



**Elections
Ontario**

Integrated Accessibility Standards Policy

Office of the Chief Electoral Officer
Elections Ontario
September 2024

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Document History

Revision Number	Revision Date	Effective Date	Description of Changes	Approved By
1.0		January 1, 2012	Original	Greg Essensa, CEO
2.0	February 25, 2014	January 1, 2014	Document revisions: <ul style="list-style-type: none"> • Legislative/Regulatory - Reflects amendments to O.Reg.191/11: <ul style="list-style-type: none"> ◦ P.5, s.4, h) and j). ◦ P.6, s.7, Part I (A) IV. ◦ P.6, s.7, Part I (B) I. ◦ P.11, s.7, Part IV. ◦ P.12, s.7, Part V. • Content - updates policy to clarify and reflect updated interpretation: <ul style="list-style-type: none"> ◦ P.5, s.4, i). ◦ P.8, s.7, Part II (B) I f. ◦ P.8, s.7, Part II (D) I b &c. ◦ P.9, s.7, Part II (E) I. 	Greg Essensa, CEO
3.0	April 19, 2017	April 19, 2017	Document Revision: <ul style="list-style-type: none"> • Updated policy with information related to compliance for intranet and accessible formats • Simplified design of public spaces. • Removed reference to `Textbook and supplementary learning materials` as only applies to school boards. 	Greg Essensa, CEO
4.0	July 28, 2020	August 4, 2020	Updated the Policy and added Customer Service Standards.	Greg Essensa, CEO
4.1	August 2024	September 30, 2024	Amended to reflect governance changes	Greg Essensa, CEO

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Section 1: Introduction

Elections Ontario is a non-partisan agency of the Legislative Assembly of Ontario that administers provincial elections, by-elections and referenda while taking into consideration accessibility requirements for Ontarians with disabilities. As such, Elections Ontario is committed to meeting the accessibility standards stipulated in the *Election Act*, the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*, *Integrated Accessibility Standards Regulation (IASR)* and the *Ontario Human Rights Code*.

In providing the overall strategic direction for Elections Ontario's commitment to providing accessibility supports to Ontarians with disabilities, this policy addresses the mandatory requirements and standards under the IASR. The IASR establishes accessibility standards for information and communications, employment, transportation, design of public spaces and customer service.

Additionally, this policy also addresses the specific requirements of the AODA which broaden and strengthen the accessibility requirements outlined in the *Election Act*.

Note: There are a number of requirements in the IASR, such as the transportation standard, some aspects of the design of public spaces standard and information and communications standard related to libraries and educational institutions, that do not apply to Elections Ontario due to the uniqueness of its business operations. As such, only applicable requirements in the IASR have been addressed and incorporated into this policy.

The requirements of the IASR that pertain to Elections Ontario include:

- the 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 IASR;
- the incorporation of accessibility in the provision of goods and services to persons with disabilities;
- providing training on the requirements of the accessibility standards to employees and other relevant stakeholders; and
- the specific requirements under the Information and Communications Standards; Employment Standards; Design of Public Spaces Standards and Customer Service Standards.

Section 2: Principles

Elections Ontario recognizes the significance of developing and implementing accessibility standards to prevent and remove barriers to accessibility for Ontarians with disabilities in a timely manner. As such, Elections Ontario's policies and procedures are guided by the core principles of dignity and independence, integration, and equality of opportunity, as described in the Customer Service Standards under the IASR.

In addition, the following overarching principles will guide Elections Ontario:

1. Goods and services will be provided in a manner that respects the dignity and independence of persons with disabilities;
2. The provision of goods and services or facilities to persons with disabilities and others will be integrated unless an alternate measure is necessary (either temporarily or on a permanent basis);
3. Persons with disabilities are given an opportunity equal to those given to others to obtain, use and benefit from the goods and services or facilities provided;
4. The method of communicating with persons with disabilities will take into consideration the person's individual preference or need; and
5. Equal opportunity, diversity in employment and an accessible work environment will be provided.

Section 3: Scope

- 1) This policy applies to all persons who deal with members of the public or other third parties on behalf of Elections Ontario, whether the person does so as an employee, Returning Officer, agent, volunteer, contractor, consultant or otherwise, and all persons who participate in developing Elections Ontario's policies, practices and procedures governing the provision of goods and services to members of the public or other third parties.
- 2) The policy is applicable during electoral events as well as during the day-to-day business operations of Elections Ontario.

