

# Exhibition Place Multi-Year Accessibility Plan 2019-2025



Figure 1Image of Enercare Centre

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# **Commitment and Message from CEO**

# **Message from Exhibition Place Chief Executive Officer**

The Board of Governors is committed to building an inclusive organization that values the contribution of people with disabilities. It is committed to providing an accessible environment in which people with disabilities can access services and facilities at Exhibition Place, including all buildings, public spaces, information and communications, in a way that meets their individual needs. The Board of Governors of Exhibition Place's Accessibility Policy establishes a framework for compliance with the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and the requirements of the *Integrated Accessibility Standards Regulations* (IASR) under the AODA.

As an agency of the City of Toronto, the Exhibition Place Accessibility Policy supports the City of Toronto's motto "diversity our strength" and demonstrates commitment to accessibility, inclusion, equity and human rights.

## **Exhibition Place AODA Implementation Team**

To oversee the implementation of the Exhibition Place Multi-Year Plan pursuant to the Exhibition Place Accessibility Policy and our annual AODA objectives, Exhibition Place has formed a Senior Management AODA Team that meet on a regular basis. The AODA Implementation Team has representation from all departments and provide advice to the Chief Executive Officer. The membership is as follows:

- Director, Parking & Security Services, Sales & Event Management Department (Team Lead)
- Director, Operations Services, Operations Department
- Director, Accounting Services, Finance Department
- Director, IT/Telecom/Records & Archives, Finance Department
- Director, Event Management Services, Sales & Event Management Department
- Director, Facility Services, Sales & Event Management Department
- Human Resources Manager, Human Resources, Office of the CEO
- Occupational Health & Safety Consultant, Operations Department

The Implementation Team is further supported by key staff:

- Senior Archivist, Records & Archives, Finance Department
- Physical Assets Coordinator, Operations Services, Operations Department
- Digital Marketing Specialist, Office of the General Manager, Sales & Event Management Department
- Human Resources Associate, Human Resources, Office of the CEO
- Senior Financial Analyst, Accounting Services, Finance Department
- Facility Coordinator, Facility Services, Sales & Event Management Department
- Administrative Assistant, Parking & Security Services, Sales & Event Management Department

While the AODA Implementation Team will take a leadership role in developing and implementing our Multi-Year Plan approved by the Board of Governors, accessibility is a shared responsibility and everyone has a part to play in making Exhibition Place accessible to residents, visitors, attendees and co-workers. The Exhibition Place Accessibility Policy describes these roles and responsibilities for all employees and other persons acting on behalf of Exhibition Place.

# **Background and Legislation**

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) has established accessibility standards and requirements for Customer Service, Information and Communications, Employment, Transportation and Design of Public Spaces. The five standards under the AODA are explained and listed below:

- **Customer Service Standard** provide accessible customer service to people with disabilities so that they can access the same goods and services as everyone else.
- Information and Communication Standards create, provide and receive information in ways that are accessible for people with disabilities.
- **Employment Standard** Employers will provide accessibility support to employees across all stages of the employment life cycle.
- **Transportation Standard** transportation providers will make their services and vehicles accessible to people with disabilities.
- Public Spaces Standard public spaces will be designed to make it easier for everyone (people with disabilities, seniors and families) to use public spaces. Public spaces include; recreational trails, beach access routes, outdoor public use eating areas, outdoor play spaces, exterior paths of travel, accessible parking, service related elements and the maintenance of public spaces.

The five standards are combined into one standard called the <u>Integrated Accessibility</u> Standards, Regulation 191/11.

Under the *Ontario Human Rights Code*, Exhibition Place has ongoing obligations to ensure that as an organization they respect non-discrimination. They must incorporate the *Accessibility for Ontarians with Disabilities Act* (AODA) but also recognize that additional accommodation measures that go beyond the AODA, may be required as per the *Ontario Human Rights Code*.

# **Exhibition Place's Implementation of AODA**

Exhibition Place continually works towards compliance with the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). We will meet all deliverables required under the Act. Through the creation of policies, practices and procedures, we ensure that staff follow specific guidelines and remain committed to incorporating accessibility into all areas of service provided to the public and in internal processes. Exhibition Place's services and programs shall be delivered in a way that respects the dignity and independence of people with disabilities.

Exhibition Place is committed to meeting the requirements of the AODA legislation and its own policies and goals related to the identification, removal and prevention of barriers to people with disabilities and becoming a barrier free environment.

