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# ACCESSIBLE ELECTION REPORT 2019

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City of London 2018 Municipal  
Election

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January 21, 2019

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# City of London Accessible Election Report 2018

## Introduction

The City of London is committed to making municipal elections accessible to all citizens of London – including voters, candidates, and employees who participate in the election administration. The City Clerk's Accessible Election Plan was posted on the City's website on December 22, 2017 in accordance with section 12.1 of the *Municipal Elections Act, 1996*. The City of London's Accessible Election Plan 2018, supports and enhances the City's policies, multi-year Accessibility Plan and commitment to respond to the needs of persons with disabilities.

## Purpose

The focus of the Accessible Election Plan 2018 is to:

- a) ensure that electoral services are accessible to all voters and candidates;
- b) identify and eliminate barriers for persons with disabilities; and
- c) create a positive and inclusive voting experience.

## Plan Development and Review

The City of London's Accessible Election Plan 2018 was developed by members of the City Clerk's Elections Team, in consultation with the Accessibility Advisory Committee and the City's Municipal Policy (AODA) Specialist. Leading up to the election, the proposed Plan was submitted to the Accessibility Advisory Committee for review and comment. This document identified barriers that could be experienced by people with disabilities during an election, and identified actions to address each barrier.

The following criteria were considered in the development of this Plan:

Policies and procedures must be consistent with the principles of the [Municipal Elections Act, 1996](#), the [Ontarians with Disabilities Act, 2001](#), and the [Accessibility for Ontarians with Disabilities Act, 2005](#), and respect the dignity and independence of persons with disabilities.

Accessibility was identified early in the election planning process as a priority for the 2018 municipal election. In early 2017, the City Clerk's Office developed strategies and initiatives to identify, remove and prevent barriers that affect voters and candidates with disabilities during the election process. The Plan established measurables by which to evaluate the effectiveness of each initiative. As indicated through the attached update to the Accessible Election Plan, there were numerous accessibility initiatives undertaken by the Elections Office leading up and into the 2018 election.

A total of 1,895 election workers were given accessibility training and all 113 candidates were provided with accessible campaign guidelines and materials. During election worker training, ample time was dedicated to explaining appropriate conduct for voters requiring assistance. Every election worker received reference materials with tips and City of London standards for assisting voters with disabilities. Training stressed the importance of removing physical barriers to the entrance of the poll and ensuring ample space for maneuvering mobility aids. All voting places were deemed accessible according to the accessibility audit, and few complaints were received regarding accessibility issues. In the future, improvements to the communication regarding the availability of alternate accessible entrances to voting places may be made.

Vote by mail provided voters with the ability to mark their ballot from home at their convenience. This allowed increased rights of privacy to voters with disabilities whom may find voting at traditional paper based voting places more difficult. In the event that a voter was unable to complete the vote by mail process on their own, Elections Office staff

scheduled home voting visits, where, upon request, a ballot was provided to the voter to mark in their home and given to the staff member to return to the drop-off centre.

Communicating the changes to the way London votes in a manner that was effective and appropriate for all citizens of London was a priority for the Elections Office. To reach persons with disabilities, the Elections Office investigated alternative communication methods and emphasized the availability of election information in multiple formats. For the first time, the City offered ballot instructions and candidate lists in braille and large print at each advance and voting day poll. City staff also integrated accessibility information in election presentations and communications wherever possible. Before the next municipal election, a review and update of accessible and alternative communication formats will take place to ensure that all citizens of London are able to effectively participate in the municipal election.

The City Clerk's Office will continue to learn, develop and adjust the Accessible Election Plan 2018 in order to meet the needs of persons with disabilities. This Plan will be reviewed and updated as new opportunities are identified or become available.

## **Post-Election Report**

Following the election, the *Municipal Elections Act, 1996* requires the City Clerk to submit a public report concerning the identification, removal and prevention of barriers that affect voters and candidates with disabilities. The City Clerk's post-election report is posted on the City's website in a format accessible to persons with disabilities and may be distributed to disability groups and other stakeholders, upon request.

