

Identifying an Accessibility Strategy for the City of Brampton



Accessibility for Life

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Executive Summary

Statistics Canada indicates that one in seven Ontarians have a disability (Government of Ontario, n.d.). Persons with disabilities across Canada face challenges accessing the built environment, services and technology within the communities they work, live and play. Facilitating an accessible and inclusive community must be supported and encouraged at the local level – this means that municipal governments play a strong and imperative role in setting the standards for an accessible society (Government of Ontario, 2020). Accessibility is the bridge between laudable goals and meaningful results (Government of Canada, 2013, para. 2). This is important to local governments because:

- Inclusive and accessible neighborhoods promote growth
- Inclusive and accessible recreation encourages participation and active lifestyles
- Inclusive and accessible businesses stimulate the economy and increase consumer participation
- Inclusive and accessible facilities allow individuals of all abilities to access amenities and services
- Inclusive and accessible employers result in accessing an untapped workforce and gaining enhanced perspectives
- Inclusive and accessible programs allow all community members to support and enjoy the activities offered within the municipality
- Inclusive and accessible communities make residents feel respected, valued and appreciated

The City of Brampton has actively incorporated accessibility into its municipal programs over the past decade through the development of its Accessibility Technical Standards, internal Standards of Practices (SOP's) and hands-on training activities. The goal is to ensure that City residents of all abilities can exist, thrive and participate in all the City has to offer.

Throughout the years, many approaches have been taken to acknowledge and incorporate accessibility standards and practices into City programs and facilities to

work towards the achievement of Ontario's 2025 goal of an Accessible Ontario. During an internal review in 2020, and in preparation for a recent Accessibility for Ontarians with Disabilities Act audit, staff identified that although accessibility is incorporated into many aspects of the municipal operations, there is no consistent corporate strategy to align the various departmental responsibilities with accessibility requirements. This resulted in key components being overlooked, policies and procedures that are lacking or even non-existent, many processes that have not been provided to all departmental staff and discrepancies in how some of the approved practices and SOPs are being applied.

Development of a corporate Accessibility Strategy will enable the City to meet its objectives and goals in an efficient and responsible manner as it begins to implement its "2040 Vision" and create a more inclusive Brampton. In recognizing the need to develop a formal Accessibility Strategy, several business drivers have been identified that will require the City to shift its thinking, and enhance the accessibility framework to include new strategies, internal partnerships, communication and governance as its core elements.

The City's "Statement of Commitment to Accessibility": Recognizing that prevention of barriers, reducing and removing existing barriers and enhancing access to our goods, services and facilities is essential to providing increased opportunities that foster independence, inclusion and dignity for people of all ages and abilities (City of Brampton, 2015, p. 2).

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Listing of Acronyms

Acronym	Abbreviated Phrase
AAC	Accessibility Advisory Committee
AODA	Accessibility for Ontarians with Disabilities Act
IASR	Integrated Accessibility Standard Regulation
MAP	Municipal Accessibility Plan
OBC	Ontario Building Code
ODA	Ontarians with Disabilities Act
SOP	Standards of Practices
The Code	Ontario Human Rights Code

Scope and Methodology

The scope of this report is to understand the context of why the City of Brampton should incorporate accessibility as a core function, and how direction can be provided to ensure all departments are consistently and regularly adhering to the corporate mandate. This report will provide background information on legislative requirements, past and current practices, challenges to overcome, impacts to the City and a proposed direction. The report does not make comparisons of other municipal organizations or levels of government, nor how they have implemented direction within their organizations to meet the mandate of the Province's accessibility legislation. The report provides a high-level overview of accessibility in local government and a proposed plan to guide City decision-making and action to build an inclusive community.

Hyperlinks are included within the report for the convenience of the reader as reference material, to enhance further understanding if interested. All hyperlinks are listed in the appendices and are not required reading as part of the report itself but rather are supplementary.

Methodology used in creating this report includes research related to Federal and Provincial legislative responsibilities, podcasts, industry standards, City resources, best practices, statistics, journal articles and accessibility advocate webpages. Data collected includes excerpts from applicable legislation and standards, policies and procedures from other municipalities, statistics, advocacy reports, historical data, business cases, industry opinions and government program information.

Body of Report

Section 1: Background

A. History of the Accessibility for Ontarians with Disabilities Act (AODA)

The Ontarians with Disabilities Act (ODA) was enacted in 2001 to regulate provincial government and specific public sector organizations in relation to establishing annual accessibility plans and accessibility advisory committees (for populations over 10,000) as well as imposing specific obligations for accessible barrier-free design guidelines, websites, goods and services purchases, employee accommodation and capital projects.

