



Elections  
Ontario

# 2019 Status Update to the Multi-Year Accessibility Plan



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# 2019 Status Update to Multi-Year Accessibility Plan

## Message from CEO

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Elections Ontario is committed to removing and preventing barriers, as outlined in our 2017-2021 Multi-Year Accessibility Plan. Under the *Accessibility for Ontarians with Disabilities Act* (AODA), organizations are required to prepare five-year plans that document how they will meet the requirements of Ontario's accessibility legislation. This report serves as an update on the third year of our 2017-2021 Multi-Year Accessibility Plan, and the efforts Elections Ontario undertaken to remove barriers as we uphold the integrity and accessibility of the electoral process.

We accomplished a great deal in 2019. After administering a general election in 2018, we began our post-election review process. This included gathering and evaluating information and feedback from our stakeholders, including political entities, community agencies, vendors and, most importantly, voters. From the information and feedback we received, we have been able to identify potential improvements for our processes, as well as additional accessible voting solutions. We will have the opportunity to apply and test some of these changes in the upcoming Ottawa—Vanier and Orléans by-elections, which will be taking place early in 2020.

One of our main deliverables under the Information and Communications Standard of the *Accessibility for Ontarians with Disabilities Act* (AODA) was making our intranet system accessible by the end of the year, in line with legislation. This was a huge undertaking as Election's Ontario housed many documents on its existing intranet site. Staff at Elections Ontario put in a considerable amount of work to ensure our new intranet site was developed to be as accessible as possible, and that all documents on the site were, and continue to be, made accessible before being posted.

Elections Ontario remains committed to implementing accessibility into all areas of our work. I am proud to submit the 2019 status update to our multi-year accessibility plan as we continue to remove barriers to voting for all Ontarians.

Greg Essensa  
Chief Electoral Officer

## Overview

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Elections Ontario continues to identify and remove barriers to improve accessibility, as outlined in our 2017-2021 Multi-Year Accessibility Plan. Each year, Elections Ontario is mandated to prepare an annual status report on the progress of the measures taken to implement its multi-year accessibility plan. This is Elections Ontario's 2019 Status Report on the important progress that has been made in the third year of the 2017-2021 Multi-Year Accessibility Plan.

### Background and Legislation

The *Accessibility for Ontarians with Disabilities Act* (AODA) establishes accessibility standards and requirements for customer service, information and communications, employment, transportation, and the design of public spaces. The four applicable standards that Elections Ontario is required to implement under the Act are listed and explained 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 communications standard:** create, provide and receive information in ways that are accessible for people with disabilities.
- **Employment standard:** provide accessibility and accommodations to employees across all stages of the employment life cycle.
- **Public spaces standard:** design public spaces to make it easier for everyone (people with disabilities, seniors and families) to use these areas. Public spaces can include exterior paths of travel, accessible parking, service-related elements, and the maintenance of public spaces.

Under the *Ontario Human Rights Code*, Elections Ontario has ongoing obligations to accommodate people with disabilities to the point of undue hardship. The AODA is incorporated into all areas of our work and we recognize that additional accommodation measures that go beyond the Act may be required in accordance with the *Ontario Human Rights Code*.

### Commitment to the Plan

Elections Ontario is committed and legislated to implement all requirements of the AODA, as we have done since the legislation passed in 2005. Accessibility is embedded into all areas of our work, both internally for our day-to-day operations and externally for the more than 10.2 million voters we serve. Our multi-year accessibility plan, which is created every five years, guides staff on how to implement the legislation we are mandated to meet.

Staff are also provided with guidelines, policies, training and best practices and procedures so that we continue to incorporate accessibility in an efficient and focused manner.

## **Update on 2019 Accessibility Initiatives**

Elections Ontario undertakes and completes initiatives as part of its ongoing strategy to prevent and remove barriers for persons with disabilities. For each of the initiatives listed throughout this document, we show the “deliverable” followed by the “status update”.

- **Deliverable:** what we are legislated to do under the AODA for each of the standards, and what we have committed to do in our multi-year accessibility plan; and
- **Status Update:** what we have accomplished for the year 2019.



