

Integrated Accessibility Standards Regulation Policies and Procedures

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1. Purpose

Under the Accessibility for Ontarians with Disabilities Act, 2005 all public and private sector organizations must meet the requirements of accessibility standards established by regulation. This policy establishes the Integrated Accessibility Standards Regulation in the areas of Employment, Information and Communications, Transportation and Public Spaces for the Corporation of the Town of Orangeville in accordance with Ontario Regulation 191/11, Ontario Regulation 413/12 and with the Ministry of Community and Social Services intent to "streamline, align and phase-in accessibility requirements and allow for progress on accessibility and reduce the regulatory burden for obligated organizations". The Integrated Accessibility Standards Regulation came into force July 1, 2011.

2. Scope and Responsibilities

This policy has been drafted in accordance with the regulation and addresses how the Corporation of the Town of Orangeville achieves accessibility through meeting the regulation's requirements. It provides the overall strategic direction that we will follow to provide accessibility supports to Ontarians with disabilities.

The requirements of the Regulation include the following four (4) items:

- •Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Regulation;
- Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities;
- Training; and
- •Other specific requirements under the Information and Communications, Employment Transportation Standards and Public Spaces.

3. Policy Statement and Organizational Commitment

The Corporation of the Town of Orangeville is committed and guided by the four (4) core principles of Dignity, Independence, Integration and Equal Opportunity and supports the full

inclusion of persons as set out in *Canadian Charter of Rights and Freedoms*, and the *Accessibility for Ontarians with Disabilities Act*, 2005.

The Corporation of the Town of Orangeville shall use every effort to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy.

4. Definitions

Below is a list of twenty one (21) definitions in alphabetical order used in this policy:

Accessible Formats may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Accommodation means the special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

Beach Access 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.

Communication Supports may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Communications means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

Conventional Transportation Service Provider means a designated public sector transportation organized that provides conventional transportation services that operates soley within the Province of Ontario.

Ready means an electronic or digital format that facilitates conversion into an accessible format.

Designated Public Sector Organization means every municipality and every person or organization listed in Column 1 of Table 1 of Ontario Regulation 146/10 (Public Bodies and Commission Public Bodies — Definitions) made under the *Public Service of Ontario Act, 2006*.

IAP means Individualized Accommodation Plan.

Information includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Internet Website means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

Maintenance of Public Spaces means activities that are intended to keep existing public spaces and elements in existing public spaces in good working order or to restore the spaces or elements to their original condition, examples of which include painting and minor repairs.

Medical Aid means an assistive device including respirators, and portable oxygen supplies.

Mobility Aid means a device used to facilitate the transport, in a seated posture, of a person with a disability.

Mobility Assistive Device means a cane, walker, wheelchair, scooter or similar aid.

New Internet Website means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Redeployment means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

Recreational trails means public pedestrian trails that are intended for recreational and leisure purposes.

Specialized Transportation Services means public passenger transportation services that operate solely with the Province of Ontario, are provided by a designated public sector transportation organization and are designed to transport persons with disabilities.

Unconvertible means if it is not technically feasible to convert the information or communications. It also means if the technology to convert the information or communications is not readily available.

Web Content Accessibility Guidelines means the World Wide Web consortium recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines" (WCAG) 2.0.

5. General Provisions

This section covers the general requirements of the Integrated Accessibility Standards Regulation.

Multi-Year Accessibility Plan

The Corporation of the Town of Orangeville's Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005.* The Corporation of the Town of Orangeville will report annually on the progress and implementation of the plan, post the information on our website and will provide it in alternative formats upon request. The plan will be reviewed and updated at least once every five years. For further clarification and specific details you can also refer to our 2013-2018 Accessibility Plan.

Procuring or Acquiring Goods, Services or Facilities

The Corporation of the Town of Orangeville will use accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practical to do so, in which case, if requested we will provide an explanation.