In consideration of the limited scope of the ODA, the Province of Ontario enacted new legislation in 2005 designed to provide a stronger and more wide-ranging legislation (Government of Ontario, 2019, p. 6) to create an Ontario that is fully accessible for people with disabilities, and to improve accessibility standards for Ontarians with disabilities to all public establishments by 2025. This Act, along with additional regulations, introduced over the years, outlines legislative requirements for the Ontario government and other designated public and private sector organizations in the provision of accessible standards, spaces and access to services; this includes mandated timelines to meet the requirements (Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11).

The Ontario Human Rights Code (The Code) works together with the AODA to promote equality and accessibility, and further governs the mandate of accessibility. The Code prohibits discrimination based on disability and mandates that individuals with disabilities have the right to equal treatment in accessing housing, employment, goods, services and facilities (Ontario Human Rights Commission, 2013, p.8). Failure to provide individuals with disabilities with equal access to a facility or equal treatment in a service would constitute discrimination under The Code and can be subject to a human rights complaint (Ontario Human Rights Commission, 2013, p. 4). The AODA complements and works in conjunction with The Code to ensure individuals are free from discrimination based on abilities.

The Ontario Building Code (OBC) continues to regulate minimum accessibility standards for buildings and further supplements the intent of the AODA.

In 2008, the government introduced the first standard, Customer Service, which required organizations to “develop, implement and maintain policies for serving people with disabilities that are consistent with the principles of dignity and independence, integration, equal opportunity and communication that takes disability into account” (Government of Ontario, 2019, p. 9). In July 2011, the Province of Ontario enacted the Integrated Accessibility Standard Regulation (IASR) to address standards for employment, information and transportation; further amendments introduced additional standards related to design of public spaces and incorporated the existing customer service standard (O. Reg. 191/11). The legislation streamlines and aligns the phase-in of the accessibility requirements in each of the areas of standard development and will incorporate the requirements of future accessibility standards. Municipalities are now required to provide a bi-annual report on measures taken to implement the accessibility strategy; and prepare and maintain a multi-year accessibility plan to prevent and remove barriers that is reviewed and updated at least once every 5 years. The standards continue to require municipalities to establish an Accessibility Advisory Committee consisting of members of the public who identify as having a disability to provide consultation and feedback on the municipality’s accessibility program.

B. Brampton’s Accessibility Technical Standards

In 2005, with assistance from the City of Brampton Ontarians with Disabilities Act Staff Committee and Technical Sub-Committee, the City adopted its own [Accessibility Technical Standards](#) to work alongside and complement the ODA and OBC requirements. These technical standards are used across City departments to promote access to City facilities for individuals of all abilities.

The City of Brampton Accessibility Technical Standards were developed to respond to the design, development and construction of new facilities and exterior public spaces, as well as the retrofit and renovation of existing facilities and public spaces that the City owns, operates or leases (City of Brampton, 2015, p. 9). The Technical

Standards, although developed with an emphasis for individuals with disabilities, are used to address the needs of people of all ages and abilities. Utilization of universal design components helps focus on the broad diversity required to address the types of individuals who access facilities. The philosophy of universal design is structured around seven design principles (Connell et. al, 1997):

- Equitable Use
- Flexibility in Use
- Simple and Intuitive Use
- Perceptible Information
- Tolerance for Error
- Low Physical Effort
- Size and Space for Approach and Use

The City's statement of commitment to accessibility, approved by Council in 2012, solidifies the commitment that the City continues to make to ensure an accessible Brampton.

C. Vision 2040

The City adopted [Vision 2040 – Living the Mosaic](#) in 2018 as an inspirational document to guide the development of Brampton in future years as a connected, inclusive and innovative City. Developing Vision 2040 included intensive, community-wide conversation involving collecting thoughts and ideas from staff, citizens and business owners of all ages, abilities, backgrounds and experiences. The "Vision" is a guiding document for developing the current City Council priority projects defined as the "Term of Council Priorities", along with multi-year and annual budget processes.

Vision 2040 encompasses seven target vision statements and five lenses for maximum success in guiding the implementation of change.

VISION 1	VISION 2	VISION 3	VISION 4	VISION 5	VISION 6	VISION 7
Sustainable & "green" communities	Quality jobs, activities & integrated living	Complete neighbourhoods	Safe, integrated & innovative transportation	Mosaic of cultures with social responsibility & respect	Healthy citizens: physical mental wellness, fitness & sports	Mosaic of artistic expression & production

LENS 1	LENS 2	LENS 3	LENS 4	LENS 5
Public Engagement	Collaboration	Design	Technology	Identity

Ensuring inclusion and access to individuals of all abilities and ages is a cornerstone in achieving all aspects of Vision 2040.

