

# 2022 Status Update to the Multi Year Accessibility Plan

# Multi Year Accessibility Plans and Annual Status Reports

Current and past Multi Year Accessibility Plans and Annual Status Updates are available on the <u>EO website</u>.

Requests for accessible formats and communication supports are provided or arranged for in a timely manner that considers the person's needs due to the disability.

# Accessibility Feedback

Elections Ontario recognizes that feedback is critical to the process of identifying and removing barriers to participation, as well as improving how we deliver our services to persons with disabilities.

Should you require assistance with our website, or want to provide general feedback, please contact us in one of the following ways:

Email: info@elections.on.ca

Phone: 1-888-668-8683

• TTY: 1-888-292-2312

• Fax: 1-866-714-2809

Mail: Elections Ontario, 51 Rolark Drive, Toronto, Ontario, M1R 3B1

• In person at 51 Rolark Drive, Toronto

All questions and feedback will be processed within 24 hours.

# **Table of Contents**

Message from the CEO	4
Overview	5
Background and Legislation	5
Commitment to the Plan	5
Consultations	6
MYAP Committee	6
Internal Accessibility Advisory Committee	7
Accessibility Compliance and MYAP Status Reports	7
General Requirements	9
Table 1 - Meeting Requirements	9
Customer Service Standard	12
Table 2 - Meeting Requirements	12
Information and Communications Standard	18
Table 3 - Meeting Requirements	18
Employment Standard	21
Table 4 - Meeting Requirements	21
Design of Public Spaces Standard	26
Table 5 - Meeting Requirements	26
Exceeding AODA Standard Requirements	29
New WCAG Guidelines	29
Voting Technology	29
Health & Safety	30
Moving Forward	31
MYAP Committee	31
Increasing Employment Opportunities for persons with disabilities	31
Secretariat for Electoral Coordination Compendium	32
AODA Standard Amendments & New Standards	32
Accessible Canada Act	33
In Closing	35

# Message from the CEO

I am pleased to present the "2022 Status Update to the Multi Year Accessibility Plan." This report will highlight our progress in the first year of our five-year Multi Year Accessibility Plan (MYAP) to promote accessibility and inclusion in the electoral process.

At Elections Ontario, our mission is to uphold the integrity and accessibility of the electoral process by managing elections in an efficient, fair, and impartial manner. We place great importance on the dignity, independence, integration, and equal opportunity of all electors in Ontario.

In 2022, we faced challenges as we delivered a general election while adapting to COVID-19 safety measures. Despite these challenges, we made significant improvements to services for Ontarians with disabilities. Our efforts included embedding American Sign Language and Langue des Signes Québécoise interpretation into our staff training videos, improving the readability of braille on our products, launching the AODA compliant Elections Ontario app pilot, and ensuring Assistive Voting Technology was available in all returning offices on the election day. Our commitment to identifying and removing barriers to accessibility remains strong. We will continue to work towards our goals outlined in the Multi Year Accessibility Plan 2022-2026 to make voting more accessible and inclusive for all Ontarians.

Greg Essensa

Chief Electoral Officer

## Overview

Elections Ontario (EO) prepared the annual Multi Year Accessibility Plan (MYAP) Status Report on the progress made towards implementing the MYAP. This is our annual status report for the first year of the 2022 to 2026 MYAP.

# **Background and Legislation**

The Accessibility for Ontarians with Disabilities Act (the AODA, or the Act) was enacted with a purpose of creating accessibility standards to ensure Ontarians with disabilities can access goods, services, spaces, and employment opportunities. The specific Standards are consolidated under the Act's Integrated Accessibility Standards Regulation (IASR) which establishes accessibility requirements for the five legislative Standards: Customer Service, Information and Communications, Employment, Transportation, and the Design of Public Spaces. EO is not required to comply with the Transportation Standard of the IASR.

Under the *Ontario Human Rights Code* (OHRC), EO has ongoing obligations to accommodate persons with disabilities (PWDs), and to ensure persons with disabilities are not subject to undue hardship. The AODA and its requirements are incorporated into all areas of Election Administration at EO, and we recognize the need for additional accommodation measures that go beyond the Act may be required in accordance with the OHRC.

## Commitment to the Plan

EO remains committed to prevention and accommodation as principles to remove access barriers for its employees and customers with disabilities.

EO has embedded the Act's four principles into all areas of our work, both internally for staff and externally for the more than 10.7 million eligible electors who we serve:

- 1. **Dignity**: EO respects the dignity of persons with disabilities who are treated as valued and as deserving of effective and full provision of its goods, services, or facilities as any other customer.
- 2. **Independence:** Persons with disabilities are given the independence to make their own choices and do things their own way when accessing EO's goods, services, or facilities.
- 3. Integration: EO's provision of its goods, services, or facilities is integrated to allow persons with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers.

