



**Elections  
Ontario**

# **Integrated Accessibility Standards Policy**

Office of the Chief Electoral Officer  
Elections Ontario

April 2017

## Document History

Revision Number	Revision Date	Effective Date	Description of Changes	Approved By
003	Month, DD, Year	Month, DD, Year	<p><i>Document revisions:</i></p> <ul style="list-style-type: none"> <li>• Updated policy with information related to compliance for intranet and accessible formats</li> <li>• Simplified design of public spaces.</li> <li>• Removed reference to `Textbook and supplementary learning materials` as only applies to school boards.</li> <li>• Added intro to Employment Standard.</li> <li>• Removed references to spent timelines</li> <li>• Formatted document to be accessible.</li> </ul>	XXX
002	February 25, 2014	January 1, 2014	<p><i>Document revisions:</i></p> <ul style="list-style-type: none"> <li>• <i>Legislative/Regulatory – Reflects amendments to O.Reg.191/11:</i> <ul style="list-style-type: none"> <li>○ P.5, s.4, h) and j).</li> <li>○ P.6, s.7, Part I (A) IV.</li> <li>○ P.6, s.7, Part I (B) I.</li> <li>○ P.11, s.7, Part IV.</li> <li>○ P.12, s.7, Part V.</li> </ul> </li> <li>• <i>Content – updates policy to clarify and reflect updated interpretation:</i> <ul style="list-style-type: none"> <li>○ P.5, s.4, i).</li> <li>○ P.8, s.7, Part II (B) I f.</li> <li>○ P.8, s.7, Part II (D) I b &amp;c.</li> <li>○ P.9, s.7, Part II (E) I.</li> </ul> </li> </ul>	Greg Essensa, CEO
001	Not Applicable	January 1, 2012	Original	Greg Essensa, CEO

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### Section 1: Introduction

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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 legally bound to comply with the accessibility standards stipulated in the *Election Act*, the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and the various standards under the AODA.

In providing the overall strategic direction for Elections Ontario's commitment to providing accessibility supports to Ontarians with disabilities, this policy particularly addresses the mandatory requirements in the *Integrated Accessibility Standards* (Ontario Regulation 191/11) under the AODA. This Regulation establishes accessibility standards for information and communications, employment, transportation, and design of public spaces.

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 a number of requirements in the *Integrated Accessibility Standards*, such as the transportation standard, some aspects of the design of public space standard and information communication standard related to related to libraries and education institution, do not apply to Elections Ontario due to the uniqueness of the business operations of Elections Ontario. As such, only applicable requirements in the *Integrated Accessibility Standards* have been addressed and incorporated into this policy.

The requirements of the *Integrated Accessibility Standards* 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 this Regulation;
- the incorporation of accessibility criteria and features when procuring or acquiring goods, services or facilities;
- the incorporation of accessibility features when designing, procuring or acquiring self-service kiosks;
- training;
- the specific requirements under the Information and Communications Standard;
- Employment Standards; and
- Design of Public Spaces Standard.

### Section 2: Principles

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Elections Ontario recognizes the history of discrimination against persons with disabilities in Ontario, and the fundamental importance of developing, implementing and enforcing standards in a timely manner in order to achieve accessibility for Ontarians with disabilities. As such Elections Ontario is guided by the core principles of independence, dignity, integration, and equality of opportunity, as described in the *Accessibility for Ontarians with Disabilities Act, 2005*, and the standards mandated by it through enacted regulation as part of our vision of setting the standard for electoral process excellence.

The core principles ensure that goods and services are provided in a manner that:

1. respects the **dignity** of persons with disabilities;
2. respects the **independence** of persons with disabilities;
3. is **integrated** for persons with disabilities unless an alternate measure is necessary (either temporarily or on a permanent basis); and
4. is **equal** to that given to others to obtain, use and benefit from the goods and services provided.

### Section 3: Scope

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- 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, 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) Where the policy refers to Elections Ontario it includes Returning Officers, Returning Office staff and poll officials.
- 3) The policy applies to an event as well as day-to-day election administration.