D. Term of Council Priorities: 2018-2022

Brampton City Council identified 22 initiatives in the 2018 – 2022 Term of Council priorities organized into five priority directions: Opportunities, Mosaic, Green, Healthy & Safe and Well-run. Although accessibility has a place in all the priorities, it is firmly embedded in the "Brampton is a Mosaic" category. This direction strives to "celebrate Brampton's diversity by more effectively engaging and communicating with diverse groups, supporting cultural events, and developing a holistic framework to embed diversity across the city" (City of Brampton, 2020). The goal of being "A Mosaic" encompasses the following factors (City of Brampton, 2020):

- Embedding diversity, equity and inclusion into City initiatives, services, and programs
- Providing innovative engagement to proactively encourage civic participation by a diverse range of community stakeholders and residents
- Creating spaces that incorporate universal design to increase accessibility, generate a sense of belonging for all and encourage participation for individuals of all ages and abilities

Accessibility is a basic human right and a foundational goal of achieving that mosaic.

E. Municipal Accessibility Plan (MAP) 2019-2025

Since December 2012, staff have presented Council with the required multi-year MAP that outlines initiatives planned over a 5-year period to ensure the City's compliance with the IASR (O Reg 191/11). The MAP outlines how the City will continue to remove barriers and improve accessibility for persons with disabilities, and it builds upon the accomplishments of the previous accessibility plans. Regular updates are reviewed with the Accessibility Advisory Committee (AAC) and the required Compliance Reports submitted to the Province of Ontario. The current [MAP](#), approved in December 2019, can be found on the City's website. It reports on some of the general accomplishments of the City over the past few years and outlines projects proposed for 2020 and 2021. The next MAP deadline is December 2021.

F. Accessibility Challenges

Meeting accessibility goals is not simply about developing written policies and practices related to accessibility with an expectation that this will simply evolve, but rather incorporating the belief that everything the City does should be equitable for individuals of all abilities. Putting this into everyday practices comes with many challenges including:

1. **Compliance with governmental industry regulations:** While the AODA, The Code and the OBC provide legislative guidelines, the interpretation and enforcement of the legislation can be a daunting process and does not seem to be applied consistently across all organizations or levels of government. The inconsistency of approaches and application across Ontario creates challenges in gathering proper benchmarking data to gain perspectives on how accessible communities truly are. Disconnect also occurs in the regulatory body with discordances determining who is ultimately

responsible for enforcing compliance with the various pieces of legislation.

2. **Leadership:** The City 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. The success of the City's accessibility program is contingent on its leaders serving as role models and highlighting that the City serves individuals of all ages and abilities.
3. **Fiscal Austerity:** Good governance demands that local government be fiscally responsible while meeting the needs of the community. Balancing City priorities, budget constraints and resident wants while incorporating accessibility into both the decision-making process and project implementation will require innovative and courageous policy choices.
4. **Resources:** In order to implement an efficient accessibility program, adequate financial and non-financial resources are required including budget, staff, technology, supplies and communication channels. Efficient and consistent allocation of resources on an annual basis will help to achieve desired results.
5. **Staff buy-in:** Achieving awareness and participation of City staff within all City departments in an organization of 6,000 employees spread across numerous locations and facilities throughout the City will be an enormous challenge. Keeping staff informed, educated and accountable in their responsibility to ensure all services, programs and facilities continue to be accessible to all will require continuous reinforcement and engagement. This will require a comprehensive "game plan" and a strong commitment to implement and maintain. Information continuity will be required to ensure new staff and staff who experience role changes are provided the tools required to remain invested and successful in fulfilling their accessibility responsibilities.
6. **Demographic Changes:** The City of Brampton is a young City, with a population of 656,000 (Census, 2016) and growing annually. As of 2018, the

average age of Brampton citizens was 36.5. According to the 2017 Canadian Survey on Disability, one in five Canadians aged 15 and over (22% of the population) identify as having a disability, and it is expected actual numbers are likely higher (Stuart Morris, 2018). As Canada's population grows older, millions of Canadians find themselves worrying about decreased mobility, vision and hearing and the impact it may have on their own lives or the lives of loved ones (Angus Reid Institute, 2019, para 1). Statistics also indicate that the prevalence of disabilities increases with age (Stuart Morris, 2018), and as the population ages many individuals start to consider the impacts of accessibility. As the community grows, the City must ensure its infrastructure and services will be able to meet the needs of the changing and aging population.

