

Statement of Organizational Commitment

The St. Catharines Transit Commission (SCT) is committed to developing, implementing, maintaining, and enhancing accessibility as set out under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and its Standards for people with a disability, in a manner that:

- Reflects the principles of dignity and independence;
- Seeks to provide integrated services; and
- Provides opportunity equitable to others to obtain use and benefit from its services.

Purpose

The purpose of this policy is to set out the requirements of the AODA, Integrated Accessibility Standard Regulation (IASR) Ontario Regulation 191/11 which reflects a number of accessibility standards that organizations across Ontario, including the SCT, are required to comply with.

This document has been organized into the following sections:

- Part I – General Requirements
- Part II – Accessible Information and Communications Standards
- Part III – Accessible Employment Standards
- Part IV – Transportation Standards

This policy is not intended to replace or supersede SCT's Customer Service Policy approved by the Commission on November 26, 2009. Compliance timelines have been met or will be met in accordance with the IASR. The SCT annual status report required by Regulation 4-3(a) will provide updates in this regard.

The requirements set out in this policy and the IASR are not a replacement or a substitution for the requirements established under the *Human Rights Code* nor do the standards or policy limit any obligations owed to persons with disabilities under any other legislation.

Terms are as defined by the AODA and its Standards and are referred to herein with that intent.

Scope and Responsibility

This policy applies to all SCT employees, volunteers as well as other third parties acting on behalf of the SCT for the provision of public transit service.

Part I: General Requirements

Accessibility Plans

The SCT will establish, implement, maintain and document a multi-year accessibility plan starting in 2013 that outlines its strategy to prevent and remove barriers and meet its requirements under the IASR.

The multi-year accessibility plan will be:

- posted on the SCT's website and be provided in an accessible format, upon request, as soon as is practicable.
- reviewed and updated at least once every five years.
- established, reviewed and updated in consultation with persons with disabilities.

The SCT will:

- prepare an annual status report on the progress of measures taken to implement the multi-year accessibility plan.
- post the status report on its website and provide the report in an accessible format, upon request, as soon as is practicable.

Procurement

When procuring or acquiring goods, services, self-service kiosks or facilities, the SCT shall incorporate accessibility criteria and features, unless it is not feasible. If not feasible, the SCT shall provide an explanation, upon request.

Training

As required by the IASR, the SCT shall ensure that the following persons are provided training on (1) the requirements of the accessibility standards referred to in the IASR and (2) on the *Human Rights Code*, as it pertains to persons with disabilities:

- all employees and volunteers
- all persons who participate in developing the organization's policies

All other persons or third parties who provide services on behalf of the organization shall continue to be trained or meet their obligations as part of the SCT's procurement process. All persons referred to above shall be trained as soon as practicable.

Training (continued)

The training on the requirements of the IASR and the *Human Rights Code* shall be appropriate to the duties of the employees, volunteers and other persons.

Record of the training provided to employees, including dates, shall be kept by the Training Supervisor.

Training in respect of any changes to accessibility policies will be provided on an on-going basis.

Part II: Information and Communication Requirements

Feedback

Further to the SCT's Accessible Customer Service Policy whereby it notifies the public of various formats and methods of communications, SCT will also, upon request, provide accessible formats and communication supports when receiving and responding to feedback.

Accessible Formats

The SCT will:

- notify the public about the availability of accessible formats and communication supports.
- 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.
 - by consulting with the person making the request to determine the suitability of an accessible format or communication support.
 - at a cost that is no more than the regular cost charged to other persons.

Exceptions, this IASR does not apply to the following:

- product and product labels
- unconvertible information or communications
- information that the SCT does not control directly or indirectly through a contractual relationship

If the SCT determines that information or communications are unconvertible, the SCT shall provide the person requesting the information or communication with an explanation as to why the information or communications are unconvertible and a summary of the unconvertible information or communications. Information or communications are unconvertible if it is not technically feasible to convert the

information or communications or the technology to convert the information or communications is not readily available.

Emergency Information

The SCT shall provide any publicly available emergency procedures, plans or public safety information in an accessible format or with appropriate communication supports, upon request, as soon as practicable.

