

## **Accessibility for Persons with Disabilities Policy - Revised**

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|--------------|------------------------------|
| <b>Date:</b> | December 6, 2021             |
| <b>To:</b>   | Toronto Public Library Board |
| <b>From:</b> | City Librarian               |

### **SUMMARY**

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The purpose of this report is to seek Toronto Public Library Board approval of the revisions to the Accessibility for Persons with Disabilities Policy. The policy has been revised to ensure the Library maintains its compliance with the legislative amendments under the Integrated Accessibility Standards Regulation (IASR) (O. Reg. 191/11) under the Accessibility for Ontarians with Disabilities Act (AODA) and to ensure an organization-wide perspective.

The policy revisions ensure continued support for the individual accessibility needs of our employees and customers with disabilities, while at the same time upholding the Library's commitment to providing equitable access to its services, programs, employment opportunities, and facilities.

### **RECOMMENDATIONS**

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

1. approve the revised Accessibility for Persons with Disabilities Policy, as outlined in attachment 1 of this report

### **FINANCIAL IMPACT**

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Aside from the cost of providing requested accessible formats and communication supports, there will be no financial impacts associated with the revised policy.

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

## **ALIGNMENT WITH STRATEGIC PLAN**

The revised Accessibility for Persons with Disabilities Policy aligns closely with the Library's strategic pillars of a democratic society and public service excellence. It also aligns with the focus on fostering diversity amongst staff and ensuring that staff understand and are responsive to the unique needs of individuals and communities.

## **EQUITY IMPACT STATEMENT**

The revised Accessibility for Persons with Disabilities Policy will have a positive impact on persons with disabilities. By adopting this policy, the Library will continue to support its employees and customers with disabilities by reaffirming its commitment to providing equitable access to TPL's services, programs, employment practices, and facilities.

## **DECISION HISTORY**

At its January 18, 2010 meeting, the Library Board approved the Accessibility for Persons with Disabilities Policy in response to the requirements under the Accessibility for Ontarians with Disabilities Act, 2005 ("AODA") and the Accessibility Standards for Customer Service.

<https://www.torontopubliclibrary.ca/content/about-the-library/pdfs/board/meetings/2010/jan18/12.pdf>

At its March 27, 2013 meeting, the Library Board approved revisions to the policy to incorporate new regulations.

<https://www.torontopubliclibrary.ca/content/about-the-library/pdfs/board/meetings/2013/mar27/11.pdf>

The policy has now been revised to reflect recent legislative amendments and a shift in its approach from public service to an organization-wide perspective.

## **ISSUE BACKGROUND**

In 2005, the Government of Ontario enacted the Accessibility for Ontarians with Disabilities Act (AODA). The goal of the AODA is for Ontario to be accessible by 2025, by

removing and preventing barriers so that people with disabilities can participate more fully in their communities.

To achieve this goal, accessibility standards were developed and enacted in the following areas:

- Customer Service
- Employment
- Information and Communications
- Transportation
- Built Environment

In 2007, the Accessibility Standards for Customer Service (O. Reg. 429/07 under the AODA) were enacted. Under these standards, the Library was required to establish an Accessible Customer Service policy. In response, the Accessibility for Persons with Disabilities policy was developed and approved by the Board in 2010, and revised in 2013.

In 2011, the general requirements and the accessibility standards for information and communications, employment, and transportation were harmonized into one regulation under the AODA. This regulation is known as the Integrated Accessibility Standards Regulation (IASR).

In 2016, the Accessibility Standards for Customer Service were amended and incorporated into the IASR. The most significant amendments to these standards related to service animals and support persons.

All five of the accessibility standards now reside under the IASR. To ensure the Library continues to meet and maintain all of its compliance requirements, we must ensure our policy reflects all aspects of the legislation.

## **COMMENTS**

The revised policy reflects recent amendments to the Accessible Customer Service Standards and includes legislated clauses from the IASR that are not addressed in the current policy such as those related to our multi-year accessibility plan, the provision of health and safety information in accessible formats upon request, and newly constructed and renovated facilities. In addition, the overall approach of the revised policy has been expanded, from public-facing customer service to a broader organizational perspective.

By grouping clauses under their respective set of accessibility standards, the policy's structure has been updated to align with the structure of the IASR. Additional sections have been added and updated.

## **CONTACT**

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## **SIGNATURE**

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Vickery Bowles  
City Librarian

## **ATTACHMENTS**

Attachment 1: Accessibility for Persons with Disabilities Policy-Revised  
Attachment 2: Accessibility for Persons with Disabilities Policy - Revised –redlined

Policy Title:  
Policy Classification: Board Policy

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## **Accessibility for Persons with Disabilities Policy**

**POLICY CLASSIFICATION: BOARD POLICY**

**MOTION# and APPROVAL DATE: 10-013 – January 18, 2010**

**MOTION# and LAST REVISION DATE:**

**13-049 – March 27, 2013**

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### **Effective Date**

December 6, 2021

### **Last Reviewed**

December 6, 2021

### **Purpose**

The goal of this policy is to ensure that Toronto Public Library (“the Library” or “TPL”) meets or exceeds the compliance requirements set by the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and the Integrated Accessibility Standards Regulation (IASR).