## General Requirements

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There are several general requirements that must be implemented in accordance with the *Accessibility for Ontarians with Disabilities Act* (AODA). They include:

- Multi-year accessibility plan
- Accessibility policies
- Staff training
- Accessible procurement

A report on each of the requirements is listed below:

### Multi-Year Accessibility Plan

A multi-year accessibility plan outlines an organization's strategy to prevent and remove barriers to accessibility while meeting its requirements under the AODA. The "deliverable" and "status update" for Election Ontario's 2017-2021 Multi-Year Accessibility Plan (MYAP) are provided below:

#### Deliverable

Establish, implement, maintain and document a five-year accessibility plan which outlines the organization's strategy to prevent and remove barriers. Organizations are required to provide an annual status report on the measures and steps taken on a yearly basis.

#### Status Update on the Multi-Year Accessibility Plan

Elections Ontario's MYAP outlines our five-year strategy to prevent and remove barriers and meet the legislative requirements under each of the applicable standards. The progress and the initiatives Elections Ontario has committed to, as well as any additional removal of barriers and improved access for people with disabilities, is shown throughout this report on the third year of the MYAP.

In each of our status updates to the MYAP, we mention the community agencies representing people with disabilities that assisted Elections Ontario in the development of the five-year plan. We recognize the community agencies for their valuable input and for their ongoing support and expertise.

Elections Ontario continually creates new tools to enhance the voting process and the ways in which we provide information and communications to the public. The following community agencies have been instrumental in evaluating and recommending accessibility enhancements to the services we provide to the public:

- Alliance for Equality of Blind Canadians
- Alzheimer Society of Toronto
- Arthritis Society

- Bob Rumball Canadian Centre of Excellence for the Deaf
- Canadian Hearing Society
- CNIB Foundation
- Community Living Ontario
- March of Dimes
- Ontario College of Art & Design University (OCAD)
- Ontario Federation for Cerebral Palsy
- Parkinson Canada
- Spinal Cord Injury Ontario

In December 2019, Elections Ontario also filed an annual compliance report to the Accessibility Directorate of Ontario, as required by the AODA.

## **Accessibility Policies**

Accessibility policies outline how an organization will meet their obligations under the AODA as it refers to the Customer Service Standard and the Integrated Accessibility Standards Regulation. The “deliverable” and “status update” are listed below:

### **Deliverable**

Every organization shall develop, implement and maintain policies governing how the organization achieves accessibility and meets its requirements under the accessibility standards. The policies must be consistent with the core principles of independence, dignity, integration and equality of opportunity.

### **Status Update on Accessibility Policies**

Elections Ontario has an Accessibility Policy and an Integrated Accessibility Standards Policy, both of which cover the AODA standards that are applicable, including customer service, employment, information and communications and public spaces. The policies are consistent with the four core principles of the AODA: independence, dignity, integration and equal opportunity.

## **Staff Training**

All organizations are required to provide training on the Accessible Customer Service Standard, the Integrated Accessibility Standards Regulation, and the *Ontario Human Rights Code*, as it relates to people with disabilities. The “deliverable” and “status update” for staff training are provided below:

### **Deliverable**

All employees and volunteers must be trained on the Customer Service Standard. They must also be trained on the Integrated Accessibility Standards Regulation and the *Ontario Human Rights Code*, as appropriate to the employee’s duties.

Staff shall be trained as soon as practicable. Records will be maintained of the training provided, including dates and the number of individuals trained. Should there be any changes to the policy, staff shall be trained on the policy changes.

### **Status Update on Staff Training**

All Elections Ontario staff completed training on the Customer Service Standard, the Integrated Accessibility Standards Regulation and the *Ontario Human Rights Code* as per the AODA requirements. All new internal staff automatically received the training as part of their orientation process. Records were maintained on who was trained and when.

Additional training was provided to internal head office staff in September 2019 on how to create accessible Word documents and how to convert Word documents into accessible PDFs. This will assist Elections Ontario in its ongoing objective to make information available in accessible formats.

## **Accessible Procurement**

For goods and services to be more accessible to people with disabilities, it is important that organizations incorporate accessibility into their procurement process. The “deliverable” and “status update” to ensure we incorporate an accessible procurement process are provided below:

### **Deliverable**

Accessibility criteria and features shall be incorporated when procuring or acquiring goods, services, facilities and self-service kiosks, except where not practicable to do so. If not practicable to do so, an explanation will be provided upon request.