4. **Equality of opportunity:** persons with disabilities have an equal opportunity as others to obtain, use and benefit from EO's goods, services, or facilities without making significantly more effort.

Staff are provided with guidelines, policies, training, best practices, and procedures to continue incorporating accessibility across the organization.

#### Consultations

EO's MYAP is created every five years and guides staff on how to implement the Act's legislative requirements by outlining the steps that should be taken to meet each requirement. Our plan demonstrates how we will play a role in making the province accessible for all Ontarians.

We recognize and appreciate the input and continued support from individuals and community agencies representing persons with disabilities across the province. Their expertise has helped to guide EO as we continually improve and enhance the services we provide.

The organizations that helped us create the 2022 to 2026 MYAP, and who continue to provide support through our MYAP Committee are:

- Alliance for Equality of Blind Canadians
- Alzheimer Society of Toronto
- Arthritis Society
- Bob Rumball Canadian Centre of Excellence for the Deaf
- Canadian Hearing Services
- CNIB, Toronto & Ottawa
- Canadian Mental Health Association
- Community Living Ontario
- March of Dimes Canada
- Ontario College of Art & Design University
- Ontario Federation for Cerebral Palsy
- Parkinson Canada
- Spinal Cord Injury Ontario

#### **MYAP Committee**

Making voting easy begins with listening and responding to feedback from persons with disabilities and the community agencies that amplify the voices of persons with disabilities. The MYAP Committee at EO consists of representatives from the community agencies and EO hosts regular meetings with the MYAP Committee to develop our plans and to gain insights from the

community's experiences and expertise. These consultations are vital to our goal of incorporating accessibility into all areas of our electoral processes.

For example, the feedback from the MYAP Committee was imperative in ensuring the new EO app had clear and concise instructions on its use. Furthermore, feedback from the MYAP Committee steered the development of more cogent instructions on the availability and use of Accessible Voting Technology (AVT) and Vote by Mail (VbM).

## Internal Accessibility Advisory Committee

In April 2020, a standing committee was established as part of EO's governance structure to ensure that we continue to consider accessibility in every aspect of our service delivery, including products, policies, processes, and protocols.

The Accessibility Advisory Committee includes members from every division within EO, and is responsible for reviewing research, communicating legislative requirements, and disseminating industry and community best practices and anecdotes from the community.

In its first two years, the committee established a process to assess the recommendations from the MYAP committee and identify opportunities and issues to determine how EO can introduce changes that will improve services for voters with disabilities.

Our key deliverables for the 2022 to 2026 MYAP include continuing our research and provision of accessible tools and services and increasing employment opportunities for persons with disabilities at EO headquarters and in positions that become available during elections. To do this, we plan to strengthen our connections with agencies that work to increase employment opportunities for job seekers with disabilities. We will also review and refresh staff training content, including interacting with and accommodating persons with less known and understood disability types like those that are invisible and less visible.

## Accessibility Compliance and MYAP Status Reports

Under the Act, EO must file annual Accessibility Compliance Reports with the Ministry for Seniors and Accessibility. The most recent report was filed in November 2022 outlining how EO met each of its deliverables.

The Act requires EO to prepare annual MYAP Status Reports. This report documents activity planning and implementation undertaken by EO related to the MYAP over the given year from January 1st to December 31st.

The following is an update on 2022 MYAP initiatives to meet the Act's General Requirements, as well as requirements specific to the IASR's Customer

Service, Information and Communications, Employment and Spaces Standards.	Design of Public
2022 MYAP Status Report	Page <b>8</b> of <b>35</b>

# **General Requirements**

There are four general requirements that EO must implement in accordance with the Act:

- 1. Accessibility policies
- 2. Multi year accessibility plans
- 3. Accessible procurement policies and processes
- 4. Staff training

A table outlining these requirements, and EO's compliance and 2022 actions related to them, appears below:

Table 1 - Meeting Requirements

Section	Requirement Processing Requirement	Compliance	2022 Actions
3	Organizations must establish and maintain policies on how they will meet their obligations under the IASR.	EO's Accessible Customer Service and IASR policies are compliant with each requirement under section 3, including a statement of organizational commitment to meet the needs of persons with disabilities in a timely manner.	EO's accessibility policies continue to be made publicly available on our website and provided in an accessible format upon request.  We will ensure any amendments made to Standards under the IASR are added to the policy and communicated to all EO staff.
4	Establish, implement, maintain, and document a multi year accessibility plan (MYAP), that outlines the organization's strategy to prevent and remove barriers	EO has implemented, documented, and maintained three MYAPs since this requirement was established.  EO has also provided annual status reports on the progress of measures taken to implement the strategy	At the end of 2021, EO's 2022 to 2026 MYAP was developed and posted on the website.  The MYAP and annual status reports are established, reviewed, and