The objective is to provide an accessible, equitable, and inclusive work environment for its employees and Library services to its customers.

### **Scope**

The Accessibility for Persons with Disabilities Policy (“the Policy”) applies to all aspects of the Library’s operations, including its services and facilities, information and communications, technology, and employment opportunities. It further

Accessibility for Persons with Disabilities Policy

applies to all staff, at all levels of the Library.

## **Underlying Principles**

Toronto Public Library's Accessibility for Persons with Disabilities Policy is founded on the following underlying principles:

- TPL is committed to implementing the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), along with the Integrated Accessibility Standards Regulation (IASR);
- TPL's implementation of the accessibility legislation will be in alignment with the Library's mission, vision, and values, including the values of equity, inclusion, and diversity;
- TPL acknowledges that accessibility is a shared responsibility between all Library users, including staff, customers, contractors, vendors, and the general public; and
- TPL upholds the principles of accessibility, including dignity, independence, integration, and equal opportunity, which will be reflected in all aspects of the Library.

## **Policy Statement**

Toronto Public Library is committed to providing an open, accessible, and equitable environment that meets the changing needs of its employees and customers, including persons with disabilities, in a welcoming and supportive environment.

The Library will develop and support a work and service environment where the needs of persons with disabilities are addressed in accordance with the principles of dignity, independence, equal opportunity, and integration.

In accordance with its vision, mission, and values, the Library is guided by the

Accessibility for Persons with Disabilities Policy

service values of equity and diversity in the treatment of its employees and customers. TPL will meet or exceed the standards set by the AODA and the IASR.

The Library will establish, implement and monitor policies, services, and practices that balance the needs of persons with disabilities and others to support the accessibility standards of customer service, information and communication, employment and the built environment established under the AODA.

## **1.0 General Requirements**

### **1.1 Library Policies**

Library policies will be applied in a manner that considers the individual accessibility needs of persons with disabilities and respects the principles of dignity, independence, equal opportunity, and integration.

### **1.2 Multi-Year Accessibility Plan**

The Library will establish, deliver, and maintain a Multi-Year Accessibility Plan (MYAP). The MYAP outlines the projects and initiatives that will be developed and implemented to identify, remove, and prevent systemic accessibility barriers and meet its legislated compliance obligations under the IASR.

The MYAP will be developed in consultation with internal and external stakeholders, including persons with disabilities, and posted to the Library's external website. The Library will also prepare an annual status report on its Multi-Year Accessibility Plan, and post these reports to its external website. The MYAP and status reports will be provided in an accessible format upon request.

The Multi-Year Accessibility Plan will be updated at the same time, and span the same number of years, as the Library's Corporate Strategic Plan.

### **1.3 Procurement**

The Library will incorporate accessibility criteria and features into the procurement

of any goods, products, or services, obtained through a formal contract or agreement with a third-party, except where it is determined to be not practicable as defined within the IASR.

The Library will also incorporate accessibility features and criteria when designing, procuring or acquiring self-service kiosks such as self-check-out terminals.

In the event where it is not practicable to procure accessible goods, products, services, or self-serve kiosks, staff will document the reason within any files and reports related to the project.

## **1.4 Training**

The Library will provide and document ongoing training on the Integrated Accessibility Standards Regulation and the Ontario Human Rights Code, as it relates to persons with disabilities, to its employees, volunteers, and third-party contractors conducting business on behalf of the Library.

As part of its accessibility training, the Library will include information on providing accessible customer service to persons with disabilities, including, but not limited to, the use of assistive devices within its branches and facilities, and accessing its goods and services.

## **2.0 Information and Communication**

The Library will communicate with, and provide information to, its employees and customers with disabilities in a manner that takes into account their individual accessibility needs.

### **2.1 Accessible Websites and Web Content**

The Library will ensure its external website, web content, and any web-based applications, developed internally or procured through a third party, comply with all applicable level AA success criteria established under the Web Content Accessibility Guidelines 2.0 (WCAG).

## **2.2 Accessible Formats & Communication Supports**

The Library will provide accessible formats and communication supports to its employees and customers with disabilities upon request, in a timely manner, and at no additional cost to the individual.

The Library will inform its employees and customers of the availability of accessible formats and communication supports on its website and any internal and external documents related to a meeting, program, employment opportunity, and/or event.

## **2.3 Feedback Process**

The Library welcomes continuous feedback from persons with disabilities on the accessibility of its goods, services, programs, and facilities. The Library will accept feedback in a variety of accessible manners, including phone, email, TTY, and its online feedback form, and will communicate with its staff and customers with disabilities in a manner that meets their individual accessibility needs.

Responses to customer feedback will be sent within 48 hours, in accordance with the Library's [Customer Feedback Standard](#).