Section 4: Definitions

Below is a list of definitions related to this policy, including terms related to accessibility, the voting process, and relevant technical terms:

Term	Definition
Accessible Formats	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	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.
Assistive Devices	Assistive Devices are defined as any piece of equipment or product that is used to increase, maintain, or improve functional capabilities of persons with disabilities.
Barrier	Barrier means anything that prevents a person with a disability from fully participating in all aspects of society because of a disability. Barriers may include physical, architectural, attitudinal, and technological barriers, as well as an information or communications barrier.
Communication Supports	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	Communications means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.
Conversion Ready	Conversion Ready means an electronic or digital format that facilitates conversion into an accessible format.
Elector	Elector means a person who is entitled under the <i>Election Act</i> to vote at an election to the Legislative

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Term	Definition
	<p>Assembly. A person is entitled to vote if they are, on the general polling day, 18 years of age, a Canadian citizen, resident in the electoral district and not disqualified under the <i>Election Act</i> or otherwise prohibited by law from voting.</p>
<p>Employees</p>	<p>Employees means all headquarters staff (permanent and temporary), Returning Officers and election officials.</p>
<p>Information</p>	<p>Information includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.</p>
<p>Kiosk</p>	<p>Kiosk is an interactive electronic terminal intended for public use that allows users to access one or more services or products, or both.</p>
<p>Maintenance</p>	<p>Maintenance 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.</p>
<p>New Internet Website</p>	<p>New Internet Website means either a website with a new domain name or a website with an existing domain undergoing a significant refresh.</p>
<p>Redeveloped</p>	<p>Redeveloped means planned significant alterations to public spaces, but does not include maintenance activities, environmental mitigation or environmental restoration.</p>
<p>Service Animals</p>	<p>Service Animals are animals trained to help people with disabilities maintain independence. It might be readily apparent that the animal is used by the person for reasons relating to the disability; the person with disability might provide a letter from a regulated health practitioner confirming that the person requires the animal for reasons relating to the disability; or the person provides a valid identification card or training certificate from a recognized guide dog or service animal training school.</p>

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Term	Definition
Support Person	Support Person means a person who accompanies a person with a disability to assist them with communication, mobility, personal care, or medical needs or with access to goods or services.
Unconvertible	Unconvertible means information or communications that cannot be converted to an accessible format because it is not technically feasible to convert it or the technology to convert it is not readily available.
Voter	Voter means an elector who has appeared at a polling place and has accepted a ballot for marking which has been placed in the ballot box or has declined their ballot and has so declared.
Web Content Accessibility Guidelines	Web Content Accessibility Guidelines means the World Wide Web consortium recommendations dated 2008, entitled “Web Content Accessibility Guidelines” (WCAG) 2.0.

Section 5: Mandatory Requirements

Elections Ontario is committed to identifying and meeting the accessibility needs of Ontarians with disabilities in an effective, appropriate, and timely manner through compliance with the standards under the IASR, AODA, the *Election Act* and the *Ontario Human Rights Code*. Elections Ontario is also committed to preventing and removing barriers to accessibility in the areas of Information and Communication, Employment, Design of Public Spaces and Customer Service.

Part I: General

Elections Ontario is committed to implementing the following obligations under the IASR and ensuring that persons with disabilities can access services that Elections Ontario provides with dignity, independence, integration, and equality of opportunity.

5.1 Multi-Year Accessibility Plan

Elections Ontario's Multi-Year Accessibility Plan (MYAP) was established to outline its strategy to prevent and remove barriers from its services, improve opportunities for persons with disabilities and meet its requirements under the IASR.

The MYAP was created in consultation with community agencies and individuals representing persons with disabilities. The MYAP is posted on Elections Ontario's website and will be available to the public in alternative formats upon request.

Elections Ontario will report annually on the progress and implementation of the strategies outlined in the MYAP, including steps taken to comply with the regulations governing accessibility for Ontarians, and will post the progress report on the organization's website.

The MYAP will be reviewed and updated at least once every five years in consultation with persons with disabilities.

5.2 Procuring or Acquiring Goods, Services or Facilities

Elections Ontario will incorporate accessibility design, criteria, and features when it procures or acquires goods, services, or facilities, except where it is not practicable to do so. Where Elections Ontario determines that it is not practicable to incorporate accessibility design, criteria, and features, when procuring or acquiring goods, services or facilities, Elections Ontario will provide, upon request, an explanation for the determination.