## Section 4: Definitions

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

Term	Definition
<b>Accessible Formats</b>	<b>Accessible formats</b> may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
<b>Accommodation</b>	<b>Accommodation</b> 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.
<b>Assistive Devices</b>	<b>Assistive Devices</b> are defined as any piece of equipment or product that is used to increase, maintain or improve functional capabilities of persons with disabilities.
<b>Barrier</b>	<b>Barrier</b> shall mean 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 and attitudinal barriers as well as any information.
<b>Communication Supports</b>	<b>Communication supports</b> may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
<b>Communications</b>	<b>Communications</b> means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.
<b>Conversion Ready</b>	<b>Conversion Ready</b> means an electronic or digital format that facilitates conversion into an accessible format.
<b>Elector</b>	<b>Elector</b> means a person who is entitled under the <i>Election Act</i> to vote at an election to the 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.
<b>Kiosk</b>	<b>Kiosk</b> is an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

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Term	Definition
<b>Information</b>	<b>Information</b> includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.
<b>Maintenance</b>	<b>Maintenance</b> 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.
<b>New Internet Website</b>	<b>New Internet Website</b> means either a website with a new domain name or a website with an existing domain undergoing a significant refresh.
<b>Unconvertible</b>	<b>Unconvertible</b> 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.
<b>Redeveloped</b>	<b>Redeveloped</b> means planned significant alterations to public spaces, but does not include maintenance activities, environmental mitigation or environmental restoration.
<b>Voter</b>	<b>Voter</b> 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.
<b>Web Content Accessibility Guidelines</b>	<b>Web Content Accessibility Guidelines</b> means the World Wide Web consortium recommendations dated 2008, entitled "Web Content Accessibility Guidelines" (WCAG) 2.0.



## Section 5: Mandatory Requirements

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Elections Ontario is committed to the principles of independence, dignity, integration, and equality of opportunity, described in the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), and to meeting the needs of people with disabilities, in a timely manner, through the implementation of this policy.

There are a number of general and specific deliverables for each of the standards under the AODA that must be met. These standards pertain to Employment, Information and Communications, and Public Spaces.

### Part I: General

The following four general deliverables are required and shall be implemented by Elections Ontario:

#### 5.1 Multi-Year Accessibility Plan

Elections Ontario's Multi-Year Accessibility Plan (MYAP) is established to outline a strategy to prevent and remove barriers and address the current and future requirements of the AODA legislation.

The MYAP is created in consultation with community agencies and individuals representing persons with disabilities. Once created, the MYAP is posted on the 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 MYAP, including steps taken to comply with the regulation governing integrated accessibility standards, 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

Under the *Election Act* (112.2), Elections Ontario shall ensure that the procurement directive and guidelines applicable to the public service of Ontario are followed, as appropriate, for election disbursements.

Elections Ontario's Goods and Services Policy has been amended to include the following requirements:

- Accessibility design, criteria and features will be incorporated when procuring or acquiring goods, services or facilities, except where it is not practicable to do so; and
- Where 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.

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### **5.3 Self- Service Kiosks**

When, where and if applicable, accessibility features will be incorporated when designing, procuring or acquiring self-service kiosks.

### **5.4 Training**

Elections Ontario will ensure that training is provided on the requirements of accessibility standards referred to within the Integrated Accessibility Standards (Ontario Regulation 191/11) and in the *Human Rights Code* as it pertains to persons with disabilities.

Training will be provided to:

- All employees and volunteers;
- All persons who participate in developing the organization's policies; and
- All other persons who provide goods, services or facilities on behalf of the organization.

The training provided will be appropriate to the duties of employees, volunteers and other persons.

Training will be provided as soon as practicable to employees, volunteers and other persons.

Where there are changes to the Integrated Standards Accessibility Policy, training will be provided with regard to those changes.

Elections Ontario will maintain a record of the dates and the number of individuals to whom training is provided.

## **Part II: Information and Communications Standard**

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

### **5.5 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.

### **5.6 Accessible Websites and Web Content**

Elections Ontario's new internet and intranet websites and web content on those sites shall conform to the WCAG 2.0 Level AA requirements, with the following explanations;

- a) All internet websites and web content will comply to the WCAG 2.0 Level AA by January 1, 2016, other than Live Captioning 1.2.4; and
- b) Audio Descriptions (pre-recorded) 1.2.5.

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- Intranet websites will conform by January 1, 2020;
- Except where not practicable, websites and web content, including web-based applications, that Elections Ontario controls directly or through a contractual relationship that allows for modification of the product, are included in this existing timeline;
- Where practicable, new web content published on a website after January 1, 2012 is included in this timeline; and
- Web content that is convertible and was originally posted on a website before January 1, 2012 will be available in an accessible format upon request.

