



# **Toronto Waterfront Revitalization Corporation**

## **Multi-Year Accessibility Plan**

**2020-2025**

(Updated June 2021)

**THIS DOCUMENT IS AVAILABLE IN ALTERNATE FORMATS  
UPON REQUEST**

## **STATEMENT OF COMMITMENT**

### **Statement of Organizational Accessibility Commitment**

Waterfront Toronto values openness, equality and inclusivity and is committed to the principles outlined in the *Accessibility for Ontarians with Disabilities Act, 2005* (hereinafter “**AODA**”) and to meeting the needs of people with disabilities, in a timely manner, through the implementation of the requirements of the AODA.

Waterfront Toronto continues to address the needs of persons of all ages and abilities by allowing them to maintain their dignity and independence. We will achieve this through the prevention and removal of barriers to accessibility in accordance with the AODA.

## **MEETING OUR ACCESSIBILITY COMMITMENT**

### **The 2020 Waterfront Toronto Five-Year Accessibility Plan**

This updated Five-year Accessibility Plan (also referred to in this document as the multi-year accessibility plan or the “2020 Plan”) reaffirms our commitment that was created to ensure that Waterfront Toronto is in compliance with Section 4 of the Integrated Accessibility Standards Regulation (as defined in Ontario Regulation 191/11, made under the AODA, hereinafter the “**IASR**”), which requires large organizations like Waterfront Toronto to establish, implement, maintain and document a multi-year accessibility plan by January 1, 2014 (the “2014 Plan”).

This 2020 Plan will summarize Waterfront Toronto’s commitments and continued compliance to the AODA and IASR since the 2014 Plan to the present.

Since the 2014 Plan, key changes in the IASR have been implemented related to requirements for accessibility practices on recreational trails, beach access routes, outdoor public use eating areas, outdoor play spaces; exterior paths of travel, obtaining services and maintaining accessible parts of our public spaces under the Design of Public Spaces Standards and Accessibility Standards for the Built Environment in Part IV.1 of the IASR.

## **OUR DETAILED PLAN STRATEGIES**

### **GENERAL REQUIREMENTS**

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Waterfront Toronto will ensure that it continues to comply with General Requirements under Part I of the IASR.

#### **General Requirements**

##### **i. Accessibility Policy**

Section 3 of the IASR requires large organizations to develop, implement and maintain policies governing how they will achieve accessibility requirements. Section 3 also requires private sector organizations to have a statement of commitment and to use reasonable efforts to make their policies consistent with the principles of dignity, independence, integration and equal opportunity.

##### **ii. Multi-year Accessibility Plan**

Section 4 of the IASR requires large organizations such as Waterfront Toronto to create a multi-year accessibility plan, as well as review and update the plan at least once every five years. Waterfront Toronto is also required to post a copy of our policies and plans on our website and to provide alternate formats upon request.

Waterfront Toronto has met these requirements as set out below.

- AODA policy Guideline #30 drafted and posted in accordance with the Accessibility Standards for Customer Service Ontario Regulation 429/07 (now Part IV.2 of IASR) is available on our website. It is available on our website and in alternate formats on request.
- AODA policy Guideline #31 drafted and posted in accordance with the IASR is available on our website. It is available on our website and in alternate formats on request. It is available on our website and in alternate formats on request.
- Waterfront Toronto's commitment to accessibility is part of our accessibility policies and this Multi-year Accessibility Plan: it includes goals which encompass the principles of dignity, independence, integration and equal opportunity.
- Waterfront Toronto completed a Multi-year Accessibility Plan before the due date of January 1, 2014 and updated the plan in December of 2017.
- Waterfront Toronto updated the 2014 Plan a second time with this 2020 Plan.

- Waterfront Toronto’s Multi-year Accessibility Plan and two related policies are posted on our website. Print copies and alternate formats are available on request. We will continue to review and update these policies as determined appropriate.