Section	Requirement	Compliance	2022 Actions
	and meet its requirements under the IASR.	referenced in the MYAP, including steps taken to comply with the IASR.	updated in consultation with persons with disabilities, posted on EO's website and provided in an accessible format upon request.
	Incorporate accessibility design, criteria and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so.	EO has a request for proposals (RFP) process that requires all contractors or service providers working on our behalf to be previously trained on, and understand, the Standards applicable to the procurement request.	Based on the standards that were applicable to the procurement request, contractors and service providers continue to be trained on the CSS and accessibility-related obligations under the OHRC.
5		Vendors for all formal procurement requests are required to submit a document describing their accessible training policy as part of their response to a RFP, including a summary of the training and training dates.	Additional training for the Information and Communications, Employment and Design of Public Spaces Standards was not required in 2022 but will be available on an ongoing basis depending on the RFP.
6	Organizations shall incorporate accessibility features when designing, procuring, or	When EO chooses to procure self-service kiosks, accessibility features will be incorporated.	EO did not design, procure, or acquire any self-service kiosks in 2022.

Section	Requirement	Compliance	2022 Actions
	acquiring self- service kiosks.		
7	Organizations shall ensure that training is provided on the requirements of the standards under the IASR and on the OHRC as it pertains to persons with disabilities.	All current HQ staff have been trained on the CSS, IASR and OHRC in accordance with the AODA.  On an ongoing basis, training on the CSS, IASR and OHRC in accordance with the AODA is provided to new staff during their first week of employment.  Records are maintained on who was trained and when.	In 2022, videos on our website, including staff training videos, became more accessible as we began embedding American Sign Language and Langue des Signes Québécoise interpretation within them.  Additionally, audio descriptions will be embedded in all new videos, or a separate audio track will be provided.

# **Customer Service Standard**

The Customer Service Standard (CSS) applies to public, private, and non-profit organizations in Ontario with one or more employees. Organizations that provide goods or services, either directly to the public or to other organizations in Ontario (third parties), must develop and comply with the CSS.

Below are six legislated requirements that EO must implement under the CSS:

- 1. Establishment of policies
- 2. Use of service animals and support persons
- 3. Notice of temporary disruptions
- 4. Training for staff, etc.
- 5. Feedback process required
- 6. Format of documents

A table outlining these requirements and EO's compliance and 2022 actions related to them appears below:

Table 2 - Meeting Requirements

Section	Requirement	Compliance	2022 Actions
80.46	In addition to the requirements in section 3 of the IASR's General Requirements, every provider shall develop, implement, and maintain policies governing its provision of goods, services, or facilities, as the case may be, to persons with disabilities.	EO maintains both an Site Accessibility Standards Policy and an IASR Policy in consultation with internal and external persons with disabilities. The policies outline EO's commitment to meeting its general, information and communications, employment, design of public spaces and customer service requirements under the IASR by or before compliance dates. The policies also address the specific	In response to feedback requesting more accessible options to obtain information about upcoming elections, the EO mobile app was developed and piloted in the 2022 general election.  The app allowed users to view personalized information specific to their electoral district and voting location on mobile devices and was also designed to

Section	Requirement	Compliance	2022 Actions
		requirements of the CSS and IASR that broaden and strengthen the accessibility requirements outlined in the <i>Election Act</i> .  The policy is posted on our website for the public and a copy is available to any person upon request, including request for copies in an accessible format.	work with accessibility settings enabled on that device.  Users who chose to create an account could also opt-in to receive notifications through their preferred channel(s), such as email, SMS and/or push. Those who linked their account to their elector record received a digital version of their voter information card (dVIC) directly to their device, which could also be used in lieu of a paper VIC at the polling stations.
80.47	If a person with a disability is accompanied by a guide dog or other service animal, the provider shall ensure that the person and the service animals are permitted to enter the premises, unless the animal is otherwise excluded	All service animals are permitted to enter all EO premises including voting locations during elections. If a service animal is excluded by law from the premises, alternative access to EO's goods, services or facilities shall be provided (e.g. curbside voting).  Similarly, EO allows support persons to	As per EO's CSS Policy, all new employees have been trained and aware of the fact that service animals and support persons are permitted to go anywhere persons with disabilities are allowed. Furthermore, all employees are reminded not to