### **Status Update on Procurement**

A review of Elections Ontario’s software and applications showed that many of the applications we purchased were designed before accessibility requirements were mandated. With the implementation of the AODA, we are required to ensure that we meet the requirements for WCAG 2.0, Level AA compliance when we are procuring

goods and services from vendors for various applications (desktop, mobile, and web). Elections Ontario will be creating the following vendor procedures and guides so that all newly purchased applications will meet compliance levels required:

- Enterprise System Compliance Procedures
- Digital Accessibility Testing Handbook
- Digital Accessibility and Usability Standards
- Digital Accessibility Best Practices

## Customer Service Standard

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The Customer Service Standard applies to all organizations, including the government, the Legislative Assembly and public, private and non-profit organizations, that provide goods or services, either directly to the public or to other organizations in Ontario (third parties), and that have one or more employees in Ontario.

Below are the legislated requirements under the Customer Service Standard and the “deliverable” and “status update” for each:

- Assistive devices
- Service animals and support persons
- Notice of service disruptions

### Assistive Devices

People with disabilities may need to use their own assistive devices in order to access an organizations goods and services. The “deliverable” and “status update” for assistive devices is provided below:

#### Deliverable

Develop a policy on allowing people to use their own personal assistive devices to access an organization’s goods and services and any other measures offered.

#### Status Update on Assistive Devices

As per Elections Ontario’s Accessible Customer Service Policy, a customer with a disability may use their own assistive device at their own pace for the purpose of obtaining, using and benefiting from Elections Ontario’s goods and services.

During the 2018 general election, and in response to feedback from community agencies representing people with disabilities, Elections Ontario permitted the use of personal phones and assistive devices by people with disabilities during an election,.

In preparation for the February 2020 by-elections in Ottawa-Vanier and Orleans, Elections Ontario planned to further increase awareness of this option through expanded outreach and marketing about the accessible voting options available for people with disabilities. A toolkit was created to highlight the accessible voting options available for people with disabilities, including the use of personal phones and devices in the polls. During the by-elections, the toolkit will be distributed in an accessible electronic format to community agencies. Research was also done on what community agencies existed in Ottawa-Vanier and Orléans so that we could inform people with disabilities of the accessible voting options available.

## **Guide Dogs, Service Animals and Support Persons**

People with disabilities may need to be accompanied by their guide dog, service animal or a support person.

### **1. Guide Dogs and Service Animals**

Guide dogs and service animals can assist a person with a disability in their daily lives. Regardless of whether they are providing physical or emotional support, they help the individual access goods and services and are allowed anywhere the public is allowed. The “deliverable” and “status update” for service animals are provided below:

#### **Deliverable**

As legislated under the Customer Service Standard, organizations must allow people with disabilities to be accompanied by their guide dog or service animal in those areas of the premises you own or operate that are open to the public, unless the animal is excluded by another law. If you cannot easily identify that the animal is a guide dog or service animal, you can ask the person to provide documentation from a regulated health professional.

#### **Status Update on Service Animals**

Elections Ontario continues to allow people with disabilities to be accompanied by their guide dog or service animal, and they are permitted to go anywhere the public is allowed. This has been written into our Customer Service Policy which is provided to all new staff as part of their training and orientation process.

### **2. Support Persons**

A support person can be used by a person with a disability in order to help them with communication, mobility, personal care for medical needs or access goods or services. If a fee is being charged, the support person must know ahead of time so that they are prepared in advance. The “deliverable” and “status update” for support persons are provided below:

#### **Deliverable**

Organizations must permit people with disabilities who use a support person to bring that person with them while accessing goods or services in premises open to the public or third parties.

Where admission fees are charged for a support person of a person with a disability you must provide notice ahead of time on what fees, if any, would be charged.

#### **Status Update Support Persons**

We continue to permit people with disabilities to bring their support person with them when accessing any goods or services provided by Elections Ontario. This

includes services at our head office and at any voting locations during a by-election or general election. During any election, should a voter require the service of an ASL interpreter or an intervenor to participate in the electoral process, Elections Ontario will cover the associated costs. With upcoming by-elections in Ottawa—Vanier and Orléans, Elections Ontario has reached out to the Canadian Hearing Society and DeafBlind Community Services Ottawa to ensure that voters will be able to arrange for interpreting services and that Elections Ontario will be billed directly for the costs.