# **Format and Layout:**

Throughout this Multi-Year Accessibility Plan, we have listed each of the legislated requirement as per the AODA, followed by the action taken in the by Exhibition Place in the years 2013 to 2018 and then listed the planned action for what we wish to accomplish over the next seven years (2019-2025).

**Legislated Requirements:** what we are legislated to do as per the *Accessibility* for Ontarians with Disabilities Act (AODA).

Action Taken (2013-2018): what we have accomplished in the past 2013-2018.

Planned Action (2019-2025): what we wish to accomplish over the next seven years as per this Multi-Year Accessibility Plan.

# **General Deliverables**

Exhibition Place has undertaken and completed a number of initiatives in our ongoing strategy to prevent and remove barriers for persons with disabilities. As per the requirements of the *Accessibility for Ontarians with Disabilities Act*, the general deliverables Exhibition Place has undertaken are as follows:

## **AODA Multi-Year Accessibility Plans (MYAP)**

Listed below are the legislated requirements, action taken from the last multi-year accessibility plan 2013-2018 and planned action for Exhibition Place's new 2019-2025 Multi-Year Accessibility Plan.

## **Legislated Requirements:**

The Accessibility for Ontarians with Disabilities Act (AODA) mandates organizations to establish, implement, maintain and document a Multi-Year Accessibility Plan (MYAP). The plan outlines a strategy for how organizations will remove and prevent barriers.

The Multi-Year Accessibility Plan has specific deliverables which must be met. The plan is to be reviewed once every five years. Actions are organized using the five categories listed in the requirements:

- Customer Service
- Information and Communications
- Employment
- Transportation
- Design of Public Spaces

#### Action Taken for MYAP 2013-2018

Exhibition Place created an accessibility plan covering the years 2013 to 2018. The plan helped to direct and assist staff to put in place the deliverables required under the *Accessibility for Ontarians with Disabilities Act*, which are listed throughout this document. The 2013-2018 MYAP was posted on Exhibition Place's website in September 2014 and made available in accessible formats upon request.

The plan was created in consultation with an external accessibility consultant, the City of Toronto's Accessibility Advisory Committee and Exhibition Place's staff representing various departments. Development of action tactics to implement the Plan were led by the AODA Implementation Team. The plan is reflective of the following five standards: Customer Service, Employment, Information and Communications, Transportation and Public Spaces.

We are proud to have completed all deliverables proposed in our 2013-2018 Multi-Year Plan. You will find the action taken to meet those deliverables throughout this document. As well the new deliverables created from the new 2019-2025 Multi-Year Plan are shown under Planned Action.

#### **Planned Action (2019-2025):**

This is Exhibition Place's second Multi-Year Accessibility Plan and covers the period 2019 to 2025. The legislated requirements are for a five-year plan, but Exhibition Place has decided to be proactive and has created a plan that runs in conjunction with the Government's plan to make Ontario accessible by 2025 with a full review of the status of its implementation at the end of year three. Exhibition Place will also expand the membership of the AODA Implementation Team to include employees who have disabilities or who care for persons with disabilities. This plan serves as a road map to removing barriers as we continue to serve people with disabilities.

# **Customer Service Standard**

The Customer Service Standard, guides organizations on how to provide services to people with disabilities using the core principles of independence, dignity, integration and equality of opportunity.

To do this, organizations must make sure that they:

- A. Establish polices, practices and procedures;
- B. Provide staff training on Customer Service;
- C. Provide goods and services in an accessible manner;
- D. Provide accessible communication and documents;
- E. Allow for service animals and support persons;
- F. Provide notice of service disruption; and
- G. Ensure that any emergency procedures, plans and public safety information are available in accessible formats if requested.

#### **Exhibition Place's Commitment**

Exhibition Place strives to deliver its services, programs and facilities in a way that provides equal treatment and equitable benefits, and, in a manner, which respects the dignity and independence of people of all abilities. This is done by creating and following accessible customer service policies and practices and training staff appropriately.



Figure 2 Image of Heritage Court entrance

#### A. Customer Service Policies

Listed below are the legislated requirements, action taken and planned action for the creation of customer service policies.

#### **Legislated Requirements:**

Develop and establish policies, practices and procedures which are consistent with the requirements outlined in the Accessibility for Ontarians with Disabilities Act (AODA).