## **Legislative Requirements – *Municipal Elections Act, 1996*, as amended**

The City Clerk is responsible for conducting municipal elections and establishing policies and procedures to ensure all voters have the opportunity to fully participate in the 2018 municipal election.

The *Municipal Elections Act, 1996*, as amended states the following:

- 12.1(1)A clerk who is responsible for conducting an election shall have regard to the needs of electors and candidates with disabilities. 2009, c. 33, Sched. 21, s. 8 (8).
- 12.1(2)The clerk shall prepare a plan regarding the identification, removal and prevention of barriers that affect electors and candidates with disabilities and shall make the plan available to the public before Voting Day in a regular election. 2016, c. 15, s. 11.
- 12.1(3)Within 90 days after voting day in a regular election, the clerk shall prepare a report about the identification, removal and prevention of barriers that affect electors and candidates with disabilities and shall make the report available to the public. 2016, c. 15, s. 11.
- 41(3) The clerk shall make such changes to some or all of the ballots as they consider necessary or desirable to allow electors with visual impairments to vote without the assistance referred to in paragraph 4 of subsection 52 (1). 1996, c. 32, Sched., s. 41 (3); 2001, c. 32, s. 30 (1).
- 45(2) In establishing the locations of voting places, the clerk shall ensure that each voting place is accessible to electors with disabilities. 2009, c. 33, Sched. 21, s. 8 (23).

## **Accessible Customer Service**

The City Clerk's Office is committed to providing quality goods and services that are accessible to all persons in accordance with the City of London Accessible Customer Service Standards (Appendix "B") and in compliance with the customer service standards of the *Accessibility for Ontarians with Disabilities Act, 2005*. In fulfilling our mission, the City Clerk's Office will provide services that respect the dignity and independence of persons with disabilities.

## Definitions and Barrier Types

Disability: The *Accessibility for Ontarians with Disabilities Act, 2005* defines “disability” as follows:

- (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*.

Attitudinal Barriers: Barriers result when people think and act based on false assumptions. Example: receptionist talks to an individual’s support person because they assume the individual with a disability will not understand.

Information and Communication Barriers: Barriers created when information is offered in a form that suits some, but not all, of the population. Example: print that is too small for some people to read and public address systems that alert only people who can hear the message.

Technology Barriers: Barriers occur when technology, or the way it is used, cannot be accessed by people with disabilities. Example: websites that are not accessible to people who are blind and require the use of screen reader software.

Physical and Architectural Barriers: Physical barriers or obstacles that make it difficult for some people to easily access a place. Example: a door knob that cannot be turned by a person with limited mobility or strength, or a hallway or door that is too narrow to allow a person who uses a wheelchair to pass through safely.

Organizational Barriers: Occur when policies, practices or procedures result in some people receiving unequal access or being excluded. Example: A hiring process that is not open to people with disabilities.

## Key Areas of Focus in the Elections Process

The Elections Office has identified the following five key areas of focus within the election process to prevent and remove accessibility barriers:

1. Elections Communication and Information
2. Voting Places
3. Voting Methods
4. Recruitment and Selection of Election Workers
5. Assistance for Candidates

## **Feedback**

The City Clerk welcomes feedback to identify areas where changes and improvements can be considered and ways in which the City can improve the delivery of an accessible election. The feedback process provides the City Clerk's elections staff with an opportunity to carry out corrective measures to prevent similar recurrences; address training needs, enhance service delivery, and offer accessible methods of providing election services.

Please provide us with your feedback so that we can continuously improve the accessibility of London's municipal elections. Feedback can be submitted to the Elections Office through a variety of methods including:

<b>Telephone</b>	519-661-4535
<b>In Person</b>	300 Dufferin Ave, 3 <sup>rd</sup> Floor
<b>Fax</b>	519-661-4892
<b>Mail</b>	300 Dufferin Ave, 3 <sup>rd</sup> Floor, Elections Office, London, ON N6A 4L9
<b>Website</b>	<a href="http://www.london.ca/elections">www.london.ca/elections</a>
<b>Email</b>	elections@london.ca

The London Accessibility Feedback Form can be found on the City of London's website. Additionally, staff can, upon request, complete and submit the feedback form on behalf of a person with a disability. Each completed form is reviewed by the City Clerk's Office.