## **2.4 Emergency Procedures, Plans, & Safety Information**

The Library will provide its emergency procedures, plans, and health and safety information, that it makes available to the public, to persons with disabilities in an accessible format or with an appropriate communication support upon request.

## **2.5 Public Libraries**

The Library will provide equitable access to reading and learning materials in accessible formats, where they exist, to its employees and customers with disabilities, including archival materials and special collections.

The Library will inform the public, through its external website, of the availability of

accessible materials and any additional accessibility services offered within its branches and facilities for persons with disabilities.

### **3.0 Customer Service**

In keeping with the Library's commitment of providing free, equitable, and accessible service in a welcoming and supportive environment, the Library will:

- Provide services in a manner that respects the dignity, integrity, and independence of persons with disabilities, and provides equal opportunities to learn about, use, and benefit from library services.
- Integrate services for persons with disabilities. The Library understands that equitable access may require separate or specialized services and equipment/technology. Such services will be offered in a manner that respects the full participation of persons with disabilities.

### **3.1 Service Animals**

The Library welcomes service animals, within its branches, facilities, and Book Mobile vehicles, that are needed to assist persons with disabilities.

Persons with disabilities, accompanied by a service animal, shall be permitted to enter a library branch, facility, or Book Mobile vehicle, and shall not be separated from their service animal unless the animal is otherwise excluded from the premises by law.

If a service animal is excluded from entering its premises by law, the Library will ensure the person with a disability can perform the duties of their employment and/or access our goods, services, programs, and facilities in a manner that meets their individual accessibility needs.

While accessing the Library's premises or performing the duties of their employment, the person with a disability is responsible for ensuring their service animal is clearly identified by a vest, harness, or documentation provided by the

individual, and that the animal behaves in a professional manner.

### **3.2 Support Persons**

The Library welcomes persons with disabilities and their accompanying support persons within its branches, facilities, and Book Mobile vehicles. If discussing personal or confidential information, staff will ask the person with a disability if they prefer their support person to remain present.

While accessing the Library's premises, or performing the duties of their employment, the person with a disability shall be permitted to remain with their support person at all times.

In the event where an admission fee is charged for a library program, service, or event, this fee will be waived for support persons, or advanced notice will be given of any admission fees related to support persons.

### **3.3 Assistive Devices**

The Library supports the use of assistive devices that enable persons with disabilities to use the Library's goods, services, and facilities. The Library will offer a broad range of assistive devices, including communication supports, to help meet the reading and learning needs of persons with disabilities.

The Library also recognizes that equitable service can be achieved by supporting the person's individual accessibility needs. Customers with disabilities may use personal assistive devices while accessing the Library.

### **3.4 Notice of Temporary Service Disruptions**

In the event of a scheduled service disruption to its goods, services, or facilities, the Library will notify its employees and customers of this disruption at least 48 hours prior to its planned start date and time. The notice should include the reason for the disruption, how long the disruption will last, and a description of

available alternatives, if any.

In the event of an unplanned disruption, notice will be provided as quickly as possible through the Library's internal and external communication channels.

### **3.5 Accessibility Accommodations for Persons with Disabilities**

The Library will provide accessibility accommodations, upon request, as required under the Ontario Human Rights Code, to its employees and customers with disabilities.

When a request for an accessibility accommodation is received, the Library has a legal duty to provide the requested accommodation in a timely manner that respects the dignity, integrity, independence, and individual accessibility needs of the person.

## **4.0 Employment**

### **4.1 Recruitment and Hiring Process**

The Library will incorporate the requirements, established under the Accessible Employment Standards, into its recruitment and hiring practices and procedures, including, but not limited to, the provision of accessible formats and communication supports upon request for candidates with disabilities throughout the entire hiring process.

### **4.2 Workplace Emergency Response Information**

The Library will provide its employees with disabilities with workplace emergency response information. Upon consultation with the employee and their direct supervisor, this information will be delivered in a manner that takes into account the employee's individual accessibility needs.

### **4.3 Documented Individualized Accommodation Plans**

The Library will establish a process for the development of documented

individualized accommodation plans for its employees with disabilities.

In consultation with the employee, their direct supervisor, and union representative, if applicable, the Plan will document the workplace accommodations that will be required by the employee to perform the duties of their role at the Library.

#### **4.4 Return to Work Process**

When absent from work due to a disability, the Library will adhere to its return to work process, as outlined in its Collective Agreement, for its employees, including the provision of accessibility accommodations if required.

The process referenced in this section does not replace or supersede an existing return to work process created, or mandated, under another statute. Rather, it will support the successful return to work of all employees.

#### **4.5 Performance Management**

The Library, throughout its performance management process, will take into account the individual accessibility needs of its employees with disabilities and their documented accommodation plan, if one has been established.

#### **4.6 Career Development & Advancement**

When establishing policies, programs, or strategies that support the career development and advancement of its employees, the Library will take into account the individual accessibility needs of its employees with disabilities, and their documented accommodation plan if one has been established.