### 5.7 Feedback

Feedback on how services are delivered to people with disabilities shall be accepted, forwarded to the appropriate personnel, responded to upon request, documented and tracked. Feedback shall be collected by telephone, in person in writing, in electronic formats or through other methods. The feedback process shall be provided in accessible formats and with communication supports as required.

The public will be notified regarding the availability of accessible formats and communication supports.

### 5.8 Accessible Formats and Communication Supports

Elections Ontario will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, for information or communication that Elections Ontario produces:

- In a timely manner that takes into account the person's accessibility needs due to disability;
- If there is a cost, at a cost that is no more than the regular cost charged to other persons;
- Elections Ontario will consult with the person making the request in determining the suitability of an alternative format or communication support;
- Elections Ontario will notify the public about the availability of accessible formats and communication supports; and
- If it is not technically feasible to convert the information or communications into an accessible manner, Elections Ontario will provide an explanation and a summary of the content.

## Part III: Employment Standards

The Employment Standards build upon the existing requirements under the *Ontario Human Rights Code*. The Employment Standards set out how Elections Ontario will provide accessibility and support throughout the entire employment cycle: recruitment, assessment and retention. The Employment Standards apply to new employees and current employees and do not apply to volunteers and other non-paid individuals.

### 5.9 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

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- Where Elections Ontario is aware of the need for accommodation due to the employee's disability.

If an employee with individualized information requires assistance and provides consent, Elections Ontario will provide the individualized information to the person designated by Elections Ontario to provide assistance to the employee.

Individualized information is provided as soon as practicable after Elections Ontario becomes aware of the need for accommodation due to an employee's disability.

Elections Ontario will review the individualized workplace emergency response information;

- When the employee moves to a different location;
- When the employee's overall accommodation needs or plan are reviewed; and
- When Elections Ontario reviews its general emergency response policies.

### **5.10 Recruitment**

Elections Ontario will notify its employees and the public about the availability of accommodations for applicants with disabilities in its recruitment process.

### **5.11 Assessment**

Applicants who are individually selected to participate in an assessment process will be notified that accommodations are available upon request in relation to the materials or processes used.

If a selected applicant requests an accommodation, Elections Ontario will consult with the applicant, having regard for the applicant's accessibility needs, on the provision of a suitable accommodation.

### **5.12 Retention**

When making an offer of employment, Elections Ontario will notify the successful applicant of its policies for accommodating employees with disabilities.

### **5.13 Informing Employees of Supports**

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 take into account 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.

### **5.14 Documented Individual Accommodation Plans (IAP)**

Elections Ontario has a written process for the development of individual accommodation plans for employees with disabilities. If an employee requests accommodation, a documented Individual

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Accommodation Plan (IAP) will be developed with participation from both the employee and employer as per Elections Ontario's Accessible Employment Standards Procedures.

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

Where an employee requests it, Elections Ontario will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for;

- Information that is needed in order for the employee to perform the employee's job; and
- Information that is generally available to employees in the workplace.

Elections Ontario will consult with the employee making the request in determining the suitability of an accessible format or communication support.

### **5.16 Return to Work**

Elections Ontario has a documented return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

### **5.17 Performance Management**

Where Elections Ontario uses performance management in respect of its employees, the accessibility needs of employees with disabilities, and individual accommodation plans are taken into account.

### **5.18 Career Development and Advancement**

Where Elections Ontario uses career development and advancement in respect of its employees, the accessibility needs of employees with disabilities, and individual accommodation plans are taken into account.

### **5.19 Redeployment**

Where Elections Ontario uses redeployment, the accessibility needs of employees with disabilities and individual accommodation plans are taken into account.

## **Part IV: Design of Public Spaces Standards**

Elections Ontario will incorporate accessibility requirements into all newly constructed or redeveloped public spaces that are created on or after January 1, 2015. We will ensure that we follow the requirements, where applicable, as stated under the Design of Public Spaces Standards. The following three public space areas impact Elections Ontario on a new-build basis:

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

### **5.20 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 be in a position to newly construct a

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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 Multi-Year Accessibility Plan 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: Compliance – Reporting**

Elections Ontario files an accessibility report with a director appointed under section 30 of the *Accessibility for Ontarians with Disabilities Act, 2005*:

- Annually by December 31st;
- In the form approved by the Minister and with prescribed information; and
- Makes the report available to the public.