If you require this information in an alternate format, please contact the Elections Office.

# City of London Accessible Election Plan Outcomes 2018

## Elections Communication and Information Initiatives

- Provide election information in alternative formats and through multiple channels
- Provide an informative and accessible election website

Strategy	Outcome
Ensure election information is available in clear, simple language.	All election information provided in clear and simple language – available in alternate formats upon request.
Continuously update election information posted on the City's website to reflect the most recent information, and temporary disruptions. Enhance the City's "Where Do I Vote?" web application to provide accessibility information about voting places.	<b>5,560</b> webpage views to "Where do I Vote?" webpage
Ensure election web pages are W3C Consortium WCAG 2.0 Level A compliant.	Compliant.
Establish and continuously update a dedicated accessibility section on the election's website that provides information on the initiatives undertaken by the City Clerk's Office.	<b>3,229</b> webpage views to Accessible Election information ~ <b>51</b> inquiries related to election accessibility <b>4</b> social media posts directly related to election accessibility Accessible Voting webpage created in 2014, updated September 2018.
Make feedback and accommodation request forms available through website.	No requests received via feedback form.
Present information about election accessibility to stakeholder and community organizations.	<b>8</b> presentations where accessible equipment was demonstrated <b>3</b> organizations requested accessible demos
Produce a "How to Vote" pamphlet in English and additional languages and make the booklet available in both print and alternative formats.	~ <b>4,600</b> pamphlets distributed  Pamphlets produced in English and Braille. Downloadable version available on london.ca/elections
Produce an accessible "How to Vote" video and post it to the City's website.	<b>6,102</b> views to Marking the Ballot webpage
Produce a city-wide mail out that outlines key election information.	~ <b>150,000</b> households reached

## Voting Places Initiatives

- Ensure all voting place access routes and entrances are clearly identified
- Ensure all voting place owners and managers are aware of accessibility requirements
- Provide a contact centre to deal with accessibility issues, concerns or complaints
- Provide information on the accessibility features available at each Voting Place
- Ensure all voting places are accessible to voters with disabilities

Strategy	Outcome
Review and update Voting Place Accessibility Checklist.	<b>Updated March 2018.</b> See Appendix "A"
Review all potential voting places with consideration for public transit access; provide information to voters on public transit access.	<b>179</b> voting places located directly on a public transit route less than 250 meters from public transit stop

Strategy	Outcome
Review all potential voting places with consideration for public transit access; provide information to voters on public transit access.	<b>12</b> voting places located greater than 500 meters from a public transit route
Review all potential voting places for accessibility including two (2) accessible parking spots near the closest entrance to the poll(s).	<b>202</b> voting places with accessible parking spots
All voting places to be inspected prior to Voting Day to ensure accessibility for all voters.	<b>273</b> locations inspected
Where possible, the accessible entrance is to be the same as the main entrance.	<b>145</b> voting places where main entrance is also the accessible entrance. <b>44</b> greeters hired to increase accessibility of entryways
In the event of disruptions to service or unforeseen circumstances that affect the accessibility of voting places during the Advance Vote or on Voting Day, notices of disruption will be posted as soon as possible: <ul style="list-style-type: none"> <li>- on the City's website</li> <li>- Facebook: London Votes,</li> <li>- Twitter: @LondonVotes</li> <li>- at the site of the disruption</li> </ul> When applicable, a media advisory will be issued.	No disruptions to services on Voting Day or Advance Vote days.
Ensure voters with accessibility needs are directed to the accessible voting entrance by prominent signage.	<b>9</b> Voting places where additional directional or parking signage was provided by Elections Office for accessible purposes
Use large-print signage at voting places; train election workers to communicate with people who are blind or have low vision. Consult with Accessibility Advisory Committee on best practices.	Large print signage provided at all voting places.
Notify all voting place owners and managers of legislative accessibility requirements in order to prevent last minute changes to voting places.	<b>211</b> Voting place managers notified.
Welcome the use of support persons and service animals in voting places. Educate elections staff on appropriate communication with voters and service animals.	Information provided in election manual. <b>1,895</b> manuals distributed.
Establish a website link to an accessibility feedback form so an elector who encounters an accessibility issue can contact Election or Accessibility staff: Email: <a href="mailto:elections@london.ca">elections@london.ca</a> Use the received feedback to ensure that voting places are accessible to voters, as required by the <i>Municipal Elections Act, 1996</i> .	<b>42</b> accessibility related emails received to <a href="mailto:elections@london.ca">elections@london.ca</a>
Provide details of accessibility features available to voters and candidates at Advance Vote locations on the City's website. Provide details of accessibility features available at voting places on Voting Day on the City's website.	<b>2,575</b> webpage visitors to Accessible Election information  Accessible Voting webpage updated September 2018.