Section	Requirement	Compliance	2022 Actions
	by law from the premises.  If a person with a disability is accompanied by a support person, the provider shall ensure that both persons are permitted to enter the premises together and that the person with disabilities is not prevented from having access to the support person while on the premises.	accompany persons with disabilities and enter EO premises to assist in ways such as communication, mobility, or personal care for medical needs.	touch or interact with a service animal.  Similarly, we will continue to permit persons with disabilities to bring their support person with them when accessing any of our goods, services or facilities and staff will be instructed on how to accommodate electors with support persons.
80.48	If there is a temporary disruption in whole or in part of the facilities or services persons with disabilities use to obtain or benefit from a provider's goods, services or facilities, the provider shall give the notice of disruption to the public.	Our IASR policy instructs staff to provide a notice of disruption to the public, whenever applicable, including information about disruptions to access to the goods, service or facilities, the reason for the disruption, its anticipated duration, and a description of alternative access to our goods, services or facility that may be available.	In the 2022 general election, 100 notices of disruptions were issued to denote service disruptions at voting locations.  In addition to physical notices that were posted in all major entrances to the voting locations, the service disruption was communicated to the electors via our website and the mobile app.  During a byelection or general

Section	Requirement	Compliance	2022 Actions
			election, we will continue to provide a notice of service disruption at impacted voting locations and on our website, if necessary, so that voters with disabilities are aware of the disruption and the alternatives that may be available to them.
80.49	In addition to the requirements in section 7 of the IASR's General Requirements, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services, or facilities to persons with disabilities:  • Employees  • Persons who participate in developing the organization's policies  • All other persons who provide goods, services, or facilities on	EO's customer service training includes a review of the purposes for the AODA and CSS requirements, plus instruction about:  Interacting and communicating with persons with various disability types.  Interacting with persons with disabilities who use an assistive device or require the assistance of a service animal or support person.  How to use equipment or devices available on our premises or otherwise provided by us that may help with the provision of goods, services, or facilities	In 2022, we continued to administer our CSS training on an ongoing basis to our staff, new hires are trained on CSS processes as part of employee onboarding. Records of CSS training for each employee are retained with EO. Upon request, documentation describing training policies and content will be provided in an accessible format.

Section	Requirement	Compliance	2022 Actions
	behalf of the organization	to persons with disabilities.  • What to do if a person with a particular type of disability is having difficulty accessing our goods, services, or facilities.	
80.50	Every provider shall establish a process for receiving and responding to, (a) feedback about the manner in which it provides goods, services, or facilities to persons with disabilities. (b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3) - Every provider shall ensure that the feedback process is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, on request.	EO has a feedback process that specifies the actions it will take if a complaint is received and the way it provides goods, services, or facilities to persons with disabilities.  We ensure that the feedback process is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, on request.  Information about the feedback process is also readily available to the public on our website.	EO has information on its website to inform persons to whom it provides goods, services, or facilities about its feedback process and how it's available on request in accessible formats.  The information is reviewed and updated on an ongoing basis in lieu of changes made to the feedback process.  Persons with disabilities can provide feedback in multiple ways, including by phone, email, fax, TTY, mail or through our website.

Section	Requirement	Compliance	2022 Actions
80.51	When a provider receives a request from a person with a disability for a copy of a document they must provide or arrange for the provision of the document, or the information contained in the document, in an accessible format or with communication support.	When EO receives requests for a copy of a document in an accessible format or to arrange for a communication support, requests are fulfilled as soon as practicable at a cost that is no more than the regular cost charged to other persons.	EO continues to consult with the person making the request to determine the suitability of an accessible format or communication support based on the person's accessibility needs.

# Information and Communications Standard

To help persons with disabilities access sources of information and communications, organizations like EO are required to incorporate accessibility in the following four areas:

- 1. Feedback
- 2. Accessible formats and communication supports
- 3. Emergency procedure, plans or public safety information
- 4. Accessible websites and web content

A table outlining these requirements and EO's compliance and 2022 actions related to them appears below:

Table 3 - Meeting Requirements

Section	Requirement	Compliance	2022 Actions
11	Organizations shall ensure their processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports upon request.  Nothing in this section detracts from the obligations imposed by the CSS, section 80.50.	EO gathers feedback from voters and other stakeholders as part of our ongoing efforts to modernize the electoral process to better meet the needs of voters. This includes identifying and eliminating barriers to voting for persons with disabilities.  We collect feedback through many channels, including regular consultations with our MYAP Committee with members with various disability types. Furthermore, as a part of post-election debrief activity, we conduct stakeholder surveys that	In 2022, a decision was made to eliminate the Customer Service Feedback form from the returning offices, advance voting locations and election day voting locations, as it was determined that the feedback form had became obsolete. Almost all feedback from electors was communicated to EO via phone or email, and the realtime monitoring of phone and email channels allowed for more prompt response.  To account for this change,