#### **4.7 Position & Location Changes**

When transferring or relocating employees with disabilities to a new work location or position, the Library will take into account their individual accessibility needs, as well as their documented accommodation plan if one has been established.

## 5.0 Built Environment & Public Spaces

When designing newly constructed or renovated branches or facilities, the Library will incorporate the requirements established under the City of Toronto's Accessibility Design Guidelines (TADG).

The TADG serves as a guiding set of standards that aims to meet and exceed the [Ontario Building Code](#) Barrier-Free design requirements and the technical requirements under the [AODA Design of Public Spaces Standards](#).

When conducting public consultations on a newly constructed or renovated branch or facility, the Library will hold such consultations in an accessible venue and location, include people with disabilities, and provide any related documents in an accessible format or through an appropriate communication support upon request.

### Accountability

The City Librarian and Directors are responsible for the implementation of this policy.

The Director, Human Resources, through the Manager, Accessibility, is responsible for monitoring, analyzing, and reporting on any amendments made to the Standards under the IASR.

The Library is responsible for reporting to the Ministry for Seniors and Accessibility every three (3) years on its compliance with the requirements under the IASR.

### Related Legislation

- [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#)
- [City of Toronto Corporate Accessibility Policy](#)
- [City of Toronto Accessibility Design Guidelines](#)
- [Integrated Accessibility Standards Regulation \(IASR\)](#)
- [Ontario Building Code](#)
- [Ontario Human Rights Code](#)

- [Web Content Accessibility Guidelines \(WCAG\)](#)

## Definitions

**Accessible Formats:** Accessible formats, sometimes called alternate formats, are ways of presenting printed, written, or visual material so that people with print disabilities can access it. People with print disabilities may:

- Be blind or live with low vision
- Have a learning disability that affects reading
- Have a physical disability and be unable to hold or turn pages

Accessible formats may include, but are not limited to:

- Plain language
- Large print
- Braille
- Electronic (MS Office, Rich Text, or PDF)
- Audio

**Assistive Device:** An assistive device is a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities such as moving, communicating or lifting. Examples include, walkers, magnifiers for reading, computer hardware and software, white canes, wheelchairs, scooters, and smart phones or tablets.

**Barrier:** A barrier is any systemic, attitudinal, technological, informational, or architectural limitation that prevents someone from participating fully in society due to their disability.

**Communication Supports:** Communication supports are ways for people who cannot access verbal or audio information to receive it visually or ways for people who are non-verbal to communicate with people who speak. For instance, people who do not understand verbal communication may:

- Be Deaf, deafened, or hard of hearing
- Be Deaf/blind

Some common communication supports include:

**American Sign Language (ASL):** American Sign Language (ASL) is a complete, natural language that has the same linguistic properties as spoken languages, with grammar that differs from English. ASL is expressed by movements of the hands and face. It is the primary language of many North Americans who are Deaf, deafened, oral deaf, and hard of hearing, and is used by many hearing people as well.

**Note: The ‘uppercase D’ in the word Deaf is used to describe people who identify as culturally Deaf to reflect their participation and belonging in Deaf Culture. The “lowercase d” in the word deaf refers to the physical condition of not hearing.**

**Communication Access Real-Time Translation (live captioning):**

Communication Access Real-Time Translation (CART) is the live, word-for-word transcription of speech to text so that individuals who are Deaf, deafened, oral deaf, or hard-of-hearing can read what is being said in meetings, events, or at personal appointments on a laptop or a larger screen. CART services can be provided on-site or remotely, in both English and French, via a secure website.

**Langue des signes du Québec (LSQ):** Quebec Sign Language, known in French as Langue des signes québécoise or Langue des signes du Québec (LSQ), is the predominant sign language of Deaf communities used in francophone Canada, primarily in Quebec.

**Deaf Interpreter:** A Deaf Interpreter (DI) is a specialist who provides interpreting services in American Sign Language (ASL), Langues des signes québécoise (LSQ), and other visual and tactual communication forms used by individuals who are Deaf, hard of hearing, and deafblind.

As a person who is Deaf, the Deaf Interpreter starts with a distinct set of formative linguistic, cultural, and life experiences that enables nuanced comprehension and interaction in a wide range of visual language and communication forms, which are influenced by region, culture, age, literacy, education, class, and physical, cognitive, and mental health. These experiences, coupled with professional training, give the Deaf interpreter the ability to effect successful communication across all types of interpreted interactions, both routine and high risk.

**Intervener:** An intervener is a trained professional who acts as the “eyes” and “ears” of a person who is deafblind, providing specialized communications services and supports.

**Disability:** As defined in the AODA, disability means:

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*; (“handicap”)

**Kiosk:**

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.

**Service Animal:** A service animal means any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, episodic, intellectual, or a mental health disability. Tasks performed can include, among other things, guiding, pulling a wheelchair, retrieving dropped items, alerting a person to a sound, reminding a person to take medication, or pressing an elevator button.