## **Voting Methods Initiatives**

- Provide accessible voting opportunities
- Provide voting opportunities in institutions and long-term care facilities
- Provide assistance to voters with disabilities as requested
- Provide instructions on the use of accessible voting equipment

<b>Strategy</b>	<b>Outcome</b>
Provide voters with the option to vote by mail or vote by proxy.	~ <b>100</b> proxy forms distributed <b>40</b> proxy forms certified <b>115</b> Vote by Mail applications
Review ballot design to increase legibility; Increase legibility of ballots through use of accessible font styles and sizes, appropriate case usage, and colours, where possible.	Accessible ballot design reviewed by staff and produced by Vendor. Accessible equipment and ballot demonstration provided to Accessibility Advisory Committee September 2018.  <b>211</b> sets of Braille Ballot instructions distributed to all voting places
Provide an accessible ballot-marking device at all advanced polls for independent voting via “sip-and-puff”, the use of paddles, or a tactile device.	<b>12</b> accessible voting machines — one for each advance polling station. <b>3</b> voters used accessible ballot marking device during Advance Vote
Provide magnifiers, pens and paper at all voting places.	<b>1</b> magnifying sheet per voting place <b>1 set</b> of pen and paper pads per DRO (680 DROs)
Establish voting places at the following facilities in order to allow eligible residents of the facility the opportunity to vote: <ul style="list-style-type: none"> <li>• any institution in which 20 or more beds are occupied by persons who are disabled, chronically ill or infirmed</li> <li>• a long-term care facility in which 50 or more beds are occupied.</li> </ul>	<b>34</b> long-term care facilities where a dedicated voting place was established
Upon request, provide voters with the opportunity to vote from anywhere at the voting place (including curbside) with assistance from a Deputy Returning Officer. Upon request, assist the elector with voting or reading of ballot.	<b>45</b> home voting visits on or before Voting Day
Train Deputy Returning Officers to assist voters with voting process when requested.	<b>698</b> Deputy Returning Officers trained
Enable voters to swear an oath if they are unable to provide the required identification and/or documentation with a signature.	Declaration of Identity forms available at all <b>211</b> voting places. <b>3</b> engagement events focusing on Election identification options and elector qualifications
Produce videos that outline the voting process and the accessible voting technologies in use for the election. Videos will include accessible elements and captioning. Post the videos on the City’s website.	<b>4</b> videos produced regarding the election
Provide pictorial instructions on voting processes at all voting places.	<b>2</b> pictorial ballot instructions per poll provided to <b>211</b> voting places
Host a media promotion event (September 2018) on voting technology, including accessible voting equipment and processes.	<b>6</b> Accessible demonstrations to specific community groups/organizations

## **Recruitment and Staffing**

- Provide accessibility training to all Voting Day workers who participate in the election
- Ensure the recruitment process for staff is accessible