## **CUSTOMER SERVICE STANDARDS**

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Waterfront Toronto has enacted the AODA Customer Services Standards, in accordance with Part IV.2 of the ISAR. Waterfront Toronto will continue to ensure that in all day-to-day customer service activities, all requirements of this Regulation are fulfilled and are in keeping with the principles of dignity, independence, equality and integration. More specifically:

- Waterfront Toronto will continue to provide accessible customer service training to every person who deals with members of the public or who participates in developing our policies, practices and procedures governing the provision of goods and services to the public including all associates, contractors and others who provide service on behalf of Waterfront Toronto.
- Waterfront Toronto will continue to gather feedback on the goods and services it provides and acts on that feedback to improve services to people with disabilities.
- Waterfront Toronto will continue to post appropriate notices regarding service disruptions.
- Waterfront Toronto will continue to ensure that any new policies that are created regarding customer service are consistent with the principles of dignity, independence, integration and equal opportunity.
- Waterfront Toronto will continue to welcome people with disabilities who use assistive devices such as support persons or service animals, and will train staff on assistive devices used in Waterfront Toronto facilities.
- Waterfront Toronto will continue to provide prior notice of a fee for a support person where and if it is charged.
- Present and new websites developed by Waterfront Toronto and content on those sites will be compliant this year with WCAG 2.0 Level AA. Some complex content will be posted online or will have alternative formats available on request.
- Waterfront Toronto will have regard to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

## **INFORMATION AND COMMUNICATION STANDARDS**

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### **Accessible Formats and Communication Supports:**

Section 12 of the IASR requires by January 1, 2016 that all large organizations provide or arrange for information in accessible formats and communication supports for persons with disabilities on request. Waterfront Toronto will ensure that requested information is:

- Provided in a timely way.
- Provided at no extra cost.
- Provided following consultation with the person making the request to determine the most appropriate format or support.

### **Accessible Websites and Web Content:**

Sections 12 and 14 of the IASR requires accessible formats and websites, respectively. All present and new internet websites or websites undergoing a major refresh, and web content on those sites, will conform to Web Content Accessibility Guidelines or WCAG at the 2.0AA level. Our plan:

- A review of the current and pending websites will be conducted to determine the level of accessibility provided.
- Web developers and web content providers will be trained on WCAG in relation to their duties.
- Internal expertise is being developed to ensure on-going accessibility requirements for all internet websites and content are achieved.
- Our websites will conform to requirements of the Web Content Accessibility Guidelines or WCAG as required this year, except for those that are too complex. Other formats will be posted online or made available on request.

### **Emergency Procedures and Safety Information:**

Section 13 of the IASR requires emergency procedures, plans and public safety information conform to accessibility standards. Waterfront Toronto will ensure,

- Our Multi-year Accessibility Plans include preventative and emergency maintenance procedures for the accessible parts of our public spaces,

including posting of regular maintenance schedules and letting people know about alternatives.

- Procedures for handling temporary disruptions in service, when an accessible part of our public spaces stops working or becomes inaccessible, are added to the Plan.

### **Feedback:**

Section 11 of the IASR requires that feedback processes be accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports on request. Waterfront Toronto will also notify the public about the availability of accessible formats and communication supports.

- Waterfront Toronto accepts feedback through its website and those other means as required.
- Alternate formats are available on request for all feedback forms.

## **EMPLOYMENT STANDARDS**

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All of Waterfront Toronto's Employment practices must be accessible. Waterfront Toronto ensures that all corporation employment practices throughout the employment life cycle meet these standards of accessibility. Waterfront Toronto is also required to provide or arrange for information in accessible formats and communication supports for persons with disabilities on request.

### **Workplace Emergency Response:**

Waterfront Toronto meets the requirements of Section 27 of Accessible Employment Standards within the IASR. Under this section, Waterfront Toronto is required to provide individualized workplace emergency response information to employees who have a disability. If an employee with individualized workplace emergency response information requires assistance, and provides consent, Waterfront Toronto will ensure that the necessary information is shared.

Waterfront Toronto employees have been notified of our commitment to work with them to create individual workplace emergency response information. The availability of accommodations is communicated to all employees on a regular basis. Alternate formats are available and used if required by specific employees. Our respectful process ensures privacy for people who self-identify as needing accommodation.