5.3 Training

Elections Ontario will ensure that training is provided on the requirements of accessibility standards referred to in the IASR, the *Human Rights Code* and the *Election Act* as it pertains to persons with disabilities.

Training will be provided to all employees (headquarters and field and Returning Officers; and all other persons who provide goods, services or facilities on behalf of Elections Ontario.

The frequency and format of training will be tailored to suit each person's interactions with the public and their involvement in the development of policies, procedures and practices pertaining to the provision of goods and services.

The content of the training will include, but is not restricted to, the following:

- a review of the purpose of the AODA;
- a review of the accessibility standards under the IASR; and
- a review of the requirements of the accessibility standards for Customer Service, including but not limited to:
 - how to interact and communicate with persons who have various types of disabilities;
 - how to interact with persons with disabilities who require the assistance of assistive devices, service animals, or support persons;
 - how to use assistive devices or equipment that Elections Ontario provides to help persons with disabilities to access Elections Ontario's goods and services;
 - what to do if a person with a disability is having difficulty accessing Elections Ontario's goods and services; and
 - instruction on Elections Ontario's policies, procedures and practices pertaining to the provision of goods and services to persons with disabilities.

The training provided will be appropriate to the duties of employees and other persons and will be provided as soon as practicable. Where there are changes to this policy and general accessibility requirements, training will be provided regarding those changes. For administrative purposes, Elections Ontario will maintain a record of the names of individuals trained and the date the training was provided.

Part II: Information and Communications Standards

Elections Ontario is committed to creating, providing, and receiving communications in ways that are accessible to persons with disabilities.

5.4 Feedback Process

Elections Ontario is committed to providing high quality goods and services to the public it serves. Feedback from the public is welcomed as it may identify areas that require change and encourage continuous service improvements.

As such, Elections Ontario will establish a process for receiving and responding to feedback from the public on the way it provides goods and services. Feedback about the delivery of goods and services can be provided by telephone, in person, in writing, in electronic formats or through other methods. Elections Ontario will ensure that its feedback process is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports upon request.

Information about the feedback process will be available to the public and notice of the process will be posted on Elections Ontario's website and at its premises, if applicable.

5.5 Accessible Formats and Communication Supports

Upon request for information or communication products, Elections Ontario will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner, considering the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons. Elections Ontario will consult with the requester to determine the suitability of an alternative format or communication support. If it is not technically feasible to convert the information or communications in an accessible manner, an alternative format of the summary of content will be developed in consultation with the person requesting the information or communication. The public will be notified of the availability of accessible formats and communication supports.

5.6 Accessible Websites and Web Content

Elections Ontario will ensure that its website (internal and public facing) and web content conforms with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, except where meeting the requirements is not practicable. This applies to Elections Ontario's internal and external website and web content controlled directly

or through a contractual relationship that allows for modification of the product.

5.7 Emergency Procedures, Plans or Public Safety Information

Where Elections Ontario prepares emergency procedures, plans or public safety information, and makes that information available to the public, the information will be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Part III: Employment Standards

Elections Ontario is committed to building an inclusive and accessible work environment that is free from discrimination by providing accessibility and support across all stages of the employment lifecycle for new employees and current employees.

5.8 Recruitment, Assessment, and Retention

As part of the recruitment process, Elections Ontario will advise its employees and the public about the availability of accommodations for people with disabilities. Applicants who are selected to participate in an assessment process will be notified that accommodations are available upon request in relation to the materials or processes used. When making an offer of employment, Elections Ontario will consult with the applicant regarding their request to determine a suitable accommodation that considers the applicant's accessibility needs due to a disability. Applicants provided with an offer of employment will be notified of Elections Ontario's policies for accommodating employees with disabilities.

5.9 Employee Supports (Policies, Accessible Format and Communication Support, and Return to Work)

Elections Ontario will inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on job accommodation that considers the employee's accessibility needs due to a disability. New employees will be informed as soon as practicable after they begin their employment; current employees will be notified immediately; and where there are changes to existing policies on the provision of job accommodation, all employees will be provided updated information.

Accessible formats and communication support will also be made available to employees upon request. Elections Ontario will consult with the employee to provide or arrange for the provision of accessible formats and communication supports that are needed for the employee to perform the employee's job and information that is generally available to employees in the workplace.

Elections Ontario is committed to supporting employees who return to work after being absent for reasons related to a disability and require disability-related accommodations to return to work. The return to work process is documented in Elections Ontario's Accessible Employment Standards Procedure.