Training

The Corporation of the Town of Orangeville will ensure that training is provided to all employees and regular fee-for-service staff on the requirements of the accessibility standards referred to in the regulation and on the *Human Rights Code* as it pertains to persons with disabilities. Training will be provided as soon as practicable. If any changes are made to this policy or the requirements training will be provided. We shall maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

6. Information and Communications Standard

The Corporation of the Town of Orangeville will create, provide and receive information and communications in ways that are accessible to people with disabilities.

If the Corporation of the Town of Orangeville determines that it is not technically feasible to convert the information or communications or the technology to convert the information or communications is not readily available, we will be obligated to provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications. For further clarification and specific details you can also refer to our 2013-2018 Accessibility Plan.

7. Emergency Information

If the Corporation of the Town of Orangeville prepares emergency procedures, plans or public safety information and makes the information available to the public, we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

8. Feedback

The Corporation of the Town of Orangeville has a process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request. We will notify the public about the availability of accessible formats and communication supports.

9. Accessible Formats and Communication Supports

The Corporation of the Town of Orangeville shall be obligated to provide or arrange for accessible formats and communication supports for persons with disabilities for the four situations listed below:

- Upon request in a timely manner that takes into account the persons' accessibility needs due to a disability;
- ii. At a cost that is no more than the regular cost charged to other persons;
- iii. Consult with the person making the request and determine suitability of an accessible format or communication support;
- iv. Notify the public about the availability of accessible formats and communication supports.

10. Website Accessibility

The Corporation of the Town of Orangeville shall make their internet website and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2014, any new web content will conform with WCAG 2.0 Level A. By January 1, 2021 all internet website and web content will conform with WCAG 2.0 Level AA.

11. Education, Training and Materials

This section applies to educational or training institutions.

Public Libraries

The Corporation of the Town of Orangeville's two public libraries shall adhere to the three (3) points below;

- Public Libraries shall provide access to or arrange for the provision of access to accessible materials where they exist;
- Public Libraries shall make information about the availability of accessible materials
 publicly available and shall provide information in accessible format or with appropriate
 communication supports, upon request;
- Public Library Boards may provide accessible formats for archival materials, special collections and rare books.

12. Employment Standard

The Employment Standard builds upon the existing requirements under the *Ontario Human Rights Code* in relation to how we will provide accessibility throughout the entire employment cycle. It applies in respect to employees and does not apply to volunteers and other non-paid individuals.

The requirements of the Employment Standard shall be met by the Corporation of the Town of Orangeville by January 1, 2014 unless otherwise specified. For further clarification and specific details you can also refer to our 2013-2018 Accessibility Plan.

13. Recruitment

The Corporation of the Town of Orangeville shall notify employees and the public about the availability of accommodations for applicants with disabilities for the three (3) situations below:

- During the recruitment process when job applicants are individually selected to participate in an assessment or selection process;
- ii. If a selected applicant requests an accommodation, the Corporation of the Town of Orangeville shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability;
- iii. Notify successful applicants of the policies for accommodating employees with disabilities.

14. Employee Notification

The Corporation of the Town of Orangeville shall inform its employees of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability for the two situations below:

- i. As required to new employees as soon as practicable after they begin their employment;
- ii. Whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

15. Accessible Formats

In addition and where an employee with a disability requests it, the Corporation of the Town of Orangeville will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for the three points below:

- i. Information that is needed in order to perform the employee's job;
- ii. Information that is generally available to employees in the workplace; and
- iii. Consult with the employee making the request in determining the suitability of an accessible format or communication support.

16. Individual Accommodation Plan (IAP)

The Corporation of the Town of Orangeville shall have in place a written process for the developing a documented individual accommodation plan for employees with a disability. Process to include the twelve points below:

- i. The employee's participation in the development of the IAP;
- ii. Assessment on an individual basis;
- iii. Identification of accommodations to be provided;
- iv. Timelines for the provision of accommodations;
- v. The Corporation of the Town of Orangeville may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation:
- vi. Employee may request the participation of a representative from their bargaining agent, where represented, or otherwise a representative from the workplace not a from a bargaining agent;
- vii. Steps taken to protect the privacy of the employee's personal information;
- viii. Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- ix. If denied, the reasons for denial are to be provided to the employee;
- x. A format that takes into account the employee's disability needs;
- xi. If requested, any information regarding accessible formats and communication supports provided;
- xii. Identification of any other accommodation that is to be provided.