### Section 6: Roles and Responsibilities

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

#### Chief Electoral Officer

- (1) The Chief Electoral Officer (CEO) must ensure the development, implementation and enforcement of accessibility standards as per the *Accessibility for Ontarians with Disabilities Act* as it relates to the Integrated Accessibility Standards Regulation. Specifically the CEO is responsible for:
  - a) Developing and implementing policies and procedures that govern Elections Ontario's commitment to provide accessibility support to Ontarians with disabilities;
  - b) Provide strategic direction for the development and implementation of a Multi-Year Accessibility Plan to prevent and remove barriers to accessibility; and
  - c) Ensuring that all mandatory requirements in this policy are practiced, met and reported on.

#### Assistant Chief Electoral Officer

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

#### Director, Strategic Services

- (3) The Director, Strategic Services is responsible for:
  - a) Ensuring deliverables from Integrated Accessibility Standards Regulation are met and reported on as required;
  - b) Advising the CEO of any policy gaps that need to be addressed and developing appropriate procedures and practices to address same; and
  - c) Ensuring the implementation of the Multi-Year Accessibility Plan.

#### Director, Election Readiness

- (4) The Director of Election Readiness is responsible for:
  - a) Developing business practices to ensure compliance with the policies and procedures that have been developed to ensure that requirements outlined in this policy are met;
  - b) Establishing performance criteria to enhance accountability for implementation of policies and procedures;
  - c) Ensuring that guidelines reflect current business practices;
  - d) Ensuring training is provided to all staff including Returning Officers and poll officials that adheres to this policy and related procedures; and
  - e) Ensuring that staff are following processes as they relate to the deliverables for General Requirements, Employment Standard, Information and Communications Standard and Public Spaces Standard set out in the Multi-Year Accessibility Plan.

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### **Director, Communications**

(5) The Director of Communications is responsible for:

- a) Ensuring that processes are in place to ensure documents are provided in alternative formats upon request and that notice to the public provided;
- b) Ensuring that the website and materials on the website are accessible as per these policies, Part 11, Information and Communications Standard; and
- c) Ensuring that staff are following processes as they relate to the deliverables for General Requirements, Employment Standard, Information and Communications Standard and Public Spaces Standard set out in the Multi-Year Accessibility Plan.

### **Director, Shared Services**

(6) The Director of Shared Services is responsible for:

- a) Developing business practices to ensure compliance with the policies and procedures that have been developed to ensure that requirements outlined in this policy are met;
- b) Establishing performance criteria to enhance accountability for implementation of policies and procedures;
- c) Ensuring that guidelines reflect current business practices;
- d) Supporting the development of practices and procedures as they relate to Part III, Employment Standards are implemented and maintained appropriately;
- e) Ensuring that all staff are trained on the Integrated Accessibility Standards Policy and ensuring that appropriate records are maintained;
- f) Supporting the delivering of the requirements outlined in this policy to people with disabilities; and
- g) Creating awareness of accommodations requirements for people with disabilities; and
- h) Ensuring that staff are following processes as they relate to the deliverables for General Requirements, Employment Standard, Information and Communications Standard and Public Spaces Standard set out in the Multi-Year Accessibility Plan.

### **All Directors**

(7) All Directors are responsible for:

- a) Ensuring that staff are following processes as they relate to the deliverables for General Requirements, Employment Standard, Information and Communications Standard and Public Spaces Standard set out in the Multi-Year Accessibility Plan.

### **Managers**

(8) Managers 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



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- d) Ensuring that documents are available in an accessible format upon request.

### HQ Staff and Field Staff

(9) Elections Ontario staff 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 personnel 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

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


Document Name	Author(s)
1. Accessible Customer Service Policy	Elections Ontario
2. Site Accessibility Standards	Elections Ontario
3. Accessible Employment Standards Procedures	Elections Ontario
4. Accessible Communications Standard	Elections Ontario

## Integrated Accessibility Standards Policy

### Section 8: Approval

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

Integrated Accessibility Standards Policy	
<b>Authorization</b>	Chief Electoral Officer  Date:
<b>Effective Date</b>	April 19, 2017
<b>Date Last Amended</b>	April 19, 2017
<b>Date of Next Review</b> (Once per election cycle)	Post 2018 election cycle
<b>Contact Officer</b>	Kevin Lum-Yip Manager, Policy and Strategic Planning <a href="mailto:kevin.lum-yip@elections.on.ca">kevin.lum-yip@elections.on.ca</a>