**Support Person:** In relation to a person with a disability, another person who accompanies the individual with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

### **Enquiries**

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Policy Title:  
Policy Classification: Board Policy

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## **Accessibility for Persons with Disabilities Policy**

**POLICY CLASSIFICATION: BOARD POLICY**

**MOTION# and APPROVAL DATE: 10-013 – January 18, 2010**

**MOTION# and LAST REVISION DATE:**

**13-049 – March 27, 2013**

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### **Effective Date**

**December 6, 2021** ~~March 27, 2013~~

### **Last Reviewed**

December 6, 2021

### **Purpose**

The goal of this policy is to ensure that Toronto Public Library (“the Library” or “TPL”) meets or exceeds the compliance requirements set by the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Integrated Accessibility Standards Regulation (IASR).

The objective is to provide an accessible, equitable, and inclusive work environment for its employees and Library services to its customers.

### **Scope**

The Accessibility for Persons with Disabilities Policy (“the Policy”) applies to all aspects of the Library’s operations, including its services and facilities, information and communications, technology, and employment opportunities. It further

Accessibility for Persons with Disabilities Policy

applies to all staff, at all levels of the Library.

## **Underlying Principles**

Toronto Public Library's Accessibility for Persons with Disabilities Policy is founded on the following underlying principles:

- TPL is committed to implementing the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), along with the Integrated Accessibility Standards Regulation (IASR);
- TPL's implementation of the accessibility legislation will be in alignment with the Library's mission, vision, and values, including the values of equity, inclusion, and diversity;
- TPL acknowledges that accessibility is a shared responsibility between all Library users, including staff, customers, contractors, vendors, and the general public; and
- TPL upholds the principles of accessibility, including dignity, independence, integration, and equal opportunity, which will be reflected in all aspects of the Library.

## **Policy Statement**

Toronto Public Library is committed to providing an open, accessible, and equitable environment that meets the changing needs of its employees and customers, including persons with disabilities, in a welcoming and supportive environment.

The Library will develop and support a work and service environment where the needs of persons with disabilities are addressed in accordance with the principles of dignity, independence, equal opportunity, and integration.

In accordance with its vision, mission, and values, the Library is guided by the

Accessibility for Persons with Disabilities Policy

service values of equity and diversity in the treatment of its employees and customers. TPL will meet or exceed the standards set by the AODA and the IASR.

The Library will establish, implement and monitor policies, services, and practices that balance the needs of persons with disabilities and others to support the accessibility standards of customer service, information and communication, employment and the built environment established under the AODA.

### **Policy Objective**

~~The goal of this policy is to ensure that Toronto Public Library meets or exceeds the standards set by the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Integrated Accessibility Standards Regulation (IASR), and provides an accessible, equitable, and inclusive work environment for its employees, and library services to its customers.~~

### **Statement of Commitment and Policy**

~~Toronto Public Library is committed to providing an open, accessible, and equitable environment access to library service that meets the changing needs of its employees and customers of all Torontonians, including persons with disabilities, in a welcoming and supportive environment. The Library will develop and support a work and service environment where the needs of persons with disabilities are addressed in accordance with the principles of dignity, independence, equal opportunity, and integration. Toronto Public Library will meet or exceed the standards set by the AODA and the IASR its regulations.~~

~~In accordance with its vision, mission, and values, the Library is guided by the service values of equity and diversity in the treatment of its employees and customers. The Library will make reasonable effort to establish, implement and monitor policies, services and practices that balance the needs of persons with disabilities and others to support the accessibility standards of customer service, information and communication, employment and the built environment established under the AODA.~~

### **Scope**

~~This policy applies to all aspects the planning and delivery of the Library's daily operations, including its services and facilities, information, communications, and technology, and employment opportunities. operations, services and programs provided by Toronto Public Library. It further applies to all staff, at all levels of the organization.~~

## 1.0 General Requirements

### 1.1 Library Policies

Library policies will be applied in a manner that considers the individual needs of persons with disabilities and respects the principles of dignity, independence, equal opportunity, and integration.

### 1.2 Multi-Year Accessibility Plan

The Library will establish, deliver, and maintain a Multi-Year Accessibility Plan (MYAP). The MYAP outlines the projects and initiatives that will be developed and implemented to identify, remove, and prevent systemic accessibility barriers and meet its legislated compliance obligations under the IASR.

The MYAP will be developed in consultation with internal and external stakeholders, including persons with disabilities, and posted to the Library's external website. The Library will also prepare an annual status report on its Multi-Year Accessibility Plan, and post these reports to its external website. The MYAP and status reports will be provided in an accessible format upon request.

The Multi-Year Accessibility Plan will be updated at the same time, and span the same number of years, as the Library's Corporate Strategic Plan.

### 1.3 Procurement

The Library will incorporate accessibility criteria and features into the procurement of any goods, products, or services, obtained through a formal contract or agreement with a third-party, except where it is determined to be not practical as defined within the IASR.

The Library will also incorporate accessibility features and criteria when designing, procuring or acquiring self-service kiosks [such as self-check out terminals](#).