17. Return to Work

The Corporation of the Town of Orangeville will have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes must be documented and must outline the steps that the Corporation of the Town of Orangeville will take to facilitate the return to work and include an individual accommodation plan.

18. Performance Management, Career Development and Advancement and Redeployment

The Corporation of the Town of Orangeville will take into account the accommodation needs and/or individual accommodation plans of employees for the three points below when:

- i. Using performance management processes;
- ii. Providing career development and advancement information;
- iii. Using redeployment procedures.

19. Workplace Emergency Response Information

The Corporation of the Town of Orangeville shall provide individualized workplace emergency response information to employees who have a disability for the four points below:

- i. If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability;
- ii. If the employee who receives an individual workplace emergency response information requires assistance and with the employee's consent, the Corporation of the Town of Orangeville shall provide the workplace emergency information to the person designated by the Corporation of the Town of Orangeville to provide assistance to the employee;
- iii. As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;
- iv. Review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when the employer reviews its general emergency response policies.

20. Transportation Standard

The Transportation Standard will make it easier for people to travel in Ontario, including persons with disabilities, older Ontarians and families traveling with children in strollers.

The Corporation of the Town of Orangeville is committed to providing accessible transit services through conventional transit, in accordance with the Integrated Accessibility

Standards (Ontario Regulation 191/11) under the AODA and, in particular, Part IV, Transportation Standards, of such Regulation. This will be accomplished through the development and implementation of policies, practices, procedures, resources, equipment and training in the provisions outlined in the Integrated Accessibility Standards Regulation under the AODA. The Corporation of the Town of Orangeville has taken a proactive and inclusive approach to accessible transit. We have ensured that our conventional transportation services are accessible in advance of the new build requirements thereby eliminating the need for specialized transit services. For further clarification and specific details you can also refer to our 2013-2018 Accessibility Plan.

Accessibility Plans

The Corporation of the Town of Orangeville will include in their Multi-Year Accessibility plan the following four transportation related requirements:

- Provide public consultation annually with people with disabilities to participate and review the accessibility plan and provide an opportunity to provide feedback on conventional and specialized transit;
- ii. Progress for estimating the demand for specialized transportation services and to develop steps to reduce wait times;
- iii. Progress to meet the accessible taxi needs of our community;
- iv. Progress to increase the number of accessible bus stops/shelters.

Emergency and Public Safety Information

The Corporation of the Town of Orangeville shall establish, implement, maintain and document emergency preparedness and response policy for the safety of persons with disabilities and shall make those policies available to the public in an accessible format upon request.

Operator Responsibilities

The Corporation of the Town of Orangeville transit operators shall provide assistance to persons with disabilities, use lifting devices and assist persons with boarding and or providing route/destination information upon request of a person with a disability. Examples could be to assist customers by deploying lifting devices, ramps or portable bridge plates; ensuring adequate time is provided to person with disability to safely board, be secured and de-board or

provide information on route. Transit operators will also assist with safe and careful storage of mobility aids or assistive devices. Operators will allow people with disabilities to travel with a medical aid such as an assistive device, including respiratory and portable oxygen supplies.

Alternative Accessible Method of Transportation

Except where not practicable to do so, since the Corporation of the Town of Orangeville does not provide specialized transportation services, we shall ensure that any person with a disability who, because of his or her disability, is unable to use conventional transportation services is provided with an alternative accessible method of transportation.

Training

The Corporation of the Town of Orangeville will ensure that persons in our organization that provide passenger transportation services will receive accessibility training on the following seven subjects:

- i. Safe use of accessibility equipment and features;
- ii. Acceptable modifications to procedures in situations where temporary barriers exist or accessibility equipment on a vehicle fails;
- iii. Emergency preparedness and response procedures that provide for the safety of persons with disabilities;
- iv. Safe deploying of lifting devices, ramps or portable bridge plates;
- v. Safe boarding and de-boarding;
- vi. Providing and communicating information in accessible formats;
- vii. Safe storage of accessibility equipment and/or devices.