7. Technology Changes: The past decade has seen a significant change in how individuals access services and programs, as technology has become more innovative and flexible allowing people to do more without physically accessing locations. The City strives not only to keep up with technological advancements in both the built and digital environment but also to ensure technologies address various accessibility needs. Sometimes implementing new technologies can be slow due to legislative restrictions, budget constraints and competing priorities. The COVID-19 pandemic quickly highlighted these inadequacies and forced the City to re-evaluate the need to prioritize technology for residents' ability to access services and programs.

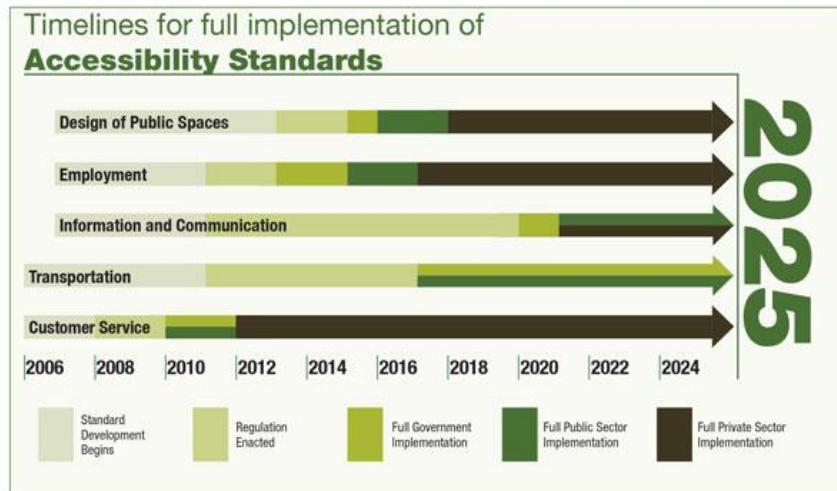
G. Accessibility Business Drivers

In response to addressing these challenges, a number of business-driven requirements have been identified that need to be addressed and/or supported through an accessibility strategy.

1. The public consultation resulting from the 2040 Vision realigned the City's efforts in creating a participatory model of management where citizens are engaged, diversity and inclusion are encouraged, collaborative environments are fostered, and the City is more output oriented. More and more agencies are completing public consultations to determine the impacts resulting from

less accessible communities; reports from organizations such as the Conference Board of Canada, have calculated the effects of providing increased accessible physical spaces, and how it would benefit both the workforce and consumer spending, ultimately resulting in positive effects on the overall economy (Canada, 2018). It is important that the City understands resident expectations around accessibility and inclusion and the potential impacts of meeting those expectations.

2. The Province's goal to achieve a fully accessible Ontario by 2025 has created strict timelines for municipalities to achieve various accessibility milestones. The City must comply with these milestones to avoid regulatory penalties, fines and damage to its reputation.



(Government of Ontario, 2020)

3. Industry standards are beginning to require more accessible practices through architectural designs, certification programs such as the [Rick Hansen Foundation Accessibility Certification Standards](#), sport programs, transportation requirements, communication tools, enhanced recognition symbols such as the new Dynamic Symbol of Access (image below), increased proclaimed accessibility awareness days and post-secondary educational program certifications.



4. Labour shortages and demographic changes require improved and innovative recruitment and retention practices that ensure an inclusive population represents the City employment base. Employment is “viewed as a key indicator of inclusion in society, providing individuals with a sense of fulfillment and purpose” (Morris et. al, 2018, p. 11). Because persons with disabilities are less likely to be employed, the “United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), which Canada ratified in 2010, calls for recognition of “the right of persons with disabilities to work, on an equal basis with others”, by providing a work environment that is “inclusive and accessible to persons with disabilities” (Morris et. al, 2018, p. 11). Tapping into under-utilized demographics and ensuring the workplace is accessible for individuals of all abilities will create equal opportunity, innovative work strategies and build stronger employee engagement.
5. Public scrutiny is at an all high time in an era of instant access to information, social media and political scrutiny. Governments, now more than ever, need to be transparent, inclusive and open to all citizens missteps tend to be posted instantly online and circulate at warp speed. Allegations of discrimination, human rights violations and exclusion can cause irreparable harm to the corporate image and public trust.