Section	Requirement	Compliance	2022 Actions
		specifically seek input from persons with disabilities.  Persons with disabilities can also provide real-time feedback in multiple ways, including by phone, email, fax, TTY, mail or through our website.	informational materials were created to assist electors with feedback, and poll officials were trained to direct electors to provide their feedback via email or phone to have their concerns processed by HQ staff in real-time.
12	Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities.	When EO receives requests for a copy of a document in an accessible format or to arrange for a communication support, requests are fulfilled as soon as practicable at a cost that is no more than the regular cost charged to other persons.  We also communicate the availability of accessible formats and communication support to the public on our website.	EO will continue to allow persons with disabilities to use their phones or any other assistive devices to access information or to communicate with election officials.  We will also continue to cover the cost of an American Sign Language or Langue des Signes Québécoise Interpreter or Intervenor.
13	Along with duties under section 12, organizations shall make their	EO makes its emergency procedures, plans and public safety	Should a visitor or the public visit our office facilities and make a request in

Section	Requirement	Compliance	2022 Actions
	emergency procedures, plans and public safety information available in an accessible format or with appropriate communication supports as soon as practicable upon request.	information available to the public via its website that also outlines access availability through accessible formats or with appropriate communication supports upon request and as soon as practicable.	advance for our emergency and safety information, we would provide the information through an accessible format or communication support that works for the individual requesting it.
14	The Government of Ontario and the Legislative Assembly shall make their internet and intranet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA.	EO has stayed on schedule with WCAG 2.0 Level AA compliance dates on January 1st, 2012; January 1st, 2016; and finally, January 1st, 2020, which makes our intranet and internet fully conformed with WCAG 2.0 Level AA.	Content on EO's website meeting AODA standard requirements and WCAG's perceivable, operable, understandable, and robust guidelines is continuously reviewed so that everyone can move through it, including those who use their own assistive software and devices.

# **Employment Standard**

The Employment Standard requires employers to provide accessible accommodation across all stages of the employment life cycle for an employee with a disability. By proactively removing barriers, employers can help to create workplaces that are accessible and that allow employees to reach their full potential. Below are EO's ten legislated requirements:

- 1. Recruitment, assessment, or selection process
- 2. Notice to successful applicants
- 3. Informing employees of supports
- 4. Accessible formats and communication supports for employees
- 5. Workplace emergency response information
- 6. Documented individual accommodation plans
- 7. Return to work process
- 8. Performance management
- 9. Career development and advancement
- 10. Redeployment

A table outlining these requirements and EO's compliance and 2022 actions related to them appears below:

Table 4 - Meeting Requirements

Section	Requirement	Compliance	2022 Actions
22, 23, 24, 25	Every employer shall notify: • 22: employees and the public about the availability of accommodations for applicants with disabilities in	Adhering to the requirements of the Act and the OHRC, we provide accommodations to applicants with disabilities throughout the recruitment and selection process.	EO continues to review all new and revised job descriptions (HQ and field) for content, language, and accessibility before posting.
	its recruitment processes.  • 23: job applicants who are individually selected to participate in an	We provide and incorporate accessibility across all stages of the employment life cycle.  Both internal and external applicants are notified that	In 2022, 94 job postings were created and posted in an accessible format.

Section	Requirement	Compliance	2022 Actions
	assessment or selection process during a recruitment process that accommodations related to the materials or processes used are available upon request.  • 24: The successful applicant of its policies for accommodating employees with disabilities when making offers of employment.  • 25: Its employees of the policies used to support employees with disabilities, including that policies on the provision of job accommodations consider an employee's accessibility needs due to disability.	accommodations are available upon request.  Once an individual is hired, they are asked if they require any accommodations (both day-to-day operations or during an emergency), and, if so, processes are followed to ensure we accommodate the individual's specific needs.  All external facing Human Resources documents have been made accessible. Staff continue to follow EO's Employment Standard procedures to ensure we create an accessible work experience for persons with disabilities.	We also continue to review each new and revised job advertisement for these positions in the same manner and both job advertisements and descriptions will continue to be converted into an accessible Word document and posted as an accessible PDF.  Templates were created so that all future job descriptions and advertisements will be created as an accessible Word document.
26	When an employee with a disability requests it, every employer shall consult with the employee to provide or arrange	EO continues to consult with employees to provide or arrange for the provision of accessible formats and communication supports for information that is	EO's ongoing mission is to create an inclusive environment inside and outside the