5.10 Performance Management, Career Development, Advancement and Redeployment

Elections Ontario will consider the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

5.11 Documented Individual Accommodation Plans (IAP)

Elections Ontario's Accessible Employment Standards Procedure outlines the approach for developing IAPs for employees with disabilities. The IAP will be developed in collaboration with the employee to ensure that the plan takes into consideration the accessibility needs of the employee due to a disability. The plan will identify different areas the employee may require employment-related accommodations, and if requested, the plan may include information regarding accessible formats and communication supports relevant to the employee and individualized workplace emergency response information. The plan may be updated at the request of the employee or at the discretion of Elections Ontario.

5.12 Workplace Emergency Response Information

Elections Ontario will provide individualized workplace emergency response information to employees who have a disability, where the disability is such that individualized information is necessary, and where Elections Ontario is aware of the need for accommodation due to the employee's disability.

The workplace emergency response information will be provided to the employee as soon as practicable after Elections Ontario becomes aware of the need for accommodation. Where an employee who receives individualized workplace emergency response information requires assistance, and with the employee's consent, Elections Ontario will provide the workplace emergency response information to the person designated to provide assistance to the individual.

Elections Ontario will review the individualized workplace emergency response information when the employee or person responsible for providing support moves to a different location or leaves the organization, when the employee's overall accommodation needs or plans are reviewed,

and when Elections Ontario reviews its general emergency response policies.

Part IV: Design of Public Spaces Standards

Elections Ontario will incorporate accessibility requirements, where applicable, into all newly constructed or redeveloped public spaces to remove barriers in buildings and outdoor spaces for people with disabilities. The following four public space areas impact Elections Ontario on a new-build basis:

- Outdoor public use eating areas;
- Exterior paths of travel;
- Accessible parking; and
- Service-related elements (service counters, fixed queuing guides and waiting areas).

5.13 Maintenance of Accessible Elements

Elections Ontario will maintain its public spaces so that it provides an accessible environment that is safe and usable by everyone. Should Elections Ontario newly construct a building or redevelop any of the exterior paths of travel, accessible parking, or service-related elements of its building, Elections Ontario will document a maintenance procedure. The procedure will be included in the MYAP and include the following elements:

- the prevention and emergency maintenance required to ensure the accessible elements remain in place; and
- that proper temporary disruption processes are in place when repairing and maintaining public spaces

Part V: Accessible Customer Service Standards

Elections Ontario is committed to excellence in serving all persons including people with disabilities and ensuring that accessible customer service practices are consistent with the principles of independence, dignity, integration, and equality of opportunity for people with disabilities.

5.14 Use of Service Animals and Support Persons

Where Elections Ontario provides goods and services, persons with disabilities are permitted to enter premises owned and/or operated by Elections Ontario, accompanied by a service animal or a support person.

Persons who are accompanied by a service animal due to their disability will be permitted to keep the service animal with them if the public has access to such premises and the service animal is not otherwise excluded by law. If a service animal is excluded by law, Elections Ontario will use reasonable

efforts to ensure that alternate means are available to enable the person with a disability to obtain, use or benefit from Elections Ontario's goods and services. The service animal must be under the care and control of the individual at all times.

In the event that it is not readily apparent that the animal is a service animal or that the animal is clearly providing services to persons with disabilities, Elections Ontario staff may ask for a letter from a regulated health professional confirming that the person requires a service animal for reasons relating to their disability. The person may, as an alternate to the letter, provide a valid identification card or training certificate from a recognized guide dog or service animal training school.

Persons who are accompanied by a support person due to their disability are permitted to have access to their support person while on the premises that Elections Ontario owns and/or operates. The support person may assist the person with a disability with receiving any service provided by Elections Ontario, including registering to vote and voting.

5.15 Notice of Temporary Disruptions in Services and Facilities

Elections Ontario is aware that the operation of certain services and facilities is important to persons with disabilities. However, temporary disruptions in services and facilities may occur due to reasons that may or may not be within Elections Ontario's control or knowledge.

Elections Ontario will make reasonable efforts to provide notice of the disruption to the public, including information about what service is being disrupted, the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, which may be available.

Elections Ontario will make reasonable efforts to provide prior notice of planned disruptions, recognizing that in some circumstances, such as in the situation of an unplanned temporary disruption, advance notice will not be possible. In such cases, Elections Ontario will provide notice as soon as possible.

Elections Ontario will provide notice of a disruption to services and facilities by posting the information in visible places, voting locations and/or on Elections Ontario's website, or by any other method that may be reasonable under the circumstances, as soon as possible. The information on service disruption will be provided in alternative formats or communication supports upon request.