<b>Strategy</b>	<b>Outcome</b>
Develop an Accessible Election Procedure Manual providing direction on how the City of London will address the needs of persons with disabilities during the election and distribute the manual during training.	<b>1,895</b> worker manuals distributed
Develop accessibility training and reference materials for all elections staff, including: <ul style="list-style-type: none"> <li>• how to interact and communicate with persons with various types of disabilities;</li> <li>• how to interact with persons who use assistive devices or require the assistance of a service animal or support person;</li> <li>• how to use voting equipment and assistive devices to deliver election services;</li> <li>• what to do if a person is having difficulty accessing election information or services.</li> </ul>	<b>75</b> training sessions held that included accessibility training
Require all elections staff and workers to confirm in writing that they have received elections and accessibility training.	<b>1,895</b> workers trained on accessible standards and voting procedures
Provide accommodations and special services for interviews, upon request.	<b>2</b> accommodation and special services requests
Ensure the worker's manual and/or other relevant materials are available in an accessible format, upon request.	<b>2 sets</b> of reference materials produced in an accessible format

## **Assistance to Candidates**

- Provide candidates with access to information in alternative and accessible formats
- Provide candidates with information on how to make their campaign accessible to the public

<b>Strategy</b>	<b>Outcome</b>
Provide candidates with references and links to provincial publications, such as: <ul style="list-style-type: none"> <li>• Accessible Campaign Information and Communication</li> <li>• Accessible All-Candidates Meetings</li> <li>• Candidates' Guide to Accessible Elections (by Association of Municipal Clerks and Treasurers of Ontario)</li> </ul>	<b>3</b> guides/references focusing on accessible campaigns given to each of the <b>113</b> candidates at time of nomination filing
Provide information to each candidate on how to run an accessible campaign at the time of filing nomination papers, and during candidate information sessions.	<b>113</b> candidates reached
Ensure the candidate guide and/or other relevant publications are available in an accessible format, upon request.	No requests received.
Provide the City of London Voters' List in an electronic format to candidates, upon request.	<b>65</b> electronic Voters' Lists distributed
Hold candidate information sessions in accessible locations.	<b>2</b> information sessions held
Provide accommodations and special information services upon request.	<b>1</b> accommodation and special service request

**Appendix “A”  
Voting Place Accessibility Checklist**

**Voting Place Accessibility Checklist**

Ward / Poll:

Date Completed:

VOTING PLACE		
Action Item	✓ / X	Comments
<b>Bus Access</b>		
Stop located within 250m of voting place		
Accessible pathway from bus stop to voting place		
Short distance from stop to Voting Place		
<b>Voting Place Visibility</b>		
Signage visible from all directions		
<b>Pedestrian Crosswalk (if applicable)</b>		
Audible pedestrian signals		
Tactile plates		
Pavement markings clear		
<b>Safe Sidewalks</b>		
Curb cuts present where sidewalk meets roadway		
Sidewalk level		
Obstructions and debris removed		
<b>Lighting</b>		
Sufficient and bright path to the Voting Place		
<b>Marked Accessible Parking</b>		
Accessible parking spots clearly marked on pavement with appropriate signage		
Accessible parking spaces located closest to the accessible entrance		
<b>Accessible Parking Space</b>		
Min. of one (1) accessible parking spot		
Designated marked pathway to sidewalk		
<b>Parking Lot Functionality</b>		
Level ground (i.e free from pot holes)		
Curb ramps or cuts to access building entrance from parking lot		
<b>Route to Facility Entrance</b>		
Route wide enough for wheelchair		
Route free from debris and level ground		
Adequate lighting		
<b>Facility Entrance Accessibility</b>		
Entrance have ramps with handrails		
Door wide enough for wheel chair		
Easy to open or have door opener		
Adequate lighting		
<b>Location of Entrance to the Polling Station</b>		
Location within the Voting Place suitable for assistive mobility aids		
Short walking distance required to vote		

# Voting Place Accessibility Checklist

Ward / Poll:

Date Completed:

<b>POLLING STATION</b>		
<b>Action Item</b>	<b>✓ / X</b>	<b>Comments</b>
<b>Entrance to Polling Station</b>		
Entrance level with access route		
Ramp or handrails available if necessary		
Non-slip floor		
Adequate lighting		
<b>Doors</b>		
Wide framed doorways		
Doors opened with closed fist		
<b>Poll Station Location</b>		
Entrance close to the poll		
Poll location on same level as entrance		
Elevator available (if applicable)		
<b>Corridors</b>		
Wide enough for wheel chair access		
Free from obstructions		
Adequate lighting and signage		
<b>Washrooms</b>		
Accessible washroom available and nearby		
Adequate room for mobility aids		
<b>Signage</b>		
Large easy to understand signs		
Available along the path of travel from entrance to polling station		
<b>Voting Booth/Table</b>		
Booth low enough for wheel chair access		
Space around booth free from obstructions		
Chairs available		
<b>Ballot Aids</b>		
Magnifying glasses		
Braille ballot template		
<b>Assistive Devices</b>		
Pads of paper and pens		
Voter Assist Terminals (if available) in good working condition		

## **Appendix "B"**

### **City of London**

#### **Accessible Customer Service Standards from the Integrated Accessibility Standards Policy**

##### **Customer Service Standards**

###### **a. The Provision of Goods, Services, and Facilities to Persons with Disabilities**

The City will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- the City's goods, services and facilities are provided in a manner that respects the dignity and independence of persons with disabilities;
- the provision of the City's goods, services and facilities to persons with disabilities are integrated with the provision of goods, services and facilities to others, unless an alternative measure is necessary, whether temporary or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the City's goods, services and facilities;
- persons with disabilities are given an opportunity equal to that of persons without disabilities to obtain, use or benefit from the City's goods, services and facilities.

###### **b. Communication with Persons with Disabilities**

When communicating with a person with a disability, the City will do so in a manner that takes into account the person's disability.

Upon request, the City will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at a cost that is no more than the regular cost charged to other persons.

###### **c. Notice of Temporary Disruptions in Goods, Services, and Facilities**

The City is aware that the operation of its goods, services and facilities is important to the public. However, temporary disruptions in the City's services and facilities may occur due to reasons that may or may not be within the City's control or knowledge.

The City will make reasonable effort to provide notice of the disruption to the public, including information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, that may be available. The City will make reasonable effort to provide prior notice of planned disruption if possible, recognizing that in some circumstances such as in the situation of unplanned temporary disruption, advance notice will not be possible. In such cases, the City will provide notice as soon as possible.

When temporary disruptions occur to the City's services or facilities, the City will provide notice by posting the information in visible places, and/or on the City's webpage ([www.london.ca](http://www.london.ca)), or by any other method that may be reasonable under the circumstances as soon as reasonably possible.

#### **d. Assistive Devices and other Measures that Assist with Accessibility**

A person with a disability may provide their own assistive device for the purpose of obtaining, using and benefiting from the City's goods, services and facilities. Exceptions may occur in situations where the City has determined that the assistive device may pose a risk to the health and safety of a person with a disability or the health and safety of others on the premises.

In these situations and others, the City may offer a person with a disability other reasonable measures to assist him or her in obtaining, using and benefiting from the City's goods, services and facilities, where the City has such other measures available.

It should be noted that it is the responsibility of the person with a disability to ensure that their assistive device is operated in a safe and controlled manner at all times.

#### **e. Service Animals**

Persons with a disability may enter premises owned and operated, or operated, by the City accompanied by a service animal, as defined in section 3 of this policy, and keep the animal with them if the public has access to such premises and the animal is not otherwise excluded by law. If a service animal is excluded by law, the City will ensure that alternate means are available to enable the person with a disability to obtain, use or benefit from the City's goods, services and facilities.

If it is not readily identifiable that the animal is a service animal, the City may ask the person with a disability for documentation from a regulated health professional as outlined in section 3 of this policy, confirming that the person requires the animal for reasons relating to their disability.