Website Accessibility

The SCT shall make their internet website 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. By January 1, 2014, any new web content shall conform to WCAG 2.0 Level A. By January 1, 2021 all internet website and web content shall conform to WCAG 2.0 Level AA (exceptions; Captions (live), Audio Descriptions (pre-recorded)).

Part III: Employment

Scope and Interpretation

The Accessible Employment Standard applies to paid employees and does not apply to volunteers and other unpaid individuals.

Recruitment and Notification

The SCT shall notify:

- Employees and the public about the availability of accommodation for applicants with disabilities during the assessment or selection process.
- Job applicants selected to participate in an assessment or selection process relating to the materials or processes to be used that:
 - Accommodations are available upon request.
 - Accommodations will take into consideration the applicant's disability.
 - Accommodations will be based on consultation between the employer and applicant.
- Successful applicants about SCT policies and any other additional supports pertaining to the accommodation of employees with disabilities.

Accessible Formats and Supports

The SCT will provide or arrange for the provision of accessible formats and communication job supports, upon request.

Workplace Emergency Information

The SCT will provide individualized workplace emergency response information to employees who have a disability, upon request.

Accommodation Plans

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

Return to Work

The SCT will develop and have in place a return-to-work process for employees who have been absent due to a disability and require disability-related accommodations in order to return to work.

Performance Management, Career development, Redeployment

The SCT's performance management will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans.

The SCT's career development/advancement or redeployment will take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans.

Part IV: Transportation Requirements

Availability of Information on Accessibility Equipment

The SCT will provide information on the accessibility features of its conventional and specialized transit services to the public, and will make this information available in an accessible format upon request.

Non-Functional Accessibility Equipment

In the event of non-functioning accessibility equipment on any of its vehicles, the SCT will provide an equivalent service to customers who rely on the accessibility equipment and service. The SCT will repair the accessibility equipment in a timely manner.

Accessibility Training

The SCT will provide accessibility training to all conventional and specialized transit employees and volunteers. Training material shall include:

- The safe use of accessibility equipment and features.
- Acceptable modifications to procedures in situations where temporary barriers exist or accessibility equipment on a vehicle fails.
- Public transit emergency response procedures that provide for the safety of persons with disabilities.

Training records are maintained including training dates for each employee.

Public Transit Emergency Preparedness and Response Policies

In the event we need to evacuate a bus, the Bus Operator will ensure all passengers are off the vehicle and in a safe location away from traffic. Bus Operators must identify passengers with injuries and disabilities and provide assistance where possible. Communication with the Supervisor is required should emergency services personnel be required to assist.

Fares - Support Persons

The SCT will not require a support person to pay a fare when that support person is needed to provide assistance to a person with a disability while travelling on its conventional or specialized transit. It is the responsibility of the person with the disability to identify their need for a support person.

Accessibility Plan - Conventional and Specialized Services

The SCT shall develop an accessibility plan which addresses both Conventional and Specialized services. The Plan shall identify the process for managing, evaluating and taking action on customer feedback and shall be reviewed once per year at a public meeting, by persons with disabilities. The Plan will also identify the procedure for estimating demand for specialized services and ways to reduce waiting times for specialized services.

Conventional Transit Services, General Requirements

When providing conventional transit services the SCT shall ensure the following services are being offered, upon request, and that information related to those services is available in an accessible format upon request.

- Deploy lifting devices, ramps or portable bridge plates upon the request of the person with a disability.
- Ensure that adequate time is provided to persons with disabilities to safely board, be secured and de-board transportation vehicles and that assistance be provided, upon request, for these activities.
- Assist with safe and careful storage of mobility aids or mobility assistive devices used by person with disabilities.
- Allow a person with a disability to travel with a medical aid without additional charge.

Fares

The SCT will not require persons with disabilities, using conventional transit services, to pay a higher fare than persons without disabilities.

Transit Stops

The SCT will ensure that persons with disabilities can board and de-board its conventional transit vehicles in a safe location, other than the designated transit stop, if the designated stop is deemed to be inaccessible, and the safe location is on the same route. When identifying a safe location, the SCT shall take into consideration the preferences provided by persons with disabilities. The SCT will develop a process from promptly reporting, to a designated authority, when a transit stop is temporarily inaccessible or when a temporary barrier exists.