Section	Requirement	Compliance	2022 Actions
	for the provision of accessible formats and communication supports for, (a) information that is needed to perform the employee's job. (b) information that is generally available to employees in the workplace.	needed to effectively perform the employee's job, and information that is generally available to other employees in the workplace.  We also continue to consult with the employee making the request in determining the suitability of an accessible format or communication support.	workplace where people feel safe disclosing their disabilities, especially those that are not visible, allowing us to work together to ensure employees with disabilities are equipped with everything they require for optimal and safe job performance.
27	Every employer shall provide individualized workplace emergency response information to an employee with a disability, if the disability is such that the individualized information is necessary, and the employer is aware of the need for accommodation due to the employee's disability.	When EO becomes aware that an employee requires individualized workplace emergency response information and assistance related to their disability, the information is provided as soon as practicable after learning about the need.  A self-assessment containing a list of emergency situations is given to new hires as soon as practicable after the need is disclosed so they can identify what assistance they may need during an emergency.  Human Resources then develops an emergency	EO understands the importance of being aware of the needs that an employee with a disability may have during an emergency and remains fully committed to working together with the employee to prepare for a range of potential emergencies. In 2022, one headquarters employee with disabilities requested a personalized

Section	Requirement	Compliance	2022 Actions
		response plan that is reviewed by the employee to confirm it meets their needs.  The plan is reviewed when an employee moves to a different location or when EO reviews its general emergency response	emergency plan and this request was accommodated.
28	Employers shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	EO continues to follow its written process for developing individual accommodation plans for employees with disabilities who require workplace accommodations once a manager or HR representative is notified that a plan is required.  A highly confidential individual plan is created that includes:  Provision of accessible formats and communication supports  Individualized workplace emergency response information  Any other provided accommodation	EO values each of its employees and will continue to develop written individual accommodation plans for employees that require them.  In 2022, EO supported ten employees with disabilities (3 in HQ and 7 in the field) with individual accommodation plans.
29, 30, 31, 32	An employer shall consider the accessibility needs of employees with disabilities, as well	EO considers the accessibility needs of employees with disabilities, as well as an employee's individual	When using its performance management process, providing career

Section	Requirement	Compliance	2022 Actions
	as individual accommodation plans when:  • 29: Developing a documented return to work process for employees who have been absent from work due to a disability  • 30: Using its performance management process  • 31: Providing career development and advancement  • 32: Redeploying employees with disabilities	accommodation plan when:  Conducting activities related to assessing and improving employee performance, productivity, and effectiveness, with the goal of facilitating employee success  Providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization  Reassigning employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated	development and advancement and redeploying employees with disabilities, EO will continue to consider the accessibility needs of its employees, as well as an employee's individual accommodation plan.

# Design of Public Spaces Standard

The Design of Public Spaces Standard (DPSS) provides requirements to make public spaces that are newly constructed or redeveloped easier for everyone to access.

EO did not create or redevelop any new public spaces in 2022.

A table outlining these requirements and EO's compliance and 2022 actions related to voting locations appears below:

Table 5 - Meeting Requirements

	Deavise and		2022 Astisms
Section	Requirement	Compliance	2022 Actions
80.24 to 80.44	Exterior Paths of Travel:  • 80.24: Ramps  • 80.25: Stairs  • 80.26: Curb ramps  • 80.27: Depressed curbs  Accessible Parking:  • 80.32: Off-street parking  • 80.34: Types of accessible parking spaces  • 80.35: Access aisles  • 80.36: Minimum number & type of accessible parking spaces  • 80.37: Signage  Obtaining Services:  • 80.41: Service counters  • 80.42: Fixed queuing guides  • 80.43: Waiting areas  Maintenance:	We will reference and incorporate the requirements of the DPSS, and the Ontario Building Code should EO build or lease any new buildings for its day-to-day operations or renovate any existing building.  When creating accessible voting locations, we follow EO's Voting Location Inspection Checklist that includes elements of the DPSS. There are mandatory criteria on the Checklist that the location must meet (or	Prior to an electoral event, returning officers evaluate the suitability of each voting location in accordance with the Voting Location Inspection Checklist, which rates, among other criteria, the accessibility of each location.  The list of proposed voting locations was also posted (between December 2 <sup>nd</sup> , 2021, to January 17 <sup>th</sup> , 2022) on EO's website for public feedback on the site selection.  For the 2022 general election, over 7,000 voting locations were inspected to ensure they met EO's Site Accessibility Standards. For some voting locations, remediations had to be made (e.g. installation of ramps) to ensure electors with

Section	Requirement	Compliance	2022 Actions
	• 80.44:     Maintenance of accessible elements	be remediated to meet), including: accessible parking availability; parking space width; width, surface, and slope of exterior and interior pathways; door width, and door hardware; slope, and ramp of hallways etc.	disabilities can easily access the facility.  In total, of the 7,398 voting locations that were ultimately selected for the 2022 general election, 7,176 locations (about 97%) met or exceeded our accessibility criteria.  About 67% of voting locations (4,960) were deemed accessible without any remediation and 30% (2,216) of the locations were made accessible through installation of remediation measures.  During the 2022 general election, directional signage was used to show an alternate or accessible pathway (2,061 signs were posted), and parking cones were used to define accessible parking spaces (5,434 cones were used).  In addition, 283 threshold ramps were used to overcome door thresholds or places where there is a small change in height along the route of travel. 135 suitcase ramps across 41 electoral districts were

Section	Requirement	Compliance	2022 Actions
			used to overcome larger vertical or horizontal gaps. In all, 6,427 different accessibility-related remediation materials were distributed to support the 2022 general election.