Availability of Accessibility Equipment and Features

The Corporation of the Town of Orangeville will ensure that we make available current information on accessibility related equipment and features of our conveyances, routes and services.

Maintenance of Equipment

We shall ensure that we establish, implement, maintain and document procedures to maintain accessibility related equipment is in good working order. We will also ensure operators report

any accessibility related equipment failure. If the accessibility equipment on a vehicle is not functioning, another vehicle with working accessibility features shall be dispatched.

Equal Fares and Fees

We will not charge a higher fee to a person with a disability than the fare that is normally charged for someone else who uses conventional transportation services. Nor will there be a higher rate for specialized services than that which is charged for conventional services. We will also ensure that we base a fare structure (e.g. for general passengers, students, seniors, people with disabilities) and the same fare options (e.g. tickets, tokens, passes) are available for people with disabilities to all conventional transit services. We will not charge a fare to a support person who is accompanying a person with a disability. It will be the responsibility of the person with a disability to demonstrate to the transportation service provider, their need for a support person to accompany them on the conventional transit.

Accessible Boarding/De-Boarding

Our operators of conventional buses will ensure that we allow persons with disabilities to enter or exit the vehicle at the closest available safe location that is not an official stop, if the official stop is not yet accessible or if there is a temporary barrier and the safe location is along the same route. The safe location will be determined by the operator and in consideration to the preference of the passenger with a disability. Our operators will report to our Public Works Information Line, 519-941-0440 (2250) any transit stops that are temporarily inaccessible or have a temporary barrier.

Storage of Assistive Devices

The Corporation of the Town of Orangeville will ensure operators transport assistive devices in the passenger compartment within reach of the passenger, if safe stowage is possible. If it is not deemed possible, the operator will stow assistive devices in the baggage compartment of the conveyance on which person is travelling. The operator will store, secure and return assistive devices in a manner that does not adversely affect the safety of any passenger and does not cause damage to the assistive device. No fee will be charged for storage of a mobility aid or assistive device.

Courtesy Seating

The Corporation of the Town of Orangeville provides priority seating according to the requirements of the legislation. The courtesy seating for persons with disabilities is located as close as practicable to the entrance door of the vehicle and shall be clearly marked with signage. The courtesy seating for persons with disabilities is signed to indicate that passengers, other than persons with disabilities, must vacate the courtesy seating if its use is required by a person with a disability.

Operators will ask passengers who are not using a transportable mobility aid device to vacate wheelchair securement locations, if that securement location is needed by a person using a transportable mobility aid device.

Service Disruptions

When there is a disruption to a scheduled conventional transportation service we will make available alternate accessible arrangements to transfer passengers with disabilities to their route destination. This will be communicated in a manner that takes into account the person's disability.

Pre-Boarding Route or Destination Announcements and On-Board Announcements

Conventional transportation operators will ensure that there are pre-boarding verbal announcement or by electronic means, of the route, direction, destination or next major stop, upon request.

We will ensure that there are verbal announcements of all destination points or stops on its busses while the vehicle is on route or while the vehicle is being operated.

In six years from the enactment, January 1, 2017, we shall ensure that, for conventional transportation services that do not require pre-booking, all destination points or stops are announced with the following three considerations:

- i. Announcements through electronic means;
- ii. Legibly and visually displayed through electronic means;
- iii. Visual displays of stop information will conform to the Route and Destination Signage requirements.

Requirements of New Buses – Manufactured after January 1, 2013

Grab Bars

Conventional transportation vehicles manufactured after January 1, 2013, shall be equipped with grab bars, handholds, handrails or stanchions that are provides where appropriate at the following four places:

- i. locations where passengers are required to pay fares;
- ii. each mobility aid securement position;
- iii. each courtesy seating area intended for use by persons with disabilities;
- iv. each side of any entrance or exit used by persons with disabilities.