Section 2: City of Brampton’s Current Accessibility Program

A. Role of Accessibility Function

The role of the City’s Accessibility function is to strategize, plan and execute the City’s accessibility program through:

- Consultation on the development and retrofit of all interior and exterior City facilities and amenities
- Development and delivery of training programs
- Organization of special accessibility events and awards
- Support to the Accessibility Advisory Committee

- Preparation of accessibility plans and compliance reports

The Team currently consists of two full-time staff who report to a Manager that oversees the program. They are actively involved in many of the City's built environment processes and provide regular reviews and feedback related to site plan, capital plans and parks and trails. The Team consults with Transit and Public Works 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 spaces to be accessible for all. They provide feedback with an accessible lens on communication tools (posters, signage, advertising, etc.), 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 Accessibility Service Card, which is a digital storage site for City staff to access internal service information. Although the Team continues to be an effective resource, it is a challenge with limited staff resources to properly review and evaluate all department activities and locations.

City departments are ultimately responsible for maintaining accessibility standards for their specific business units in consultation with the Accessibility staff. The Accessibility Team has not been delegated the authority for enforcement or audit, and it is preferred that they collaborate with business partners on accessibility matters rather than direct them in how to operate their business units. 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.

In the absence of a formal corporate Accessibility Strategy, accessibility programs within the various City departments are based on staff interpretation and consultation typically on a case-by-case basis. This results in inconsistent application across different service areas. It has become clear that there is a need for improvements to how the City addresses accessibility, including enhanced

formalized policies and practices, rollout of mandatory training, better communications, comprehensive information and educational provisions all with a broader scope of alignment with departmental operations.

B. Vision

Organizations can experience a “silo mentality” which results in lack of information sharing and business alignment; utilizing a unified vision can result in understanding and buy-in of the organizations long-term goals, department objectives and key initiatives (Gleeson, 2013). The City of Brampton’s vision links its strategic priorities with the need to provide accessible and inclusive communities where people can work, live and play. Offering exceptional municipal and customer services that are fair and equitable to individuals of all abilities is a foundation of this vision. A corporate Accessibility Strategy must consist of clearly defined goals and objectives that align with the City’s vision, an understanding of the regulatory environment that the City needs to operate in, and the rules that will allow an accessibility program to operate successfully. It should build on the City’s [“Statement of Commitment to Accessibility”](#) (City of Brampton, 2015, p. 2).

The Strategy will be comprised of several core elements including: framework, people, governance, resources, communications and performance measures. The goal is to identify, remove and reduce barriers that keep people with disabilities from fully participating in activities such as employment, shopping, recreational activities and accessing services and goods.

C. Regulatory Environment

Accessibility is governed through the following Provincial legislation, which inform municipal policy goals and objectives:

- Ontario Human Rights Code
- Accessibility for Ontarians with Disabilities Act, 2005 (AODA)
- Integrated Accessibility Standards Regulation 191/11 (IASR)
- Ontario Building Code O Reg. 332/12 (OBC)

By knowing and understanding the regulatory environment, the City will be prepared to identify its responsibilities and associated risks if those responsibilities are not met, which in turn will allow effective decision-making to mitigate those risks, or make informed decisions to accept the risk. It will also provide a minimum standard for which the City must meet. By complying with the regulatory environment, the City will realize the benefits of meeting Bramptonians' expectations around accessibility and inclusion.

D. Policy

Through understanding of the regulatory environment, the City can identify and develop policies, directives and SOPs, which provide guidance on how to incorporate accessibility into City services, programs and facilities. Policies are the foundation of good governance to promote a consistent and transparent approach to removing and reducing barriers. Currently, the City has the following governing documents in place:

- [Inclusive Customer Service Policy 14.12.1](#)
- [Workplace Accommodation Policy 2.12.0](#)
- [Recruiting and Retaining Top Talent Policy HRM-160](#)
- [Accessibility Technical Standards](#)
- Alternate Format SOP
- Accessible Meetings SOP

Although these policies and SOPs meet minimum legislative requirements, they have been pieced together over the years to meet the legislation of the day and do not necessarily incorporate best practices and enhanced measures to ensure persons with disabilities can access all City services. There has also been evidence that many staff across the organization are not even aware of the policies or applicable SOPs.

E. Budget 2021

The City's [2021 Budget](#) strives to strengthen the City's future growth, connectivity and sustainability by funding projects related to:

- Maintaining existing services, enhancing infrastructure and creating a safer, vibrant city
- Investment attraction, talent building and job creation
- Improving sports fields, trails and playgrounds
- Recovery and adjustment efforts from the impacts of the COVID-19 health pandemic throughout 2020

The Accessibility function continues to operate with a small general budget for an annual awards event, basic training programs and staff expenses. As each department is responsible for meeting accessibility requirements, it is assumed that they have budgeted accordingly, however, without a strategy to guide these decisions, this cannot be confirmed.