Large organizations like Waterfront Toronto must ensure that employees and volunteers are trained on the IASR and Human Rights Code. Waterfront Toronto must also ensure

that feedback processes are accessible to persons with disabilities and that accessible formats and communication supports are provided upon request.

Waterfront Toronto staff either have been or will be trained on the accessibility standards referred to in IASR and on the Human Rights Code. The training targeted all employees. Waterfront Toronto will ensure that those who deal with members of the public or who participates in developing Waterfront Toronto' policies, practices and procedures governing the provision of goods and services to the public; including all associates, contracted employees and others who provide service on Waterfront Toronto's behalf will be trained.

- Waterfront Toronto will provide the required training to its employees, as appropriate to the duties of that employee.
- Waterfront Toronto will maintain records of training including the dates and number of trained people.
- New employees and volunteers will receive training on the Accessibility Standards for Customer Service Regulation, on the IASR and on the Human Rights Code during their orientation period.
- Waterfront Toronto ensures that all new staff receives training on the requirements of the relevant IASR standards, with particular emphasis on integration of the needs of people with disabilities.
- Weblinks to Waterfront Toronto AODA policies will be provided for employees to access at anytime.
- Waterfront Toronto's vision is to work with the community and public and private sector partners to create waterfront parks, public spaces, cultural institutions, and diverse sustainable commercial and residential communities.
- Waterfront Toronto welcomes feedback in person, by mail, email, telephone and fax. The public is also encouraged to provide feedback using the Waterfront Toronto website or through social medial networks (Twitter and Facebook).

### **Recruitment:**

In compliance with Sections 23 and 24 of the IASR,

- Waterfront Toronto notifies its employees and the public about the availability of accommodations for applicants with disabilities during the interview process.

- Waterfront Toronto will notify successful applicants of its policies for accommodating employees with disabilities when offering employment. This notice will be included in the letter of offer to the successful applicant.

### **Informing Employees with Disabilities of Supports available to them:**

In compliance with Section 25 of the IASR,

- Waterfront Toronto will inform all employees of its policies for supporting employees with disabilities, including providing employment-related accommodations. Information will be provided through newsletters, staff memos, email and staff meetings.
- New employees will be informed on how to access this information during the on-boarding/welcome process.
- All employees will be given updated information whenever there is a change to existing policies on the provision of job accommodations.
- Employees will be assured that their privacy is respected and that any sharing of information about their accommodation needs will be discussed with them, and plans for communication made, with their consent.

### **Accessible Formats and Communication Supports for Employees:**

In compliance with Section 26 of the IASR,

- Waterfront Toronto will consult with employees who have disabilities to provide them with the accessible formats and communication supports they require to do their job effectively.

### **Individual Accommodation Plans**

In compliance with Section 28 of the IASR,

- Waterfront Toronto will have in place a written process for the development of documented individual accommodation plans for employees with disabilities, including the following elements:
  - The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;
  - The means by which the employee is assessed on an individual basis;
  - The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the



employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved;

- The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan;
- The steps to be taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee; and
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Waterfront Toronto's individual accommodation plans will,

- If requested, include any information regarding accessible formats and communications supports provided by Waterfront Toronto.
- If required, include individualized workplace emergency response information.
- Identify any other accommodation that is to be provided.

## **Return to Work**

In compliance with Section 29 of the IASR,

- Waterfront Toronto has a process for the provision of accommodations, where needed, when an employee returns to work:
  1. Human Resources will evaluate and approve the current return to work process.
  2. Modified work or specific accommodations may be provided.

3. Human Resources will coordinate the appropriate return to work training, as required.
- Waterfront Toronto will formally document this process, in compliance with Section 29 of the IASR.

### **Performance Management and Career Development**

In compliance with Sections 30 and 31 of the IASR,

- Waterfront Toronto will review the accessibility needs of employees with disabilities with regard to performance management and career development in a manner that takes their accessibility needs into account and may include, for example, the use of performance plans in accessible formats as well as coaching and feedback.

### **Redeployment**

In compliance with Section 32 of the IASR,

- Waterfront Toronto will review the accessibility needs of employees with disabilities, as well as accommodation plans, with regard to employee reassignment to other departments or jobs within our organization as an alternative to lay off, when we have eliminated a certain job or department.