Storage of Mobility Aids

The SCT will ensure that all mobility aids and mobility assistive devices are safely stored in the passenger compartment of its conventional transit vehicles when feasible, and be placed within easy reach of the person with a disability who uses the mobility aid or mobility assistive device when feasible. The SCT will not charge a fee for the storage of mobility aids or mobility assistive devices.

Priority Seating

The SCT will ensure that clearly marked priority seating for persons with disabilities is available on all of its conventional transit vehicles. This seating will be located in close proximity to the front entrance, and be identifiable through accessible signage.

Service Disruptions

The Commission is aware that the operation of its services and availability of its accessible elements is important to the public. However, temporary disruptions in the Commission's services and facilities may occur due to reasons beyond the Commission's control or knowledge. For the purpose of this policy statement, a "temporary disruption of service" is defined as a known or planned event that results in a deviation in regular service or availability of an accessible element for an extended period of time, generally beyond one day. In the event of a temporary disruption of service, when the commencement of the disruption is known, the SCT will inform the public of the disruption including the anticipated duration and a description of alternatives that may be available. Methods of communication will be one or more of the following options, as appropriate:

- The news media
- SCTC website
- City of St. Catharines website
- Customer service staff
- Posting of notice on buses and/or at bus stops and facilities affected

The Commission is not limited to the aforementioned methods of communication and will use alternative methods as appropriate.

If the service disruption results in any part of our conventional service not being accessible, then arrangements can be made with our Paratransit service.

Pre-boarding Announcements

The SCT shall, upon request, provide verbal pre-boarding announcements of routes, directions, destination, and next major intersection.

On-board Announcements

The SCT will provide electronic audible verbal announcements, on all of its conventional transit vehicles, of all destination points or available route stops, while the vehicle is on route or being operated.

Conventional Transit Technical Requirements

In accordance with sections 53 through 61 (and subject to section 40) of the IARS, the SCT will adhere to the technical requirements for transportation vehicles, specifically:

- Grab bars
- Floor and carpeted surfaces
- Allocated mobility and spaces
- Stop-requests and emergency response controls
- Lighting features
- Signage
- Lifting devices
- Steps
- Indicators and alarms

Specialized Transit Requirements, Categories of Eligibility

The SCT will maintain three categories of eligibility to qualify for specialized transportation services; unconditional, temporary and conditional eligibility, as defined in Regulation 63.

Eligibility Application Process

The SCT will develop an application process for determining eligibility for its specialized transit services. This process shall include criteria for applying on emergency or compassionate grounds, be reviewed on an annual basis, and shall not charge a fee for persons with disabilities applying to use this service.

Fare Parity

The SCT will ensure that the same fare structure is being used for both conventional and specialized transit services. Furthermore, the SCT will ensure that the same payment options are available for both conventional and specialized transit services. Alternative fare payment options will be available to people with disabilities, who because of their disabilities, cannot use commonly used fare payment options.

Visitors

The SCT will incorporate criteria related to visitors into its eligibility process for specialized transit services, and provide the service to visitors if the visitor provides proof that they are eligible for specialized transit services within the jurisdiction for which they reside, or meet the eligibility criteria established by the SCT.

Origin to Destination Services

The SCT will provide origin to destination services within its service area that takes into consideration and accommodates the needs of persons with disabilities. This service shall apply to both specialized and accessible conventional transit services.

Hours of Service

The SCT will ensure that its specialized transit service has, at a minimum, the same hours and days of operation as its conventional transit services.

Bookings

The SCT will provide same day booking service to the extent that it is available and provide accessible means to accept reservations.

Trip Restrictions

The SCT will not restrict the availability of its specialized transit services to persons with disabilities by limiting the number of trips a person with a disability can request, or implement any policies or practice that unreasonably restricts the availability of its specialized transit services.

Service Delays

On specialized transit services SCT will provide information on a service delay of 30 minutes or more when known before the trip begins.

Companions and Children

The SCT will allow companions of persons with disabilities to travel with the person, if space is available or does not deny service to another person with a disability, on its specialized transit service. Similarly, the SCT will allow children of the person with a disability to travel with the person if appropriate child safety restraints, if required, are available.

Duties of Municipalities: General

The SCT will assist the City in developing design criteria for the construction, renovation, or replacement of bus stop areas and subsequent amenities.

Approved by the St. Catharines Transit Commission
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