Section 3: Core Elements of a Corporate Accessibility Strategy

A. Framework

The framework involves identifying and aligning accessibility needs with departmental goals into an overarching corporate roadmap. The intent of the roadmap would be not only to meet minimum accessibility legislative requirements but to also enhance and exceed acceptable standards where feasible. The roadmap would define the goals and outcomes, roles and responsibilities, proposed milestones and a robust change management plan (AMCTO, 2019: *Building Business Cases*).

A strategic communications plan for employees, as well as citizens, would form part of the roadmap. Planned review periods would be included to determine organizational alignment and capacity. The overall framework would require senior leadership sponsorship and Council support.

B. People

The Strategy needs to take into consideration several internal and external stakeholders, including the Accessibility Team, departmental staff, elected officials, senior management, volunteers, other levels of Government, risk management team, the AAC, other Advisory Board members, citizens, etc. Through

collaboration, the City will identify a group of Accessibility Champions, internally and externally, to be responsible for information sharing, consultation and compliance of accessibility requirements across the City.

Internal: By delegating responsibilities, resources and accountability to dedicated staff representing key Divisional areas, and establishing a corporate working body to oversee the implementation and adherence to accessibility standards and practices, the City will gain a stronger perspective on being able to serve a community of all abilities. A provision of resources to facilitate implementation of accessible features, accompanied by robust training programs, will increase staff awareness and involvement. Engagement and involvement of elected officials in directing the Strategy, evaluating performance measures and informing the public of key milestones will support the program and ensure the social, economical and cultural benefits of incorporating accessibility are maximized (AMCTO, 2019: *Public Consultation and Citizen Engagement*).

External: Public stakeholder input and engagement is an important part of a strategy. Engaging the AAC through greater consultation will not only meet the City's legislative responsibility but will also provide a broader lens from external stakeholders offering a range of experiences. Increased involvement will facilitate their investment in the City, strengthening citizen participation and building trust in government responsiveness (AMCTO, 2019: *Public Consultation and Citizen Engagement*). Further, creating a network of individuals from communities within Brampton with an array of disabilities who can provide experiential input on the accessibility of City facilities, services and programs will be an invaluable tool to provide feedback and measure the success of our efforts. This network would complement the work of the AAC and add an additional resource for consultation purposes.

Steps that include greater consultation with the AAC and creation of a network of individuals will broaden corporate awareness and public dialogue to

- reduce and remove barriers,
- support inclusive employee and community engagement,
- promote increased compliance with accessibility legislation,

- create more accessible spaces and equitable access to services, and
- build public support and trust in local government and the elected representatives.

C. Governance

Review of existing municipal accessibility policies, procedures, and the statement of commitment to determine validity, timeliness and alignment with current legislation and City practices will be essential. Creating a comprehensive and overarching accessibility policy that provides formal direction and general guidelines for all City employees, supported by detailed and specific SOPs, will align service areas and create a consistent approach of intended direction to guide present and future decisions and actions (AMCTO, 2019: *Policy Formulation, Implementation & Evaluation*). Designating regular policy review periods within a two to three year cycle will keep information up-to-date and fluid. Engaging in a detailed review and alignment of the City's current Technical Standards with the expected OBC revisions in 2021, will ensure the City is keeping current on minimum built design requirements and construction practices that will allow enhanced accommodating measures to be encouraged when applying the Technical Standards.

D. Resources

Currently the Accessibility Function 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; however, the resources are not explicitly designated for accessibility.

The City must recognize appropriate resources to implement a corporate accessibility strategy. Resources come in the form of:

- Human resources: staff, volunteers and elected officials
- Physical resources: technology, supplies, communication tools and infrastructure

- Financial resources: adequate budget allocation for staffing, training, programs, services, park and trail development, facility construction and retrofits, repairs and maintenance
- Time Factor: staff must allocate dedicated time to complete reviews and research to assess progress in achieving accessibility in departmental activities and projects. Projects must include time allocated to address accessibility needs and ensure they are fully accessible

Council must be prepared to provide sufficient budget allocation based on concrete and justifiable project budgets, forecasting and variance reporting and understand that financial resources may change from year to year depending on the type and number of projects completed. A defined process and use of metrics will assist in determining how to appropriately budget for accessibility requirements through one or more of the following processes:

- Allocation of a percentage of the annual City budget for accessibility staffing, programs and projects
- Establishing a reserve fund to be drawn upon for specific needs
- Setting a viable annual budget for the Accessibility Function based on justifiable metrics
- Allocating specific annual funding to each department designated to meeting accessibility needs and legislative requirements

E. Communications Strategy

Building an effective communications strategy can play a key role in shaping the perception and experience of the target audience. It will be important to develop a communications plan to formally define what and how the information will be provided, whom specific information should be given to, when information should be delivered and what communication channels will be used to deliver the information. This is a vital component in meeting objectives, defining responsibilities, promoting awareness, meeting timelines and reinforcing commitments. Failure to communicate effectively can create confusion, disconnect, frustration and impact the effectiveness of the program. Accessibility is more than just a legal standard or specification—it involves fostering a sense of inclusion so people with disabilities can flourish

(Gibbard et. al, 2018, p. 5). A key message must identify a change in focus of our cultural perspective from the term disability to one of ability, and the messaging must target the different audiences, both internally and externally.

