City's built environment processes and provides regular reviews and feedback related to site plans, capital plans parks and trails. The Team consults with Transit and Public Works and Engineering on accessible public transportation processes and traffic matters (walkways, crosswalks, traffic signals, curb cuts, etc.) and works with Interior Design and Facilities on enhancing internal City spaces to be accessible for all. The Team provides feedback with an accessible lens on communication tools (posters, signage, advertising documents), software programs, and website content. They offer general and

department specific training modules, host accessibility awareness events for staff and provide a variety of resources on the internal Accessibility Service Card for staff educational purposes.

City departments are ultimately responsible for maintaining accessibility standards for their specific business units in consultation with the Accessibility Team. It is a collaborative effort with business partners on accessibility matters to build awareness, capacity and service delivery with an accessibility lens. Although the Team believes that education and awareness is a key factor in designing facilities, services and programs with accessibility in mind, they also acknowledge that accessibility is a legislated responsibility that not only has statutory and financial consequences but can also result in reputational harm to the City.

The Team recognizes the important role that Council and Senior Leadership play in being Accessibility Champions. This is not only achieved through implementing accessibility policies but by both leading and inspiring excellence in the provision of accessible customer service, and setting an example for private industry to incorporate accessibility in their industries to ensure Brampton is an accessible community for all. The success of the City's accessibility program is contingent on its leaders serving as role models and ensuring that the City serves individuals of all ages and abilities.

Benchmarking

The Accessibility Team recently consulted with municipalities across Ontario to gather an understanding of how their Accessibility functions work (see Appendix 4). Through the consultation process, it is clear that there is not a "one-size fits all" approach to focus on accessibility in an organization. There is advocacy and frameworks in many of the organizations in relation to meeting and enhancing accessibility needs and each municipality is working within its means to address accessibility matters, meet AODA regulations, legislative deadlines and work to promote communities that are accessible for all. In addition to the size of the municipality, many factors impact an organization's ability to successfully incorporate accessibility into its processes including:

- Leadership support
- Staff resources
- Budget constraints
- Departmental "buy-in" and backing
- Communication plans
- Prioritization of organizational needs

- Understanding of what Accessibility is and means
- Legislative limitations (i.e. both the national and provincial Building Codes need to be updated to ensure accessibility needs are not a “minimum requirement” but rather standards that are fit for all)

The consultation also highlighted the need for the Province to take more responsibility in supporting organizations to meet the legislative requirements through funding, provision of shared resources, a dedicated enforcement body and stronger direction on how organizations should be incorporating the Accessibility function into their structures.

Comparing processes with those who participated in the consultation resulted in an understanding that the City of Brampton is in alignment with other municipal counterparts and in some areas exceed in the area of Accessibility. It is acknowledged that there are areas that need improvement to continue to meet AODA requirements and enhance accessibility across the City. The Team feels confident that through the support of Council and staff, we can continue to make Brampton a city where individuals of all abilities have the opportunity to live, work and play.

Rick Hansen Foundation Accessibility Certification (RHFAC)

Through strong inter-departmental partnerships, the City is able to accomplish a number of goals related to accessibility. An example of this is the cross-functional pilot project with the Rick Hansen Foundation Accessibility Certification (RHFAC) Program funded by the Province of Ontario. As a result of this project, 10 City facilities will be assessed and rated by an RHFAC Professional, including:

- City Hall
- Gore Meadows Community Centre and Library
- Cassie Campbell Community Centre
- BFES Apparatus and Maintenance Facility
- Bramalea transit Terminal
- Brampton Gateway Transit Terminal
- Rose Theatre
- Lester B. Pearson Theatre
- POA Courthouse
- Springdale Library

This will provide a report card for each facility that identifies the areas of success in meeting accessibility requirements as well as the areas where improvement is needed as it relates to:

- Vehicular Access
- Exterior Approach and Entrance
- Interior Circulation
- Interior Services and Environment
- Sanitary Facilities
- Signage, Wayfinding and Communications
- Emergency Systems
- Additional Use of Spaces

“The RHFAC is a national rating system that measures and certifies the level of meaningful access of buildings and sites”¹. The rating survey, which is updated every three years, provides organizations a way to better understand their physical accessibility, how they can identify barriers and improve accessibility within spaces. The goal is to use these report cards as a measure to ensure City facilities continue to remove and reduce barriers for people with disabilities so that all of our residents and visitors have equal access to City buildings, services and programs.

The RHFAC assessment of the 10 City facilities is currently underway and it is anticipated results will be reported to Council through the Accessibility Advisory Committee later this year.

