

**Accessibility for People with Disabilities Policy**

<b>Date:</b>	January 18, 2010
<b>To:</b>	Toronto Public Library Board
<b>From:</b>	City Librarian

**SUMMARY**

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The purpose of this report is to present the Toronto Public Library Accessibility for People with Disabilities Policy for approval. This policy was developed as a response to the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”) and the Accessibility Standards for Customer Service regulation (Ontario Regulation 429/07) (“Customer Service Standard”). The policy will be revised as needed when regulatory standards on information and communication, employment and the built environment are introduced.

The report also presents, for the Board’s information, an outline of consultations that have taken place in relation to this policy and plans for future consultations on the upcoming regulatory standards. Consultations will provide an opportunity for the Library to engage residents, advocacy groups and to encourage broader participation.

**RECOMMENDATIONS**

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**The City Librarian recommends that the Toronto Public Library Board:**

1. approves the Accessibility for People with Disabilities Policy as provided in Attachment 1.

**Implementation Points**

The Library will make documentation on the Library’s policies, practices and procedures related to accessibility issues available on the website. When requested, this documentation will also be made available in an agreed upon alternate format that meets the needs of the requester’s disability.

The Library will continue to consult with stakeholders in developing practices and procedures that will further the goal of providing accessible library services to people with disabilities.

## **FINANCIAL IMPACT**

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AODA will have a future financial impact on the Library, but until standards are enacted, regulations developed and compliance timelines defined, it is not possible to quantify with certainty what that impact will be. As they are written now, two of the standards would have significant financial impact on TPL.

To meet the proposed Built Environment standard, it has been estimated using tools provided by the government, that the cost to TPL over five years could be as much as \$46 million for the retrofit of existing buildings and an additional \$3.5 million premium on new construction which could not be accommodated in the Library's current capital budget.

The Information and Communications Standard may result in financial impacts for collections and information technology.

The Director, Finance & Treasurer has reviewed this financial impact statement and is in agreement with it.

## **DECISION HISTORY**

The Accessibility Standards for Customer Service regulation was adopted on January 1, 2008, but came into effect for designated public sector organizations on January 1, 2010.

At the October 19, 2009 Board meeting, the Board was presented with a staff report (<http://www.torontopubliclibrary.ca/pdfs/board/09oct19/14.pdf>). The report provided a comprehensive overview of the legislation, current and upcoming regulations and the available services provided by the Library for persons with disabilities.

At the October 19, 2009 meeting, the Board directed staff "to consult with people with disabilities in the formulation of a policy for services for people with disabilities."

## **ISSUE BACKGROUND**

TPL's commitment to accessible buildings, services and collections is well established. Specialized services are available such as the Centre for People with Disabilities located at Toronto Reference Library, the Home Library Service and Talking Books collections. All branches have a basic range of adaptive equipment, and all capital building projects include upgrading to add accessibility features. A variety of accessible formats are purchased for library collections and the Library website is built to meet W3C accessibility standards.

The *Accessibility for Ontarians with Disabilities Act* and associated standards further the Library's mission to deliver services in a welcoming and supportive environment and support the Library's core value of equity which is defined as accessibility, diversity and fairness in the treatment of all individuals. The Accessibility for People with Disabilities

Policy is being presented to the Board to ensure that the Library is in compliance with the Customer Service Standard. This, and other, Library policies will be revised as needed when regulatory standards on information and communication, employment and the built environment are introduced.

## COMMENTS

### Accessibility for People with Disabilities – Customer Service Standard Policy

As detailed in the October 19, 2009 report, the regulation places eleven general requirements and three additional requirements for public sector organizations including the Library. The following chart lists each requirement and which aspects of the policy address those requirements. Additional procedure or practice details are included where appropriate.