F. Performance Measurement

Performance measures will evaluate the impact of the Strategy. The measures will need to be developed so they can be used to set performance targets, establish resource allocation and utilization, strengthen accountability, monitor achievements, empower staff and improve relationships and customer service (internally and externally). The measures will be specific, measurable, achievable, relevant and trackable (S.M.A.R.T. measures) and will include both current results and performance (lagging measures) and desired results (leading measures) (AMCTO, 2019: *Corporate Performance Management and Service Improvement*). Each project will determine what performance measurement tool best evaluates its progress.

Performance measures are most effective when reviewed and analyzed at regular intervals in a consistent manner throughout the implementation of each project. This will provide accurate and defensible reporting information on the impacts, challenges and successes of the Strategy alignment with departmental goals. This data can be used to benchmark against other organizations and standards to evaluate the effectiveness of the Strategy in creating a truly accessible City.

Section 4: Implementation Strategy

A. Accessibility Business Case

Building a comprehensive Business Case will establish the foundation for implementation of the Strategy. To build credibility and support of the Strategy, the Business case must define the needs and benefits of the project, achievable goals, resources required and how the Strategy will support City Council's priorities.

The framework for the Business Case, as identified in the table below, takes into account goals and objectives, as well as the core elements of the strategy. The framework identifies the elements of the program that the City already has or will need to focus on in the coming months.

Identifying an Accessibility Strategy for the City of Brampton

	Need	Benefit	Achievable Goals/Outputs	Resources	Council Priority
Framework Linking strategic goals with accessibility	<ul style="list-style-type: none"> Elected Official and Executive sponsorship Vision, goals & objectives Plans & roadmap 	<ul style="list-style-type: none"> Supports diversity, equity & inclusion Promotes better public engagement 	<ul style="list-style-type: none"> Cross-functional roadmap Alignment with existing statement of commitment 	<ul style="list-style-type: none"> Leadership support 	<ul style="list-style-type: none"> Mosaic Well-run City Opportunities
People Internal & external individuals	<ul style="list-style-type: none"> Staff Senior Management Elected officials AAC Members Citizens Government 	<ul style="list-style-type: none"> Accessibility champions Expanded staff recruitment & retention Diversity & inclusion Community engagement 	<ul style="list-style-type: none"> Establishing a cross-dept. working group Community Engagement 	<ul style="list-style-type: none"> Staff Leadership Support Time Min. financial (advertising) 	<ul style="list-style-type: none"> Mosaic Opportunities
Governance Rules governing accessibility	<ul style="list-style-type: none"> Improved guiding documents Effective & achievable direction Awareness Compliance 	<ul style="list-style-type: none"> Alignment of procedures and services Confirmation of legislative changes Transparency Accountability 	<ul style="list-style-type: none"> Comprehensive policy SOP creation Updated Tech Standards Enhanced training Governing body 	<ul style="list-style-type: none"> Staff Leadership Support Communications Financial 	<ul style="list-style-type: none"> Well-run City
Resources Tools required to implement	<ul style="list-style-type: none"> Staff Project specific budget allocation Technology Communications 	<ul style="list-style-type: none"> Action Transparency Results 	<ul style="list-style-type: none"> Working group of existing staff Increased budgets Maximizing available in-house tools 	N/A	<ul style="list-style-type: none"> Well-run City
Communications	<ul style="list-style-type: none"> Comms Plan Staff Technology 	<ul style="list-style-type: none"> Awareness Transparency Record 	<ul style="list-style-type: none"> Create & execute plan 	<ul style="list-style-type: none"> Staff 	N/A
Performance measurements Measures of legislative requirements & community expectations are met	<ul style="list-style-type: none"> Key performance indicators (KPIs) Benchmark data Evaluation process 	<ul style="list-style-type: none"> Trackable Accountability Performance metrics & measures Measures results 	<ul style="list-style-type: none"> Staff awareness and adherence Service delivery review Data collection Setting KPIs Internal dashboard 	<ul style="list-style-type: none"> Staff Time Technology 	<ul style="list-style-type: none"> Mosaic Well-run City

B. 2021-2023 Tactical Plan

Short-term Goals: The project will focus on the following four short-term goals with an objective to implement in 2021 to support the development of an Accessibility Strategy:

1. Establishment of a cross-functional Accessibility Working Group who will be accountable to coordinate and facilitate the implementation, maintenance and

reporting on compliance with all applicable AODA-IASR, The Code, requirements as well as other departmental-specific accessibility legislation and municipal policies and practices. The working group will ultimately ensure City departments implement and follow the corporate Accessibility Strategy upon execution.