#### **Action Taken (2013-2018)**

Exhibition Place supports the goals of the Accessibility for Ontarians with Disabilities Act (AODA) and in 2010 established policies, practices and procedures which were consistent with the accessibility standards established under the AODA. The policies addressed the following:

- Followed the core principles of independence, dignity, integration and equality of opportunity;
- Provided Accessible Customer Service guidelines for employees who provide goods and services to people with disabilities;
- Allowed service animals and support persons;
- Provided communication to people with disabilities that took into account the person's disability;
- Developed a policy that directed that all public information should be provided in accessible formats, if requested;
- Provided a notice of service disruption if facilities or services are disrupted; and
- Provided accessible customer service training to employees.

Exhibition Place's Accessibility policy was initially established in April 2010 and has been amended from time to time. The current policy is available to employees via the intranet site and publicly on Exhibition Place's website. Human Resources is responsible to ensure that the Accessibility Policy is in compliance with AODA, reviewed on a regular basis and is available in accessible formats upon request.

## **Planned Action (2019-2025):**

On July 1<sup>st</sup> of 2016 legislated changes were made by the Ontario Government to the Accessible Customer Service Standard and it became part of the Integrated Accessibility Standards Regulation. These changes affected Exhibition Place's policies and revisions will need to be made accordingly.

Exhibition Place will make the following changes so that we meet the updated Customer Service Standard changes:

- Update our staff training requirements to include Customer Service training for all Exhibition Place staff, including full time, part time and volunteers. This training is not limited to those that provide goods or services;
- Update our policies regarding service animals and support persons to be in line with changes to customer service standards;

- Both the Customer Service Standard and the Integrated Accessibility Standards Regulation will be formed into one policy called the Accessibility Policy for Exhibition Place; and
- Ensure that the new policy is accessible and posted to our website.

#### **B. Staff Training**

Listed below are the legislated requirements, action taken and planned action for staff training.

#### **Legislated Requirements:**

Develop, deliver and coordinate mandatory accessibility training applicable to all employees, volunteers and those that make decisions on behalf of the organization.

#### **Action Taken (2013-2018)**

Exhibition Place's Human Resources, lead the implementation of a mandatory training strategy encompassing the requirements of the Accessibility for Ontarians with Disabilities Act and Ontario Human Rights Code. Staff were trained on the Customer Service Standard in 2010. With the release of the Integrated Accessibility Standards Regulation in 2011, and its mandatory training component, a second grounds-wide training initiative was undertaken. An on-line training session was mandated for all employees. Staff were also given the option of in-person group sessions. As part of their mandatory on-boarding program, all new staff are trained on both the Customer Service Standard and the Integrated Accessibility Standards Regulation as appropriate to individual job duties.

Some internal staff were trained on the creation of accessible documents, as part of an initiative to begin the process of creating accessible Board Reports.

## **Planned Action (2019-2025):**

Human Resources continues to lead the implementation of our training strategy by providing training to all new employees as part of their orientation process. The training will incorporate redeveloped AODA and Human Rights in-class training, intact team training and supplementary eLearning modules. Human Resources has a system in place for managing employee training history as per the legislative requirements.

We recognize that documents provided to the public and on our website must be accessible. Future staff training shall be planned and include "How to Create Accessible Documents and PDFs".

# C. Procuring or Acquiring Goods, Services and Facilities

Listed below are the legislated requirements, action taken and planned action. Legislated Requirements:

Any time an organization is making decisions on what goods, services or facilities they procure, they shall incorporate accessibility features and criteria. When it is not possible to do so, if requested, an explanation is provided.

#### **Action Taken (2013-2018)**

Exhibition Place does not procure facilities and the majority of its procurement of goods and services is through the City of Toronto Purchasing Material Management Department. When acquiring or procuring goods or services directly, Exhibition Place incorporates accessibility criteria and features, and does so as early as possible in the procurement process. Ensuring accessibility is incorporated into all direct procurement activities is the primary responsibility of the Purchasing Division who manages these activities and contracts. Where it is not practicable to do so, an explanation is provided upon request, in accordance with Accessible Procurement Guidelines.

#### **Planned Action (2019-2025):**

Exhibition Place will undertake a full review of our current process for acquiring or procuring goods and services including understanding the current process for the City of Toronto Purchasing Material Management Department.

## D. Procuring or Acquiring Self-Service Kiosks

Listed below are the legislated requirements, action taken and planned action for procuring or acquiring self-service kiosks.

#### **Legislated Requirements:**

Should an organization purchase a self-service kiosk (interactive electronic terminal, including a point-sale device, intended for public use that allows users to access one or more services or products or both) they must ensure it is accessible.