	General Requirements	Policy Section
1.	Establishment of policies on providing services to people with disabilities	Policy as a whole meets this requirement
2.	Ensure policies are consistent with principles of independence, dignity, integration and equality of opportunity	Principles are contained in the Policy Statement
3.	Assistive devices	Section 9.0
4.	Communicating in a manner that takes into account a person's disability	Section 2.0
5.	Service animals	Section 7.0
6.	Support persons	Section 8.0
7.	Admission fees for support persons	Section 8.0
8.	Notices of disruption to facilities or services	Section 10.0
9.	Training staff, volunteer and contractor who interact with the public	Section 3.0
10.	Training staff who develop policies and procedures	Section 3.0  Note that in addition to the recent on-line training session offered at the December 16 Board meeting, training CDs are available.
11.	Feedback mechanism for customers	Section 4.0  Procedure - The Library's feedback response procedure will continue to apply

	<b>Requirements for Organizations with 20 or more Employees</b>	<b>Policy Section</b>
1.	Documentation of policies and procedures for providing accessible customer service	Section 11.0
2.	Notify customers that documentation of policies and procedures are available upon request	Section 11.0
3.	Documentation of policies and procedures are in a format that accounts for a person's disability	Section 11.0  Practice - availability of the documentation will be posted on the web and through in-branch signage

This policy will be reviewed regularly to ensure that it complies with the law and supports the accessibility of library services and programs.

### **Public Consultations**

The *Accessibility for Ontarians with Disabilities Act, 2005* represents an opportunity for the Library to consult with stakeholders on the development of policies, practices and procedures that further the goal of providing barrier-free access to library services.

Consistent with the direction given by the Board, and with the Public Consultation Policy, staff developed a plan to consult with key stakeholders. The plan will be used to consult the public on all five regulatory standards.

The goals of the plan are to:

- provide the public and staff with ongoing opportunities to participate in the development of policies related to accessibility;
- develop policies and practices that meet legislative requirements;
- help the Library understand the needs and concerns of people with disabilities;
- build better strategies and services to improve accessibility;
- build partnerships, community engagement and usership of services;
- improve the Library's understanding of effective engagement with people with disabilities;
- identify residents, stakeholders and staff interested in participating in future consultations.

The Library is conducting a two-phase consultation. The purpose of phase one consultation is to obtain feedback on the Library's draft policy, Accessibility for Persons with Disabilities, and to learn who would be interested in participating in future consultations on Library accessibility. Phase one of the consultations began in the first

week of December 2009. For those wanting to comment on the initial policy, the Library requested that responses be received by January 4, 2010. Comments received after that date will be considered as the policy is revised to accommodate new standards as they are implemented. Customer feedback is always welcome, and collections, programs and services are adjusted based on these ideas and suggestions.

Library users were consulted through the following methods:

- the policy was posted on the Library website with an email address for users to provide comments;
- a comment form was sent to all Library branches to share with groups and individuals who may benefit from increased accessibility at the Library;
- an email or letter was sent to Home Library and Talking Book Clients and special needs clients who are regular users – representing over 50% of those registered with special needs status – requesting feedback. Over 100 users were directly contacted;
- the policy and comment form was also made available in alternative formats in the Centre for Disabilities at the Toronto Reference Library;
- an email was sent to agencies serving people with disabilities inviting them to respond directly and/or share the policy with their clients. A list of over 140 stakeholders, including those who participated in the Strategic Plan consultations, was used to contact and invite to participate in phase one and two of the consultations.

The policy was well received with respondents stating that they were pleased to have the opportunity to examine the policy and to offer comments. Respondents also made suggestions that staff utilize the expertise of persons with disabilities, and also made suggestions for additional training and programming.

Phase two of the consultations will be conducted from January to June 2010. The Library will interview library users and stakeholders groups in person and hold meetings at Library branches to consult with stakeholders as other provincial accessibility standards are released.

## **CONTACT**

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## **SIGNATURE**

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Jane Pyper  
City Librarian

## **ATTACHMENTS**

Attachment 1: Accessibility for People with Disabilities Policy