2. Formalization of the Business Case and the development of a cross-functional corporate roadmap (as described in Section 4.A).
3. Compilation of a comprehensive Accessibility Policy to include all required legislative and municipal regulations and to be further supported by applicable Standards of Procedures related to, but not limited to:
 - Accessibility Supports: assistive devices, guide dogs and support persons
 - Communication and Alternate Format
 - Customer Service
 - Inclusive Play Spaces
 - Meetings
 - Notice of Service Disruption
 - Events Planning
 - Training
 - Web Accessibility
 - Workplace Accommodation Process
4. Presentation of Accessibility Strategy to Council

Long-term Goals: Upon Council approval of the Accessibility Strategy, the following long-term goals will be executed throughout 2022 under direction of the Accessibility Working Group:

1. Communication Plan to deliver the Strategy across the organization
2. Development and monitoring of performance measures
3. Public consultation to determine effectiveness and community impacts of the Accessibility Strategy

Section 5: Expected Benefits

Having a corporate Accessibility Strategy will support Council's goal in making Brampton a great place to live, work and play. It will further reinforce the priority that Brampton is a "Mosaic" - engaging, communicating and imbedding inclusion, accessibility and diversity across the City. Having an accessible City provides more opportunities for all businesses, residents and communities. According to the Government of Ontario,

"Embracing the business case for accessibility is a win-win proposition for organizations of all sizes and for people with disabilities. The bottom line is that an accessible province means more opportunities for all Ontarians.

For Ontario's 1.8 million people with disabilities, it means being able to actively participate in our communities, workforce and economy.

For business, it means tapping into an underused talent pool, creating new products and services based on universal design, and harnessing the buying power of more people, both in-store and online.

For our economy, it means up to a \$600 a year per capita increase in the gross domestic product.

That makes becoming accessible and promoting accessibility not just the right thing to do, but also the smart thing to do for businesses and organizations of all sizes." (2020, *A Bold Vision*, para. 2-6).

The City will benefit from having a mechanism to drive decision-making in a way that embraces and incorporates accessibility at the start of any project, program, service or construction activity leading to reduced costs, improved community engagement and participation, strong corporate image, regulatory compliance, innovative design, increased economic opportunities and an expanded and improved workforce.

Conclusion

To realize the AODA's bold vision and make Ontario accessible by 2025, organizations must take steps to create lasting change that ensures people with disabilities are able to participate actively in society (Government of Ontario, 2020). Adapting business practices, policy development and decision-making to be inclusive and to imbed the perspective that every decision made should consider, include and mandate that programs, facilities, opportunities and services are available and accessible to individuals of all abilities is a basic human right.

Creating a comprehensive corporate Accessibility Strategy to provide guidance, direction and understanding to all City departments in the implementation of their responsibilities and functions will align departmental priorities and ensure a consistent approach across the City in addressing accessibility.

As Canadians, we all benefit from accessibility when we and our family members, friends, neighbours, classmates and co-workers are able to fully participate and contribute in our communities and workplaces without barriers (Government of Canada, 2020). Unfortunately, many barriers still exist in our communities and these limit the social, political and economic inclusion of persons with disabilities. A corporate Accessibility Strategy will provide the City of Brampton with the foundation to build inclusive communities that will promote increased community involvement, more access to municipal services, improved customer service, enhanced public engagement, economic opportunities, and broader awareness on the importance of recognizing access for all abilities.

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APPENDICES:

Appendix 1: [City of Brampton Accessibility Technical Standards](#)

Appendix 2: [City of Brampton 2040 Vision – Living the Mosaic](#)

Appendix 3: [Inclusive Customer Service Policy 14.12.1](#)

Appendix 4: [Municipal Accessibility Plan](#)

Appendix 5: [Recruiting and Retaining Top Talent Policy HRM-160](#)

Appendix 6: [Rick Hansen Foundation Accessibility Certification Handbook](#)

Appendix 7: [Workplace Accommodation Policy 2.12.0](#)

Appendix 8: Alternate Format SOP

Appendix 9: Accessible Meetings SOP