## **DESIGN OF PUBLIC SPACES**

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When building new or making major changes to existing public spaces, larger organizations like Waterfront Toronto must meet applicable requirements under Part IV.1 of the IASR related to public spaces including: recreational trails, beach access routes, outdoor public use eating areas, outdoor play spaces, exterior paths of travel, obtaining information and maintenance of accessible public spaces.

**Recreational Trails:** Waterfront Toronto ensures,

All technical requirements of its recreational trails are met, with the exception of,

- Trails solely intended for cross-country skiing, mountain biking or the use of motorized snow vehicles or off-road vehicles;
- Wilderness trails, backcountry trails and portage routes.

The public and persons with disabilities will be consulted on the matter of technical requirements before constructing new or redeveloping existing recreational trails.

**Beach Access Routes:** Waterfront Toronto ensures,

- All technical requirements of routes that are constructed and are intended for pedestrian use by the public and that provide access from off-street parking facilities, recreational trails, exterior paths of travel and amenities to an area of a beach that is intended for recreational use by the public are met.
- All technical requirements are met for areas where a recreational trail or beach access route is equipped with,
  - Boardwalks.
  - Ramps.

**Outdoor Public Use Eating Areas:** Waterfront Toronto ensures,

- All technical requirements of outdoor spaces that consist of tables that are found in public areas such as public parks, and are specifically intended for use by the public as a place to consume food, will be met.

**Outdoor Play Spaces:** Waterfront Toronto ensures,

- All technical requirements of outdoor spaces that include play equipment, such as swings, or features such as logs, rocks, sand or water, where the equipment or features are designed and placed to provide play opportunities and experiences for children and caregivers, will be met.
- The public and persons with disabilities will be consulted on the needs of children and caregivers with various disabilities before constructing new or redeveloping existing outdoor play spaces.

**Exterior Paths of Travel:** Waterfront Toronto ensures,

All technical requirements for structures that are connected to, and provided on or along exterior paths of travel will be met, including:

- Ramps.
- Stairs.
- Curb Ramps.
- Depressed Curbs.
- Rest Areas.

**Obtaining Services**

**Service Counters:** Waterfront Toronto will ensure,

- At least one service counter is accessible to people who use mobility aids.
- Service counters are low enough to be used by someone sitting in a mobility aid.
- Service counters have sufficient clear space for someone sitting in a mobility aid, including space for the person's knees.
- Accessible service counters are identified with accessible signage.

**Fixed Queuing Guides:** Waterfront Toronto will ensure,

- New fixed queuing guides provide sufficient width to allow for the passage of mobility aids and mobility assistive devices.
- New fixed queuing guides have sufficiently clear floor area to permit mobility aids to turn where queuing lines change directions.
- New fixed queuing guides are cane detectable.

**Waiting Areas:** Waterfront Toronto will ensure,

- Within newly constructed or redeveloped waiting areas, with seating fixed to the floor, at least three percent of seating is accessible to someone using a mobility aid.
- All waiting areas will have at least one accessible seating space.

**Off-street Parking Facilities:** Waterfront Toronto will ensure,

- Newly constructed or redeveloped off-street parking will meet the accessibility requirements as outlined in applicable sections of the IASR, including ensuring that there are appropriate access aisles and there are at least the minimum number and type of accessible parking spaces.
- When maintenance work is being performed at off-street parking facilities, or there are temporary disruptions at such facilities, if accessible parking spaces are impacted, Waterfront Toronto will, to the extent reasonably practicable, post public notices at the facility, provide alternate accessible parking spaces, and provide directions to other nearby parking facilities where accessible parking facilities may be available.

## **Maintenance**

Waterfront Toronto will ensure,

- Our Multi-year Accessibility Plan includes preventative and emergency maintenance procedures for the accessible parts of our public spaces, including posting of regular maintenance schedules and letting people know about alternatives.
- Procedures for handling temporary disruptions in service, when an accessible part of our public spaces stops working or becomes inaccessible, are added to the Plan.

### **Waterfront Toronto Welcomes Your Feedback**

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