[In the event where it is not practicable to procure accessible goods, products,](#)

services, or self-serve kiosks, staff will document the reason within any files and reports related to the project.

#### **1.4 Training for Staff and Volunteers**

The Library will provide and document ongoing training on the ~~AODA legislation~~ Integrated Accessibility Standards Regulation and the Ontario Human Rights Code, as it relates to persons with disabilities, ~~requirements for~~ to its employees, volunteers and third-party contractors conducting business on behalf of the Library. ~~interact with the public or who participate in the development of policies on behalf of the Library.~~

As part of its accessibility training, the Library will include information on providing accessible customer service to persons with disabilities, including, but not limited to, the use of assistive devices within its branches and facilities, and accessing its goods and services.

### **2.0 Information and Communication**

The Library will communicate with, and provide information to, its employees and customers with disabilities in a manner that takes into account their individual accessibility needs.

#### **2.1 Accessible Websites and Web Content**

The Library will ensure its website, web content, and any web-based applications, developed internally or procured through a third party, will comply with all applicable level AA success criteria established under the Web Content Accessibility Guidelines 2.0 (WCAG).

#### **2.2 Accessible Formats and Communication Supports Materials**

The Library will provide accessible formats and communication supports to persons with disabilities upon request, in a timely manner, and at no additional cost to the individual. ~~access to materials in accessible formats where materials~~

~~exist.~~

## **2.3 Feedback Process**

The Library welcomes continuous feedback from persons with disabilities on the accessibility of its goods, services, programs, and facilities. ~~and makes information on how to provide feedback available in accessible format. Staff assistance is available to support all residents, including persons with disabilities, in providing feedback and~~ The Library, when requested, will accept feedback in a variety of accessible manners, including phone, email, TTY, and its online feedback form, and will ~~make a reasonable effort to~~ communicate with staff and customers in an accessible format of their choice.

Responses to customer feedback will be sent within 48 hours ~~in a timely manner,~~ in accordance with the Library's [Customer Feedback Standard](#).

## **2.4 Emergency Procedures, Plans, & Safety Information**

The Library will provide its emergency procedures, plans, and health and safety information, that it makes available to the public, to persons with disabilities in an accessible format or with an appropriate communication support upon request.

## **2.5 Public Libraries**

The Library will provide equitable access to reading and learning materials in accessible formats, where they exist, to its employees and customers with disabilities, including archival materials and special collections.

The Library will inform the public, through its external website, of the availability of accessible materials and any additional accessibility services offered within its branches and facilities for persons with disabilities.

## **~~3.0 Training for Staff and Volunteers~~**

~~The Library will provide and document ongoing training on the AODA legislation~~

~~Integrated Accessibility Standards Regulation and the Ontario Human Rights Code, as it relates to persons with disabilities, requirements for to its employees, volunteers and third party contractors conducting business on behalf of the Library, interact with the public or who participate in the development of policies on behalf of the Library.~~

#### ~~4.0 — Requests for Accessibility Accommodations for Employees and Customers under the Ontario Human Rights Code~~

~~The Library will continue to provide accessibility accommodations, meet the standards set by as required under the Ontario Human Rights Code (“Code”) to its employees and customers. Where a request for accommodation is made, the Library will strive to provide accommodation in a way that most respects the dignity of the person. The Library recognizes that persons with disabilities may require individualized accommodation and that each person’s needs are unique. Accommodation will be provided unless the Library experiences “undue hardship” as defined in the Code.~~

### 3.0 Customer Service

In keeping with the Library’s commitment of providing free, equitable, and accessible service in a welcoming and supportive environment, the Library will:

- Provide services in a manner that respects the dignity, integrity, and independence of persons with disabilities, and provides them with an equal opportunities to learn about, use, and benefit from library services.
- Integrate services for persons with disabilities. The Library understands that equitable access may require sometimes requires different treatment including separate or specialized services and equipment/technology. However, such services will be offered in a way that respects the full participation of persons with disabilities.

#### 3.1 Service Animals

The Library welcomes service animals, [within its branches, facilities, and Book Mobile vehicles](#), that are needed to assist persons with disabilities.

Persons with disabilities, accompanied by a service animal, shall be permitted to enter a library branch, facility, or Book Mobile vehicle, and shall not be separated from their service animal unless the animal is otherwise excluded from the premises by law.

If a service animal is excluded from entering its premises by law, the Library will ensure the person with a disability can perform the duties of their employment and/or access our goods, services, programs, and facilities in a manner that meets their individual accessibility needs.

While accessing the Library's premises or performing the duties of their employment, the person with a disability is responsible for ensuring their service animal is clearly identified by a vest, harness, or documentation provided by the individual, and that the animal behaves in a professional manner.

### **3.2 Support Persons**

The Library welcomes persons with disabilities and their accompanying support persons. If discussing personal or confidential information, staff will ask the person with a disability if they prefer their support person to remain present.

While accessing the Library's premises, or performing the duties of their employment, the person with a disability shall be permitted to remain with their support person at all times.