We shall ensure that every newly designed conventional transportation vehicles comply with the following list of seven items:

- i. The grab bars, handholds, handrails or stanchions located at an entrance or exit used by a person with a disability shall be accessible from ground level and shall be mounted so that they are inside the vehicle when the doors are closed;
- ii. The location of grab bars, handholds, handrails or stanchions shall be distributed, as appropriate to the vehicle's design, throughout the vehicle to support independent and safe boarding, on-board circulation, seating and standing assistance and de-boarding for persons with disabilities;
- iii. Grab bars, handholds, handrails or stanchions shall not interfere with the turning and maneuvering space required for mobility aids to reach the allocated space from the entrance;
- iv. Grab bars, handholds, handrails or stanchions shall be high colour-contrasted with their background to assist with visual recognition;
- v. Every grab bar, handhold, handrail or stanchion shall, be sturdy, rounded and free of any sharp or abrasive element, have an exterior diameter that permits easy grasping by the full range of passengers and sufficient clearance from the surface to which it is attached, be designed to prevent catching or snagging of clothes or personal items, and have a slip resistant surface;
- vi. Where grab bars, handholds, handrails or stanchions return to a wall or floor, they shall be in a smooth curve. Brackets, clamps, screw heads or other fasteners used on grab bars,

handholds, handrails or stanchions shall be rounded or flush with the surface and free from burrs or rough edges.

Floor Surfaces

Conventional transportation vehicles manufactured after January 1, 2013, shall have floors that produce a minimal glare, are slip resistant and any carpeted surfaces shall have a low, firm and level pile or loop and be securely fastened.

Allocated Mobility Aid Spaces

Conventional transportation vehicles manufactured after January 1, 2013, shall have two or more allocated mobility aid spaces, with each space being a minimum of 1220 millimetres by 685 millimetres for vehicles designed to have a seating capacity of 24 passengers or less, and 1220 millimetres by 760 millimetres for vehicles designed to have a seating capacity of more than 24 passengers; and are equipped, as appropriate, with securement devices.

Spaces on transportation vehicles that are allocated as mobility aid spaces may be used for other passenger purposes, if not required for use by a person with a disability who uses a mobility aid.

Stop Requests and Emergency Response Controls.

Conventional transportation vehicles manufactured after January 1, 2013, shall be equipped with accessible stop-requests and emergency response controls located through the vehicle, including spaces within reach of allocated mobility aid spaces and courtesy seating locations.

Accessible stops requests and emergency response controls must meet the following five standards:

- i. Auditory and visual indications that the request has been made;
- ii. Mounted no higher than 1,220 mm and now lower than 380 mm above the floor;
- iii. Operable with one hand and not requiring tight grasping, pinching, or twisting of the wrist;
- iv. High colour-contrasted with equipment to which control is mounted;
- v. Tactile information on emergency response controls.

Lighting and Colour Contrast

Conventional transportation vehicles manufactured after January 1, 2013, shall be equipped with lights above or beside each passenger access door that are constantly lit when the door is open and that illuminates the lifting device, ramp, portable bridge plate or step nosings.

The light above or beside each passenger access door must when the door is open, illuminate the ground surface for a distance of at least 0.9 meters perpendicular to the bottom step tread or lift outer edge, and be shielded to protect the eyes of entering and exiting passengers.

Signage

On a go-forward basis, the Corporation of the Town of Orangeville shall ensure that transportation vehicles manufactured on or before January 1, 2013, shall have a legible display of the route or direction, or the destination or next major stop. Signage may include pictographs or symbols and shall adhere to the four listed points:

- i. Visible to the boarding point;
- ii. Consistently located;
- iii. Have a glare-free surface;
- iv. Positioned to avoid shadow areas and glare.

Signage, including electronic display monitors shall be consistently shaped, coloured and positioned with text that is high contrasted with its background and achieves appearance of solid characters.