Part VI: Compliance – Reporting

In compliance with section 14 of the AODA, Elections Ontario will file an accessibility report with the government’s director appointed under the AODA at the end of each year. In addition, an annual accessibility status report will be written and made available to the public on Elections Ontario’s website.

Section 6: Roles and Responsibilities

The following are the major roles and responsibilities under the Integrated Accessibility Standards Policy.

1. Chief Electoral Officer

The Chief Electoral Officer (CEO) must ensure the development, implementation, and enforcement of accessibility standards as per the AODA as it relates to the IASR. Specifically, the CEO is accountable for:

- a) Developing and implementing policies and procedures that govern Elections Ontario's commitment to provide accessibility support to Ontarians with disabilities;
- b) Providing strategic direction for the development and implementation of a MYAP to prevent and remove barriers to accessibility; and
- c) Ensuring that all mandatory requirements in this policy are practiced, met, and reported.

2. Deputy Chief Electoral Office

The Deputy Chief Electoral Officer (DCEO) may act in place of the CEO if required. If acting for the CEO, the DCEO is accountable for the same responsibilities assigned to the CEO.

3. Accessibility Committee

The Accessibility Committee is responsible for promoting and coordinating accessibility throughout Elections Ontario.

4. Director, Field Operations & Training

The Director, Field Operations & Training is responsible for:

- a) Ensuring that training is provided to all field staff including Returning Officers and poll officials as soon as practicable, that adheres to this policy and related procedures.
- b) Maintaining records of the training provided to field staff, including the dates on which the training is provided, and the number of individuals trained; and
- c) Establishing performance criteria to enhance accountability for implementation of this policy and procedures.

5. Director, Communications

The Director, Communications is responsible for:

- a) Ensuring that processes are in place to provide documents in alternative formats upon request and notice to the public on the availability of alternative formats; and
- b) Ensuring that the website and materials on the website are accessible.

6. Director, People and Talent

The Director, People and Talent is responsible for:

- a) Supporting the development of practices and procedures as they relate to Part III, Employment Standards;
- b) Ensuring that all staff are trained on the Integrated Accessibility Standards Policy and ensuring that appropriate records are maintained; and
Creating awareness of accommodations requirements for people with disabilities.

7. Directors

All Directors are responsible for ensuring that staff are following processes as they relate to the requirements in this Policy.

8. Managers and Returning Officers

Managers and Returning Officers are responsible for:

- a) Implementing and managing internal procedures and appropriate practices to support the Integrated Accessibility Standards Policy;
- b) Training and mentoring staff to ensure that their roles are well defined in relation to the implementation and understanding of the policy;
- c) Accommodating employees with disabilities; and
- d) Ensuring that documents are available in accessible formats upon request.

9. Employees (HQ and Field)

Elections Ontario employees are responsible for:

- a) Ensuring they complete the mandatory Integrated Accessibility Standards Training;

- b) Incorporating accessibility requirements in their business practices to ensure that people with disabilities are treated with dignity, independence, integration and equal opportunity;
- c) Disclosing to their respective supervisor/manager or HR their accommodation needs;
- d) Reporting to their supervisor/manager any omission or discrepancy affecting the policy; and
- e) Reporting to their supervisor/manager any potential or actual violation or breach of the policy.

Section 7: Additional References

The following table identifies those Elections Ontario policies and procedures that expand upon the Integrated Accessibility Standards Policy.

Document Name	Author(s)
1. <i>Accessibility for Ontarians with Disabilities Act</i>	Legislative Assembly of Ontario
2. Ontario Regulation 191/11: Integrated Accessibility Standards	Legislative Assembly of Ontario
3. <i>Ontario Human Rights Code</i>	Legislative Assembly of Ontario
4. Site Accessibility Standards	Elections Ontario
5. Accessible Employment Standards Procedures	Elections Ontario
6. Accessible Communications Standard	Elections Ontario

Section 8: Approval

The following table shows the authorization and amendment and review dates for this policy.

Integrated Accessibility Standards Policy	
Authorization	 Greg Essensa Chief Electoral Officer Date: September 2, 2024
Effective Date	September 30, 2024
Date Last Amended	August 4, 2020
Date of Next Review (Once per election cycle)	August 2028
Contact Information	Email: info@elections.on.ca Telephone: 1-888-668-8683 TTY: 1-888-292-2312