~~In most cases, the Library does not charge admission for the programs, services, and events that it offers. However, when~~ In the event where an admission fee is charged for a library program, service, or event, this fee will be waived for support persons, or advanced notice will be given of any admission fees related to support persons.

### **3.3 Assistive Devices**

The Library will ~~make reasonable efforts to~~ support the use of assistive devices that enable persons with disabilities to use the Library's goods, services, and facilities. The Library will offer a broad range of assistive devices, including communication supports to help meet the reading and learning needs of persons with disabilities.

The Library also recognizes that equitable service can be achieved by supporting the person's individual accessibility needs. ~~and provided in different ways.~~ Customers ~~Persons~~ with disabilities may use personal assistive devices while accessing the Library. ~~unless there is a health and safety risk.~~

### **3.4 Notice of Temporary Service Disruptions**

[In the event of a scheduled service disruption to its goods, services, or facilities,](#) the Library will notify its staff and customers of this disruption at least 48 hours prior to the planned start date and time. The notice should include the reason for the disruption, how long the disruption will last and a description of available alternatives, if any.

In the event of an unplanned disruption, notice will be provided as quickly as possible [through the Library's internal and external communication channels.](#)

### **3.5 Accessibility Accommodations for Persons ~~Customers~~ with Disabilities**

The Library will provide accessibility accommodations, upon request, ~~meet the standards set by~~ as required under the Ontario Human Rights Code, to its employees ~~and~~ customers with disabilities.

When a request for an accessibility accommodation is received, the Library has a legal duty ~~will strive~~ to provide the requested accommodation in a timely manner that respects the dignity, integrity, and independence of the person.

~~The Library recognizes that persons with disabilities may require individualized accommodation and that each person's needs are unique. Accommodation will be~~

~~provided unless the Library experiences “undue hardship” as defined in the Code.~~

### ~~11.0 Information and Documentation on Accessible Customer Service~~

~~The Library will document its policies, practices and procedures as required by the AODA and its regulations. Members of the public will be notified of the availability of this documentation, which will be available in a variety of formats upon request at no additional cost.~~

### ~~12.0 Accessible Materials~~

~~The Library will provide access to materials in accessible formats where materials exist.~~

### ~~6.0 Procurement~~

~~The Library will incorporate accessibility criteria and features into the procurement of goods, services and facilities, except where it is not practical as defined in the Act.~~

~~The Library will incorporate accessibility features and criteria when designing, procuring or acquiring self-service kiosks such as self-check out terminals.~~

~~In the event where it is not practicable to procure accessible goods, services, self-serve kiosks, or facilities, staff will document it within any files and reports related to the project.~~

## **4.0 Employment**

### **4.1 Recruitment and Hiring Process**

The Library will incorporate the requirements, established under the Accessible Employment Standards, ~~accessibility considerations~~ into its recruitment and hiring practices and procedures, including, but not limited to, the provision of accessible formats and communication supports to candidates with disabilities upon request throughout the entire hiring process.

~~The Library will build in accessibility needs into its human resources, practices, policies and procedures.~~

## **4.2 Workplace Emergency Response Information**

The Library will provide its employees with disabilities with workplace emergency response information. Upon consultation with the employee and their direct supervisor, this information will be delivered in a manner that takes into account the employee's individual accessibility needs.

## **4.3 Documented Individualized Accommodation Plans**

The Library will establish a process for the development of documented individualized accommodation plans for its employees with disabilities.

In consultation with the employee, their direct supervisor, and union representative, if applicable, the Plan will document the workplace accommodations that will be required to perform the duties of their role at the Library.

## **4.4 Return to Work Process**

When absent from work due to a disability, the Library will adhere to its return to work process, as outlined in its Collective Agreement, for its employees, including the provision of accessibility accommodations if required.

The process referenced in this section does not replace or super cede an existing return to work process created, or mandated, under another statute. Rather, it will support the successful return to work of all employees.

## **4.5 Performance Management**

The Library, throughout its performance management process, will take into account the individual accessibility needs of its employees with disabilities and their documented accommodation plan, if one has been established.

## **4.6 Career Development**

When establishing policies, programs, or strategies that support the career development and advancement of its employees, the Library will take into account the individual accessibility needs of its employees with disabilities, and their documented accommodation plan, if one has been established.

#### **4.7 Position & Location Changes**

When transferring or relocating employees with disabilities to a new location or position, the Library will take into account their individual accessibility needs, as well as their documented accommodation plan, if one has been established.

#### **5.0 Built Environment & Public Spaces**

When designing newly constructed or renovated branches or facilities, the Library will incorporate the requirements established under the City of Toronto's Accessibility Design Guidelines (TADG).

The TADG serves as a guiding set of standards that aims to meet and exceed the [Ontario Building Code](#) Barrier-Free design requirements and the technical requirements under the [AODA Design of Public Spaces Standards](#).

When conducting public consultations on a newly constructed or renovated branch or facility, the Library will hold such consultations in an accessible venue and location, include people with disabilities, and provide any related documents in an accessible format or through an appropriate communication support upon request.