#### **Action Taken (2013-2018)**

Exhibition Place has purchased accessible self-service kiosks that are located within accessible parking spaces. We followed our procurement process through the Toronto Parking Authority.



Figure 3 Image of self-service kiosk

#### **Planned Action (2019-2025):**

Should we in the future purchase additional self-service kiosks, we will continue to ensure that accessibility criteria and features are incorporated into the design.

#### **E. Alternative Formats and Communication Supports**

Listed below, are the legislated requirements, action taken and planned action for alternative formats and communication supports.

#### **Legislated Requirements:**

Provide or arrange for accessible formats and communication supports when requested. Review relevant policies, continue to reinforce accessibility training and develop guidelines so that we are ensuring we are able to provide alternative formats and communication supports.

#### **Action Taken (2013-2018)**

Exhibition Place continues to ensure that staff are able to provide accessible formats and communication supports to the public when requested. Alternative formats are provided upon request, in a timely manner and at a cost no more than the regular cost charged to others.

#### **Planned Action (2019-2025):**

In order for staff to be able to provide accessible formats upon request, we will provide accessible documents training to key staff; How to Create Accessible Word Documents, and How to Create Accessible PDFs.

We will also look at creating templates for various documents so that new documents being created are formatted and designed to be accessible. Another consideration would be to create an Accessible Writing Guide for staff.

# F. Allow for Service Animals and Support Persons

Listed below are the legislated requirements, action taken and planned action for allowing service animals and support persons.

# **Legislated Requirements:**

If a person with a disability is accompanied by a guide dog or other service animal, the provider of goods or services shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law from the premises.

If a person with a disability is accompanied by a support person, the provider of goods or services shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

#### **Action Taken (2013-2018)**

Exhibition Place has written in their policies that a service animal is permitted anywhere that the public is allowed to go except where food is being prepared. Staff are aware and recognize the importance of not interacting with the service animals (no touch, no talk, no eye contact). If staff are uncertain if it is a legitimate service animal, they can ask the individual for a copy of a letter authorized by a Health Practitioner. The service animal must be under the care and control of the individual at all times.

Staff are aware that Support Persons, are allowed to accompany a person with a disability and stay with them at all times. Should a situation arise where the support person is not allowed then staff would provide the assistance.

#### **Planned Action (2019-2025):**

We will be adding the changes to the Customer Service requirements for service animals and support persons into the IASR policy when we make it into one policy. We may look into providing future information on service animals and support persons and the role they play through news articles or other means of communication.

#### G. Notice of Service Disruption

Listed below are the legislated requirements, action taken and planned action for providing notice of service disruption.

#### **Legislated Requirements:**

Organizations must provide notice of all disruptions, even those that are not expected. If you know ahead of time that a disruption will occur, provide notice a reasonable time in advance.

When a disruption occurs unexpectedly, such as when technology breaks down, organizations must still provide notice as soon as possible

# **Action Taken (2013-2018)**

We currently place a notice of service disruption sign up for all major service disruptions at the facility of space being affected. Notice includes reason for the disruption, its anticipated duration and a description of alternative facilities that are available. These notices are posted on Exhibition Place's website.

# **Planned Action (2019-2025):**

We will review the Notice of Service Disruption procedures to ensure it is meeting compliance with the AODA.

# H. Emergency Procedures, Plans and Public Safety Information

Listed below are the legislated requirements, action taken and planned action for the provision of emergency procedures, plans or public safety information.

# **Legislated Requirements:**

Organizations must provide its emergency procedures, plans or public safety information that it makes available to the public in an accessible format upon request.

## **Actions Taken (2013-2018):**

Exhibition Place has numerous documents and pieces of information that needed to be considered under this section as per the Accessibility for Ontarians with Disabilities Act. We are ensuring that we provide any emergency procedures, plan or public safety information in an accessible format, upon request.

#### **Planned Action (2019-2025):**

Exhibition Place to review its current documents related to emergency procedures, plans and public safety information, and decide which ones need to be made available to the public, and if so, ensure they are accessible.

# Information and Communications Standard

Under the Information and Communications Standard, organizations must make sure that all public communications are accessible to people with disabilities including:

- A. Accessible formats and communication supports;
- B. Feedback system accessible;
- C. Emergency procedure, plans or public safety information; and
- D. Accessible websites and web content.