# **Exceeding AODA Standard Requirements**

## **New WCAG Guidelines**

Now that EO has successfully met all requirements of the Act to conform with WCAG 2.0 Level AA, we continue to explore meeting guidelines under WCAG 2.0 Level AAA and WCAG 2.1.

#### WCAG 2.0 Level AAA 1.2.7:

• Sign language interpretation is provided for all prerecorded audio content in synchronized media.

#### WCAG 2.1:

Guidelines make websites and web content more accessible to a wider range of persons with disabilities, including enhanced accommodations for:

- Blindness and low vision
- Deafness and hearing loss
- Limited movement
- Speech disabilities
- Photosensitivity
- Some accommodation for learning and cognitive disabilities

## Voting Technology

- Building on our work from past elections, we posted a fully accessible video with accessible voting information in the Accessibility section of our website that was embedded with closed captions, audio description and sign language interpretation.
- Made Assistive Voting Technology (AVT) available at returning and satellite
  offices on voting day for the first time during the 2022 general election.
- For the 2022 general election, EO introduced an online application to apply to vote by mail. The new application allowed electors to apply online to vote by mail and track the status of their voting kit.
- Additionally, in 2022, Elections Ontario launched our pilot for the Elections Ontario application, which included the following accessibility focused features:
  - Personalized notifications to meet individual needs
  - Functionality to leverage personal devices that are already set-up with accessible software

- Digital VICs, which allow electors with visual impairments to access the VIC in format other than paper-based VICs via mail.
- Voting location information that is readily available on any given day

# Health & Safety

- Increasing communication about the measures EO is taking for health and safety in recognition of people who might feel more anxious due to the pandemic.
- Working with the office of the Chief Medical Officer of Health on how we can administer accessible and safe elections and modifying our plans for future elections to protect the health and safety of staff and voters.
- Developing and, if necessary, updating a plan to sanitize all accessibility tools such as AVT, braille/tactile templates, secrecy folders and sharpies after each use.

# **Moving Forward**

#### **MYAP Committee**

In 2022, we held virtual MYAP Committee meetings on March 10<sup>th</sup> and November 10<sup>th</sup>. To address accessibility needs and concerns leading up to, during, and following the 2022 general election, we provided EO app and AVT demonstration video presentations and held a roundtable discussion on members' personal voting experiences and those experiences shared by clients of agencies that support persons with disabilities.

The following summarizes ideas shared and recommendations made during the meetings:

- Continue to test and implement EO app accessibility features using feedback from primary stakeholders to upgrade the app for future events.
- Work on the instruction videos for the EO app to better demonstrate how to scan or upload documents on the app.
- Continued training on poll workers' in-person communication with employees with disabilities so they know how to better engage with electors with several disability types, especially on approach during entry to the voting location.
- Developing an online digital accessibility toolkit for access by electors and poll workers, which includes information such as how to approach voters with varying disability types and use Canadian Hearing Services' technology to access interpreters at polling stations.
- In response to a recommendation to ensure party and politician websites are fully accessible, EO clarified they do not have oversight in this area. However, EO did note that during EO's regular meetings with political stakeholders, we encourage them to provide accessible information and opportunities for persons with disabilities to engage with the political process.

# Increasing Employment Opportunities for Persons with Disabilities

- Continue to consult with the Ontario Disability Employment Network (ODEN) as an umbrella organization that is in touch with the community agencies representing persons with disabilities and share employment opportunities.
  - For the 2022 general election, ODEN posted EO job opportunities in their March 2022 newsletter.

- Continue to review and update the EO website to make it easier to find information about employment opportunities during elections.
- Review and update, if necessary, EO's training content related to accessibility.

# Secretariat for Electoral Coordination Compendium

In keeping with the Secretariat for Electoral Coordination's (SEC) mandate to facilitate collaboration among election management body (EMB) members across Canada (including EO), the SEC created a subcommittee focused on identifying tools and simplifying access to voting for voters with a disability.

In late September 2022, the SEC Steering Committee approved the final version of the *Voters with a Disability Compendium* that provides an overview of legislative requirements, tools, services, and processes used by EMBs across Canada to make voting as accessible as possible. The Compendium is a living document requiring regular content updates by EMBs. It was designed to be used as an internal reference document to identify available resources for voters with a disability and is intended to be used by election officials in federal/provincial/territorial election management bodies in Canada.