#### **Accountability**

The City Librarian and Directors are responsible for the implementation of this policy.

The Director, Human Resources, through the Manager, Accessibility, ~~Planning, Policy and Performance Management~~ is responsible for monitoring, analyzing, and reporting on any amendments made to the Standards under the IASR.

The Library is responsible for reporting to the Ministry for Seniors and Accessibility of Community and Social Service every three (3) years on its compliance with the requirements under the IASR.

### Related Legislation

- [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#)
- [City of Toronto Corporate Accessibility Policy](#)
- [City of Toronto Accessibility Design Guidelines](#)
- [Integrated Accessibility Standards Regulation \(IASR\)](#)
- [Ontario Building Code](#)
- [Ontario Human Rights Code](#)
- [Web Content Accessibility Guidelines \(WCAG\)](#)

### Definitions

**Accessible Formats:** Accessible formats, sometimes called alternate formats, are ways of presenting printed, written, or visual material so that people with print disabilities can access it. People with print disabilities may:

- Be blind or live with low vision
- Have a learning disability that affects reading
- Have a physical disability and be unable to hold or turn pages

Accessible formats may include, but are not limited to:

- Plain language
- Large print
- Braille
- Electronic (MS Office, Rich Text, or PDF)
- Audio

**Assistive Device:** An assistive device is a tool, technology or other mechanism that enables a person with a disability to do everyday tasks and activities such as

moving, communicating or lifting. Examples include, walkers, magnifiers for reading, computer hardware and software, white canes, wheelchairs, scooters, and smart phones or tablets.

**Barrier:** A barrier is any systemic, attitudinal, technological, informational, or architectural limitation that prevents someone from participating fully in society due to their disability.

**Communication Supports:** Communication supports are ways for people who cannot access verbal or audio information to receive it visually or ways for people who are non-verbal to communicate with people who speak. For instance, people who do not understand verbal communication may:

- Be Deaf, deafened, or hard of hearing
- Be Deaf/blind

Some common communication supports include:

**American Sign Language (ASL):** American Sign Language (ASL) is a complete, natural language that has the same linguistic properties as spoken languages, with grammar that differs from English. ASL is expressed by movements of the hands and face. It is the primary language of many North Americans who are Deaf, deafened, oral deaf, and hard of hearing, and is used by many hearing people as well.

**Note: The ‘uppercase D’ in the word Deaf is used to describe people who identify as culturally Deaf to reflect their participation and belonging in Deaf Culture. The “lowercase d” in the word deaf refers to the physical condition of not hearing.**

**Communication Access Real-Time Translation (live captioning):**

Communication Access Real-Time Translation (CART) is the live, word-for-word transcription of speech to text so that individuals who are Deaf, deafened, oral deaf, or hard-of-hearing can read what is being said in meetings, events, or at

personal appointments on a laptop or a larger screen. CART services can be provided on-site or remotely, in both English and French, via a secure website.

**Langue des signes du Québec (LSQ):** Quebec Sign Language, known in French as Langue des signes québécoise or Langue des signes du Québec (LSQ), is the predominant sign language of Deaf communities used in francophone Canada, primarily in Quebec.

**Deaf Interpreter:** A Deaf Interpreter (DI) is a specialist who provides interpreting services in American Sign Language (ASL), Langues des signes québécoise (LSQ), and other visual and tactual communication forms used by individuals who are Deaf, hard of hearing, and deafblind.

As a person who is Deaf, the Deaf Interpreter starts with a distinct set of formative linguistic, cultural, and life experiences that enables nuanced comprehension and interaction in a wide range of visual language and communication forms, which are influenced by region, culture, age, literacy, education, class, and physical, cognitive, and mental health. These experiences, coupled with professional training, give the Deaf interpreter the ability to effect successful communication across all types of interpreted interactions, both routine and high risk.

**Intervener:** An intervener is a trained professional who acts as the “eyes” and “ears” of a person who is deafblind, providing specialized communications services and supports.

**Disability:** As defined in the AODA, disability means:

(a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,

- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*; (“handicap”)

**Kiosk:**

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.

**Service Animal:** A service animal means any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including a physical, sensory, episodic, intellectual, or a mental health disability. Tasks performed can include, among other things, guiding, pulling a wheelchair, retrieving dropped items, alerting a person to a sound, reminding a person to take medication, or pressing an elevator button.

**Support Person:** In relation to a person with a disability, another person who accompanies the individual with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

**“Reasonable Efforts”**

~~The Customer Service Standard requires organizations to make reasonable efforts to meet the needs of persons with disabilities. The Library defines reasonable efforts as providing the best possible service within the context of: available resources, balancing the needs of persons with disabilities with others who may encounter barriers to access and with the community at large, the health and safety of Library staff and volunteers, the security of Library property and existing laws and contracts.~~

**Enquiries**

Brian Daly

Policy Title:  
Policy Classification: Board Policy

Page #

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Accessibility for Persons with Disabilities Policy