#### **Exhibition Place's Commitment**

Exhibition Place is committed to making public communications more accessible to people with disabilities through multiple channels of communication including on-line, direct mail, advertising, outreach programs etc. This is done by creating and following the information and communications standards in the following four ways:

- Providing or arranging for accessible formats and communications supports upon request;
- Making sure that all public feedback channels (e.g. online, in-person, phone and email) are accessible;
- Making emergency procedures, plans and public safety documents available in accessible format, upon request; and,
- Updating websites to be accessible by following the Web Content Accessibility Guidelines (WCAG) 2.0.

# A. Accessible Formats & Communication Supports

Listed below are the legislated requirements, action taken and planned action for providing an accessible formats and communication supports.

# **Legislated Requirements:**

Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, in a timely manner that takes into account the person's accessibility needs due to disability; and at a cost that is no more than the regular cost charged to other persons.

The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.

Every obligated organization shall notify the public about the availability of accessible formats and communication supports.

#### **Action Taken (2013-2018)**

Exhibition Place provides alternative formats and communication supports upon request. We notify the public through our website and on other materials. Should an individual provide a request we would consult with the person and arrange and/or provide an alternative format that works for them. Staff have undertaken to ensure that all Board Reports from 2014 forward are accessible.

#### **Planned Action (2019-2025):**

We have not had many requests for alternative formats. We know that we must look at ways in being able to provide alternative formats. Exhibition Place will develop strategies to provide or arrange for the provision of accessible formats and communication supports and will include our feedback process. Staff training will take place in the near future, to ensure that we can provide this service quickly and in-house as required.

#### B. Accessible Feedback Process

Listed below are the legislated requirements, action taken and planned action for providing an accessible feedback process.

#### **Legislated Requirements:**

Every provider of goods or services shall establish a process for receiving and responding to feedback about the manner in which it provides goods or services to persons with disabilities and make the information available to the public.

#### **Action Taken (2013-2018)**

An individual that wishes to provide feedback can do so in a number of ways. They have the option of emailing, calling, or through our on-line process.

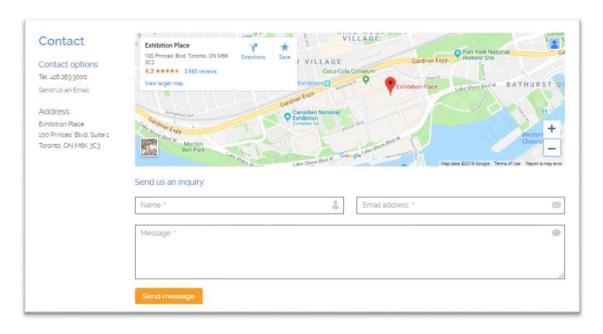


Figure 4 Screenshot of "Contact Us" page from Exhibition Place website

Another option is to access the City of Toronto's "City311" on-line tool. The City of Toronto forwards any related inquiries to us for action.

In addition, there is a central point of contact for all accessibility related inquiries including requesting accessible formats and communication supports.

#### **Planned Action (2019-2025):**

Exhibition Place will develop strategies to provide or arrange for the provision of accessible formats and communication supports and will include our feedback process.

#### C. Accessible Website and Web Content

Listed below are the legislated requirements, action taken and planned action for the provision of accessible website and web content.

In accordance with the Information and Communications Standard, organizations must ensure their website is accessible. Website accessibility includes further enhancements, improvements and ensuring compliance with WCAG, 2.0, Level A initially and working towards Level AA.

#### **Legislated Requirements:**

Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA.

#### **Action Taken (2013-2018)**

In 2014, Exhibition Place worked towards meeting Level A of the Web Content Accessibility Guidelines (WCAG) 2.0.

# **Planned Action (2019-2025):**

Exhibition Place is committed to ensuring their website and web content is accessible. From 2019 to 2021 we will be concentrating on working towards Level AA. We will also be looking at the content on the website to ensure all documents are accessible.

# **Employment Standard**

The Employment Standard, under the Integrated Accessibility Standards Regulation, requires employers to provide for accessibility across all three stages of the employment life cycle including:

- Assessment;
- Selection; and
- Retention.

#### **Exhibition Place's Commitment**

Exhibition Place is committed to fostering a positive and progressive workforce. We will provide equitable treatment and accommodation to ensure barrier-free employment in accordance with the Ontario Human Rights Code, Accessibility for Ontarians with Disabilities Act and Exhibition Place's Accommodation Policy.