The Compendium is currently being translated to French and will be made available through the SEC SharePoint site.

## **AODA Standard Amendments & New Standards**

#### Current AODA standard amendments

The AODA's accessibility standards must be reviewed by the Standards Development Committees (SDCs) that created each standard on five-year intervals. Currently, the Minister for Seniors and Accessibility has approved the final draft of recommendations made by the Customer Service Standard SDC in 2016 and the amendments to the Customer Service Standards in 2016 were incorporated into EO's Customer Service Policy.

The SDC established to review and create recommendations for the Employment Standard released its initial recommendations for public feedback in 2018 and submitted its final draft of recommendations to the Minister for Seniors and Accessibility in early 2019.

The SDC for the Information & Communications Standard released its initial recommendations for public feedback in 2019 and submitted its final draft of recommendations to the Minister for Seniors and Accessibility in early 2020.

In 2021, a SDC was established to review and create recommendations for the Design of Public Spaces Standard and the committee is still working on its initial recommendations.

EO will continue to monitor the status of these standard amendment proposals and ensure that any new amendments to AODA standards are incorporated into EO's policies and procedures in a timely manner. Once the changes are made, EO will notify all staff and external stakeholders.

#### **New Standards:**

EO is also aware of the following new standards that are under development, not all of which will have direct application to EO:

#### Accessible Education

The provincial government has committed to identifying and addressing accessibility barriers in public K-12 and post-secondary college and university education through the creation of two new Education Standards. In 2017 separate K-12 and post-secondary SDCs were established to develop recommendations to address these barriers.

The draft versions of each Standard were released for public feedback during the summer of 2021. In early 2022, each SDC submitted its final recommendations to the Minister for Seniors and Accessibility.

#### Accessible Health Care

The provincial government has also committed to identifying and addressing accessibility barriers in the public health-care sector through the creation of a new Health Care Standard. In 2017 a SDC was established to develop recommendations to address these barriers.

The draft version of the Standard was released for public feedback during the summer of 2021. In early 2022, the SDC submitted its final recommendations to the Minister for Seniors and Accessibility.

EO will also remain diligent in keeping on top of when these or other new standards are enacted and if there are any requirements within them that it must meet.

## Accessible Canada Act

The Accessible Canada Act (ACA - long title: An Act to ensure a barrier-free Canada) came into effect in 2019. It is designed to support the achievement of a fully accessible and inclusive Canada by 2040. The ACA provides a legal framework for making progress on accessibility. It focuses on identifying, removing, and preventing barriers to accessibility in seven key areas:

- 1. employment
- 2. the built environment
- 3. information and communication technologies (ICT)
- 4. communication, other than ICT

- 5. the procurement of goods, services, and facilities
- 6. the design and delivery of programs and services
- 7. transportation

The ACA applies to all federal government departments and agencies, and crown corporations, including:

- banks
- railroads, airlines, and other transportation companies that cross provincial or international borders
- radio and television stations
- cell phone and Internet services

"Nothing Without Us" is a central principle of the Act and it recognizes the lived experience and expertise of persons with disabilities. <u>A Federal Data and Measurement Strategy for Accessibility 2022 to 2027</u> outlines the Acts strategies to reach its goals.

The Accessible Canada Directorate (ACD) in Employment and Social Development Canada (ESDC) is responsible for overall implementation of the Act. This includes measuring progress in the identification, removal, and prevention of barriers by regulated parties and Canadians more generally.

#### ACA & AODA

Accessibility Standards Canada (ASC) has signed two Memoranda of Understanding (MOUs) with the Government of Ontario. The agreements will improve efforts and coordination and facilitate sharing of resources dedicated to creating a Canada without barriers.

The first agreement was signed with the Ministry for Seniors and Accessibility, and it aims to optimize each organization's objectives by reducing or eliminating the duplication of resources and efforts. This could entail information sharing and collaborating on joint research needs.

The second agreement was signed with the Ministry of Municipal Affairs and Housing, and it will specifically focus on the area of the built environment and encourage collaboration on the development of accessibility standards for building codes.

These MOUs encourage parties to consider each other's respective priorities and joint research needs. This may include aligning or harmonizing work on the development, review, and implementation of accessibility standards, where possible, while respecting each jurisdiction's legislative responsibilities for developing accessibility standards.

# In Closing

EO remains committed to ensuring that we identify, remove, and prevent barriers for persons with disabilities to ensure the voting process meets requirements set out in the Act. Making voting easy however warrants going above and beyond legislative requirements and our goal is to provide everyone with the same opportunities to fulfill their democratic right to vote.