AODA Compliance

As reported in the City’s current MAP (Appendix 3), the City continues to strive to achieve compliance with the AODA requirements as per the associated timelines (Appendix 2). In 2020, staff have identified a few areas where more focus is needed to ensure those legislative requirements are met, and continue to be met. To address these areas the Team will be establishing and updating a comprehensive Accessibility Policy, Web Accessibility Policy, revised Standard Operating Procedures (SOPs), and additional learning resources throughout 2021. The Team will be creating an internal working committee consisting of staff representation from each of the key City departments to ensure functional programs and services are being reviewed to adhere to accessibility requirements, implement the necessary accessibility capacities and provide reporting information to the Province related to the City’s accessibility compliance efforts.

The Accessibility Team recognized a gap in the corporate-wide accessibility training requirements and in 2020 worked towards developing an online training course to

¹ https://www.rickhansen.com/become-accessible/rating-certification?gclid=EAlalQobChMIp5W_3NLA7AIViuzjBx0QCAMKEAAYASAAEgIkOfD_BwE

incorporate into the City's Learning Management System (LMS). This new course allows for a consistent approach in the provision of accessibility training and fulfills the City's training obligations under the Integrated Accessibility Standards regulation (IASR). Using the LMS provides a mechanism to maintain accurate record keeping for all individuals trained. The training will be available to all existing elected officials, City employees and Advisory Board Members in Q1 and Q2 with an expectation of completion in 2021, and will be a requirement for anyone joining the organization in the future.

Under the regulations, training is required for every person who is an employee of, or a volunteer with the City, persons who participates in developing policies for the City and every other person who provides goods, services or facilities on behalf of City. Processes for rolling the training out to these additional individuals will be developed throughout the year.

January 1, 2021 was a key deadline whereby municipalities were required to make all websites and web content accessible. The Digital Innovation and Information Technology (DI&IT) Team has been working on this component over the past few years and have implemented digital architecture, various software programs, tools and resources to help the City meet this mandate and ensure the City becomes and continues to remain compliant. The Accessibility Team and DI&IT continue work on this requirement and commit to provide resources and guidance to City departments to meet objectives with respect to any content they maintain or place on the City's website. All City staff will need to be diligent in ensuring the City meets these standards. This will be accomplished by focusing on creating accessible content and documents and using both the technology available to them and completing a hands-on review of content to ensure digital information and services is accessible before it is released to the public or posted on the website to provide all residents equal access to information.

In December 2020, the City was selected for an AODA desk audit by the Ministry of Seniors and Accessibility to confirm the City is in compliance with the AODA and its associated accessibility standards. The audit included review of the following areas:

- The establishment of an Accessibility Advisory Committee
- Accessibility policies
- Multi-year accessibility plan
- Procurement and self-service kiosks
- Accessibility training
- Accessibility feedback processes
- Accessible employment policies

The audit submission is currently being reviewed by the Ministry and it is anticipated that the results of the audit should be received within the next few months.

Corporate Implications:

Financial Implications:

The accessibility program is included within the City Clerk's Office current budget and sufficient resources exist for current program delivery. Currently the Accessibility Team maintains a nominal base budget for general training, awards and event expenditures with special projects budgeted when they are required. Financial resources captured within each department's capital and operating budgets are utilized to address their respective areas of responsibility for accessible program and service delivery.

Other Implications:

Term of Council Priorities:

This report fulfills the Council Priority of the City of Brampton as a Mosaic and Well-run City, recognizing the City's continued commitment towards accessibility for all residents of Brampton. The City Clerk's Office strives to promote accessibility for all as a key priority in its day-to-day business and future planning.

Conclusion:

As requested by Council, this report provides an overview of the City's Accessibility Program, accomplishments and compliance with prevailing legislative requirements. Benchmarking with comparable accessibility programs in other municipalities shows the City is in alignment with consistent accessibility practices. Staff continue to work diligently to ensure the City can meet and/or exceed the AODA requirements. With Council and Senior Leadership direction and support, we will continue to enhance accessibility within our facilities, programs and services.

The City strives to make Brampton a place for people of all abilities. Brampton is a hallmark of diversity and it is important that people perceive diversity not only about age, gender, economics, culture or ethnicity but also about different abilities because inclusion, regardless of ability, is also our strength in diversity.

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Attachments:

Appendix 1 - Accessibility Legislative Framework and City of Brampton Context
Appendix 2 - AODA Prescribed Timelines
Appendix 3 - Municipal Accessibility Plan
Appendix 4 - Municipal Comparison