#### **Legislated Requirements:**

The Employment Standard applies to paid employees including full-time, part-time, paid apprenticeships and seasonal employment.

Organizations must ensure they have policies, procedures and plans that cover and provide for:

- A. Assessment, selection and retention process;
- B. Accessible formats and communication supports for employees;
- C. Workplace emergency response information;
- D. Documented individual accommodation plan process;
- E. Return to work process;
- F. Performance management;
- G. Career development and advancement; and
- H. Redeployment.

# A. Assessment, Selection and Retention

The Employment Standard requires employers to provide for accessibility across all stages of the employment life cycle for an employee with a disability. By pro-actively removing barriers, employers can help to create workplaces that are accessible and that allow employees to receive the required support needed during the recruitment, assessment and retention portions of employment.

Listed below are the legislated requirements, action taken and planned action for recruitment, assessment and retention of employees:

# **Legislated Requirements:**

Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

If a selected for an interview or assessment, the applicant can request an accommodation. The employer shall consult with the applicant and provide or arrange

for the provision of a suitable accommodation in a manner that takes into account the applicants accessibility needs due to disability.

Once the individual is hired, an organization informs the applicant of their accommodation policies so that they can be properly accommodated and retained on the job.

#### **Action Taken (2013-2018)**

During the recruitment process, all job postings, regardless of being advertised internally or externally or full-time or seasonal, have an accessibility statement which reads as follows:

"Accommodation: You can request accommodation at any stage of our hiring process. If you are invited to participate in the assessment process, we ask that you provide your accommodation needs in advance at that time. Please be advised that you may be requested to provide medical/other documentation to Human Resources to ensure that appropriate accommodation is provided to you throughout the process."

Exhibition Place notifies the job applicant, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used. We consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disabilities.

Once the individual is hired or retained, Human Resources provides them with a copy of Exhibition Place's Accessibility Policy along with the Letter of Offer to ensure all efforts are made to support employees in need of accommodation. If accommodations are requested an Individual Accommodation Plan is created.

Seasonal employees are provided with a copy of Exhibition Place's Accessibility Policy at the time of hire if requested, during their mandatory orientation and/or can access the policy via the employee's intranet site

Human Resources policies are posted on the Employee Intranet site and all employees (full-time, year-round and seasonal) have access to this site.

All newly hired employees are required to attend a mandatory orientation which includes reviewing and signing off on some Exhibition Place policies; one of which is the Accessibility Policy.

All employees are notified of changes to policies via communication from Human Resources along with posting any amended or new policies.

## **Planned Action (2019-2025):**

We will continue with the existing process along with seeking further information from other employers, including the City of Toronto, to benchmark and possibly improve our practices.

#### **B.** Accessible Formats and Communication Supports

Listed below are the legislated requirements, action taken and planned action for accessible formats and communication supports:

#### **Legislated Requirements:**

If an employee with a disability requests an alternative format and/or communication support for information needed to perform their job or information that is generally available to employees, then the employer shall consult with the individual to provide it in an acceptable format that works.

#### **Action Taken (2013-2018)**

Human Resources, in conjunction with the necessary divisions at Exhibition Place ensure that any requests for the provision of accessible formats and/or communication supports are provided.

Human Resources consults with the employee to determine the suitability of an accessible format or communication support and ensures that the accommodations provided meet the needs of the employee.

#### **Planned Action (2019-2025):**

Exhibition Place will continue to provide alternative formats and communication supports. Moving forward, staff training on accessible formats and communication supports will ensure that newly created information is designed to be accessible from the beginning. Incorporating accessibility from the beginning will make it easier in the future when requests are made, as they will have already been designed to be accessible.

# C. Workplace Emergency Response Information

Listed below are the legislated requirements, action taken and planned action for workplace emergency response information:

# **Legislated Requirements:**

Every employee must provide individual workplace emergency response information to employees who have disabilities. Should an individual request assistance from another individual they must have their consent. The information must be reviewed and updated throughout the lifecycle of employment inclusive of changes.

# **Action Taken (2013-2018)**

Individualized workplace emergency response information is collected by Human Resources when an employee is newly hired or if an existing employee's needs change. Employees are asked a series of questions as they pertain to assistance during an emergency. If the employee indicates assistance during an emergency is needed then Human Resources in conjunction with Occupational Health & Safety meet with the employee to determine the suitability of a workplace emergency response plan. The employee is consulted and included throughout the entire plan process.