Lifting Devices

Conventional transportation vehicles manufactured after January 1, 2013, shall be equipped with lifting devices, ramps or portable bridge plates and that each of them meets the requirements of the regulation as per the following three points:

- i. colour strip that runs its full width marking the bottom edge and that is high colour contrast with its background to assist visual recognition;
- ii. slip resistant platform surface;
- iii. raised edges of sufficient height to prevent a mobility aid from rolling off the edge of the ramp during boarding or de-boarding of passengers.

Steps

Conventional transportation vehicles manufactured after January 1, 2013, we will ensure that vehicles are equipped with steps and that the steps meet the following three requirements:

- top outer edge of each step is marked by a colour strip that has high colour contrast with background, runs full width of the leading edge of step, excluding any side edge moldings, and can be viewed from both directions;
- ii. have surfaces that are slip resistant and produce minimal glare;
- iii. have uniform, closed riser heights and tread depths, subject to structural limitations of vehicle.

Indicators or Alarms

For conventional transportation vehicles manufactured after January 1, 2013, the Corporation of the Town of Orangeville shall ensure that where vehicles have a ramp, lifting device or a kneeling function, each is equipped with a visual amber warning lamp indicator that is mounted on the exterior near the accessible entrance door and with an audible warning alarm. The visual warning lamp indicator and the audible warning alarm shall function when the kneeling function, ramp or lifting device is in motion. If the lifting device is being manually operated the warning light or alarm is not required. We will also provide an opening and closing visual indicator and audible alarm system.

21. Duties of Municipalities - Bus Stops and Accessible Taxi Requirements

The Corporation of the Town of Orangeville will provide the five points below specifically related to Municipalities:

- i. Consult with the municipal accessibility advisory committee, the public and persons with disabilities in development of accessible design criteria in the construction, renovation, or replacement of bus stops/shelters, including steps to meet the goal of accessible stops/shelters;
- ii. Consult with AAC, persons with disabilities and the public to determine proportion of accessible taxicabs required in the community, including steps to meet the need;
- iii. Ensure taxicabs do not charge a higher fare or additional fee to persons with disabilities;
- iv. Ensure taxicabs do not charge a fee for storage of assistive devices;

v. Ensure taxicabs have appropriate information displayed both the rear bumper and available in an accessible format to passengers.

The Corporation of the Town of Orangeville's Accessibility Plan will include progress made by the municipality to meet the accessible taxi needs of the community and provide accessible bus stops and shelters. For further clarification and specific details you can also refer to our 2013-2018 Accessibility Plan.

22. Public Spaces

The Corporation of the Town of Orangeville shall incorporate accessibility into public spaces that are newly constructed or redeveloped on and after January 1, 2016. We will ensure that we follow the existing requirements stated under the Design of Public Spaces Standards (Accessibility Standards for the Built Environment) for recreational trails and beach access routes, outdoor public use eating areas, outdoor play spaces, exterior paths of travel, accessible parking, and service related elements. When developing recreational trails we shall consult with the public and persons with disabilities. We shall also provide maintenance and restoration of public spaces by ensuring our multi-year accessibility plan includes procedures for preventative and emergency maintenance of accessible elements in publics spaces and procedures for dealing with temporary disruptions when accessible elements required under this section are not in working order. Being a public sector organization, accessibility reports shall be provided every two years. For further clarification and specific details you can also refer to our 2013-2018 Accessibility Plan.

22. Regulatory Requirements

An Administrative Monetary Penalties scheme is being established under the AODA (Accessibility for Ontarians with Disabilities Act). The scheme will allow a director or a designate to issue an order against a person, organization or corporation to pay a penalty amount as a result of non-compliance with the AODA or the accessibility standards. The largest penalty amount that can be issued to an individual or an organization that is not a corporation is \$50,000.

Use of administrative monetary penalties will be considered an avenue of last resort when all other compliance assistance and improvement options have been exhausted

The License Appeal Tribunal (LAT) will hear appeals from organizations of director's orders,
but not individual complaints. Individuals who feel their human rights have not been met would
continue to complain to the Ontario Human Rights Commission.