The City may also, or instead, ask for a valid identification card signed by the Attorney General of Canada or a certificate of training from a recognized guide dog or service animal training school.

It should be noted that it is the responsibility of the person with a disability to ensure that their service animal is kept in control at all times.

#### **f. Support Persons**

A person with a disability may enter premises owned and operated, or operated, by the City with a support person and have access to the support person while on the premises.

A support person, when assisting a person with a disability to obtain, use or benefit from the City's goods, services and facilities, will be permitted to attend at no charge where an admission fee is applicable.

The City may require a person with a disability to be accompanied by a support person while on City premises, but only if, after consulting with the person with a disability and considering the available evidence, the City determines that;

- A support person is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises; and
- There is no other reasonable way to protect the health or safety of the person with disability and the health or safety of others on the premises.

#### **g. Feedback**

The City of London is committed to providing high quality goods, services and facilities to all members of the public it serves. Feedback from the public regarding the provisions of goods, services, or facilities is welcomed as it may identify areas that require change and encourage continuous service improvements.

Feedback from a member of the public about the delivery of goods, services and facilities to persons with disabilities may be given by telephone, in person, in writing,

in electronic format or through other methods. The feedback process shall be made accessible to persons with disabilities by providing, or arranging for the provision of accessible formats and communication supports, upon request.

Information about the feedback process will be readily available to the public and notice of the process will be posted on the City's website ([www.london.ca](http://www.london.ca)) and/or in other appropriate locations.

#### **h. Training**

The City will ensure that all persons to whom this policy applies receive training as required the Customer Service Standards under Ontario Regulation 191/11 Integrated Accessibility Standards.

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

The content of the training will include:

- a review of the purposes of the Accessibility for Ontarians with Disabilities Act (AODA);
- the requirements of Ontario Regulation 191/11 Integrated Accessibility Standards which includes Customer Service Standards;
- instruction on the City's policies, procedures and practices pertaining to the provision of goods, services and facilities to persons with disabilities;
- how to interact and communicate with persons with various types of disabilities;
- what to do if a person with a particular type of disability is having difficulty accessing the City's goods, services or facilities;
- how to interact with persons with disabilities who use assistive devices or who require the assistance of a support person or service animal; and
- information about the equipment or devices available on the City's premises that may help with the provision of goods, services or facilities to persons with disabilities.

##### **i. Timeline for Training**

Training will be provided as soon as practicable upon an individual being assigned the applicable duties as well as on an ongoing basis as changes occur to the City's policies, procedures and practices governing the provision of goods, services and facilities to persons with disabilities.

##### **ii. Records of Training**

The City will keep records of the training, including the date on which training is provided and the number of individuals to whom it is provided. The names of individuals trained will be recorded for training administration purposes, subject to the *Municipal Freedom of Information and Protection of Privacy Act* ("MFIPPA").

#### **i. Availability and Formal of Documents Required by the Customer Service Standard under Ontario Regulation 191/11 Integrated Accessibility Standards**

All documents required by the Customer Service Standard under Ontario Regulation 191/11 Integrated Accessibility Standards, including the City's Accessible Customer Service policies, procedures and practices, notices of temporary disruptions, training records, and written feedback process are available upon request, subject to MFIPPA.

When providing a document to a person with a disability, the City will provide the document, or the information contained in the document, in an accessible format or with a communication support, upon request. The City shall consult with the person making the request for a document in determining the suitability of an accessible format or communication support and shall also ensure that the information is provided in a timely manner that takes into account the person's accessibility needs due to their disability and at no additional cost.

**j. Notice of the Availability of Documents**

Notice of the availability of all documents required by the Customer Service Standards will be posted on the City's website, and available upon request through the City Clerk's Office and City's public library branches. Accessible alternative formats are available of the documents are available, upon request by contacting [accessibility@london.ca](mailto:accessibility@london.ca) or by submitting a [Customer Accommodation Request Form](#).