Human Resources collects emergency contact information from every newly hired employee, including seasonal employees. When collecting this information, the employee is asked if they need any assistance in the event of an emergency. If the employee states they do then they are required to attend a meeting with Human Resources and Occupational Health & Safety to determine a workplace emergency response plan.

Human Resources in conjunction with the employee review plans on an as needed basis, for example, if the employee were to move work locations, the plan would be reviewed.

#### **Planned Action (2019-2025):**

We will continue to provide workplace emergency response information, review plans and processes and adjust and make changes where needed. We will seek further information from other employers including the City of Toronto to benchmark and possibly improve our practices

#### D. Individual Accommodation Plan

Listed below are the legislated requirements, action taken and planned action for an Individual Accommodation Plan:

#### **Legislated Requirements:**

Organizations shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.

The process for the development of documented individual accommodation plans shall include the following elements:

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- The means by which the employee is assessed on an individual basis.
- The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.
- The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
- The steps taken to protect the privacy of the employee's personal information.
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

#### **Action Taken (2013-2018)**

Requests for temporary or permanent accommodations are generally managed through Human Resources. An employee requesting an accommodation will be required to meet with Human Resources, their bargaining agent, if applicable and Occupational Health & Safety in some cases.

Human Resources and the employee will both participate in putting the individual accommodation plan together ensuring it meets the needs of the employee.

Individual accommodation plans will be reviewed as requested by the employee requesting the accommodation, on an as needed basis or in the event of any changes, such as the change of the employee's work location.

Should the plan be denied, the reasons for the denial are provided to the employee.

The Individual Accommodation Plan becomes an internal tracking mechanism to record and ensure proper accommodations and ongoing support are being provided to the individual.

#### **Planned Action (2019-2025):**

We will be reviewing the Individual Accommodation Plan to ensure that it meets the tracking mechanism needed to ensure continued support throughout the employment life-cycle of the individual.

#### E. Return to Work

Listed below are the legislated requirements, action taken and planned action for the Return to Work Process:

#### **Legislated Requirements**

Organizations are required to have a return to work process for an individual who is absent from work due to a disability, and require a disability related accommodation, in order to return to work.

## **Action Taken (2013-2018)**

Exhibition has a process in place to accommodate individuals with disabilities who are absent from work due to a disability and require a disability related accommodation in order to return to work. The return to work program addresses the steps required to provide the accommodations needed and also includes a transition plan. The Return to Work Plan also includes support from the employee's attending physician in the form of a return to work letter indicating whether any limitations/supports are required.

The Return to Work Plan outlines the steps the employer will take to facilitate the return to work, the dates of the accommodation as well as any other conditions that do not fall within company policies.

#### **Planned Action (2019-2025):**

Exhibition Place's current Return to Work Process addresses the accommodation needs required for an effective return to work. We will continue to update and review on as need basis.

#### F. Performance Management

Listed below are the legislated requirements, action taken and planned action for performance management for employees:

#### **Legislated Requirements:**

Organizations must take into account the accessibility needs of employees with disabilities, as well as the Individual Accommodation Plan during performance management.

#### **Action Taken (2013-2018)**

Human Resources ensures that employees with disabilities as well as the individual accommodation plan are taken into consideration should a performance management issue arise or take place.

#### **Planned Action (2019-2025):**

Exhibition Place's current process addresses the action taken and planned action for performance management. We will continue to update and review on as need basis.

#### G. Career Development and Advancement

Listed below are the legislated requirements, action taken and planned action for career development and advancement for employees:

# **Legislated Requirements:**

An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.

# **Action Taken (2013-2018)**

Human Resources ensures that employees with disabilities as well as the individual accommodation plan are taken into consideration with respect to employee career development and advancement. Exhibition Place, recognizes that it is important that everyone is provided with opportunities to advance within our organization.

# **Planned Action (2019-2025):**

We have processes in place which consider the accessibility needs of individuals during career development and advancement. We will continue to clearly document and communicate to employees and management throughout the organization during recruitment, staffing, and redeployment related activities.

# H. Redeployment

Listed below are the legislated requirements, action taken and planned action for redeployment of employees:

#### **Legislated Requirements:**

An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

#### **Action Taken (2013-2018)**

Exhibition Place's return to work plan includes steps to involve Human Resources and, in some cases, Occupational Health & Safety in the redeployment process where there are accommodation requirements.

#### **Planned Action (2019-2025):**

We will continue to follow our current process for redeployment and shall review it and change should the need arise.

# **Transportation Standard**

The goal of the Transportation Standard is to make sure that transportation providers as well as municipalities, universities, colleges, hospitals and school boards make their services and vehicles accessible to people with disabilities.

Accessible transits allow people with disabilities to live, work and participate in their communities.

#### **Legislated Requirements:**

The requirements in the Transportation Standard will help transportation providers as well as municipalities, universities, colleges, hospitals and school boards make their services and vehicles accessible to people with disabilities.

#### **Action Taken (2013-2018)**

Exhibition Place is not impacted by the Transportation Standard as we are not a designated public sector transportation organization and we do not provide transportation. As a result, we do not have any legislated requirements that need to be met. We do however work with TTC, Metrolinx (GOTransit) and Wheel-Trans during road closures, and when major events are taking place that could have an impact on transportation services.

#### **Planned Action (2019-2025):**

None.

# **Design of Public Spaces Standard**

The Design of Public Spaces Standard applies to public spaces that are being newly constructed or renovated. There are seven areas which include:

- Recreational trails and beach access routes;
- Outdoor public use eating spaces;
- Outdoor play spaces;
- Exterior paths of travel;
- Accessible parking;
- · Obtaining services; and,
- Maintenance.

#### **Exhibition Place's Commitment**

Exhibition Place is committed to ensuring, that when designing newly built facilities and or renovating existing facilities that we incorporate the accessibility features legislated under the Design of Public Spaces Standard.



Figure 5 Image of Enercare Centre (Hall D)

#### **Accessible Built Environment Initiatives**

Listed below, are the legislation requirements, action taken and planned actions for the built environment initiatives.

#### **Legislated Requirements:**

The Public Spaces Standard requires organizations to incorporate accessibility features when constructing new or undergoing major renovations to public spaces as of January 1, 2016. Accessible public spaces include specific features that make it easier for everyone to use public spaces; people with disabilities, seniors and families. There are seven areas covered by this standard:

- Recreational trails and beach access routes;
- Outdoor public use eating areas;
- Outdoor play spaces;
- Exterior paths of travel;
- Accessible parking;

- · Obtaining services; and
- Maintenance.

#### **Action Taken (2013-2018)**

Exhibition Place proactively implements accessible built initiatives into the design of outdoor public spaces. When developing and constructing buildings and public spaces Exhibition Place not only adhered to the *Ontario Building Code*, which has a section on Barrier-Free Design, and the AODA Design of Public Spaces Standards follows the Toronto Accessibility Design Guidelines (TADG). The TADG acts as a guiding standard of excellence in accessibility for building and renovating Exhibition Place facilities and public spaces.

Even though the Public Spaces Standard is only required on a go-forward basis or if a company is undergoing major renovations, we have chosen to continually upgrade or facilities and services.

We have spent approximately \$500,000 on accessibility improvements focusing during the 2013-2015 Plan on the accessibility of washrooms and within public parking areas.



Figure 6 Accessibility signage in Enercare Centre



Figure 7 Image of washroom in Enercare Centre



Figure 8 Image of sidewalk shed

#### **Planned Action (2019-2025):**

A site accessibility audit will take place with an accessibility consultant to identify possible AODA improvements needed. We will be setting aside additional funds in both the Operating and Capital budget for renovations and will be reviewing:

- Washrooms; signage, automated push door buttons and grab bars.
- Consideration of additional family washrooms.
- Exterior pathways; width, surface, colour contrast, and curb cuts.
- Stairs; proper dimensions, hand rails and effective colour contrast.
- Accessible parking; van accessible parking included.

Exhibition Place will continue to implement the public spaces standard and follow the accessibility amendments to the Ontario Building Code and the OBC itself.

# **Closing Remarks**

Exhibition Place is committed to providing an accessible environment in which all individuals have access to Exhibition Place's services and programs in a way that respects the dignity and independence of people with disabilities.

Exhibition Place supports the goals of the Accessibility for Ontarians with Disabilities Act (AODA) and will continue to follow and implement policies, practices and procedures which are consistent with the accessibility standards established under the AODA, including accessible customer service, information and communication, employment, transportation and public spaces as applicable.

We are proud to have met the deliverables outlined in our 2013 to 2018 Multi-Year Accessibility Plan. We are passionate about continuing to identify, remove and prevent barriers to people with disabilities and becoming a barrier free environment as outlined in this our new 2019-2025 Multi-Year Accessibility Plan.