## **Notice of Temporary Service Disruptions**

In order to use or benefit from a provider's goods or services, people with disabilities usually use particular facilities or services. If there is a temporary disruption in those facilities or services, it is important that the individual is informed so that they can make plans accordingly. The "deliverable" and "status update" for providing notice of temporary service disruptions are provided below:

### **Deliverable**

Provide notice when facilities or services that people with disabilities rely on to access or use your goods or services are temporarily disrupted. The notice must include the following three pieces of information:

- Reason for the disruption
- Anticipated duration of the disruption
- Alternative facilities or services

### **Status Update on Notice of Service Disruptions**

Elections Ontario is aware that the operation of certain services and facilities is important to people with disabilities. Elections Ontario continues to follow its Accessible Customer Service Policy, which instructs staff to provide a notice of disruption to the public, whenever applicable, including information about what service is being disrupted, the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, which may be available.

During a by-election or general election, we provide a notice of service disruption at any impacted voting locations and on the Elections Ontario website, if necessary.

## Information and Communications Standard

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To help people with disabilities access sources of information and communications, organizations are required to incorporate accessibility in the following four areas:

- Accessible feedback process
- Accessible formats and communication supports
- Emergency procedure, plans or public safety information
- Accessible websites and web content

### Accessible Feedback Process

For persons with disabilities to be able to provide feedback on the services they are receiving, they must have the means to be able to do so, and it must be in a manner that is accessible. The “deliverable” and “status update” to provide an accessible feedback process are listed below:

#### Deliverable

Establish a process for people to provide feedback on how you provide goods or services to people with disabilities, and how you will respond to any feedback and act on any complaints. Organizations shall also ensure that the information about their feedback process is readily available to the public and ensure that the feedback process is accessible to persons with disabilities by providing or arranging for accessible formats and supports upon request.

#### Status Update on the Feedback Process

Elections Ontario values feedback from the public about the goods and services we provide. People with disabilities can provide feedback in multiple ways, including by phone, email, fax, TTY, by mail or electronically using our website feedback form. During an election, we gather feedback through these ways, as well as through voter feedback forms at the polls, Returning Officer reports on accessibility measures, public opinion research, and surveys from voter groups facing barriers to voting. The feedback we gather forms part of the Chief Electoral Officer’s report on the accessibility of the election, as per the requirements of the *Election Act*. This feedback also assists Elections Ontario in our continued efforts to ensure accessible voting for all Ontarians.

### Accessible Formats and Communication Supports

To help people with disabilities access sources of information and communications, it is important to ensure that they are created and available in accessible formats. The “deliverable” and “status update” to provide accessible formats and communication supports are listed below:



## **Deliverable**

Organizations must create, provide and receive information and communications in ways that are accessible to people with disabilities. They must also notify the public that accessible formats and communication supports are available upon request.

When a person requests an accessible format or communication support, organizations are required to consult with the person to determine their accessibility needs and the suitability of information they are providing. If it is not feasible to convert the information or communications, the organization must provide an explanation as to why it cannot be converted and a summary of the content.

The information or communication must be provided in a timely manner that considers the person's accessibility needs and at a cost that is no more than the regular cost charged to other persons.

## **Status Update on Accessible Formats and Communication Supports**

We continued to provide information and communications in alternative formats upon request. With two by-elections anticipated in early 2020, Elections Ontario updated the information sent to our community partners to further increase awareness about the many accessible tools and services available to voters.

During a by-election, Elections Ontario sends outreach kits to community partners, including support organizations, shelters for voters experiencing homelessness, post-secondary schools, community centres and more. Elections Ontario also sends kits out to our accessibility partners with information about the accessible services available to voters during an election.

In 2019, Elections Ontario developed a new digital outreach kit called Voting Choices. The kit will be sent electronically to community partners in the electoral district once a by-election has been called and includes information about the different voting options and accessible services available to voters. The digital toolkit is provided in an accessible format that allows organizations to personalize the information for their client base.

Elections Ontario also shares information about accessible voting options through social media, ensuring that there is alternative text to describe each image.

News releases posted to the Elections Ontario website are made accessible before being posted and distributed to the media. All communications materials distributed by Elections Ontario are available in alternative formats upon request.

In our efforts to ensure that we created, provided and received information and communications in accessible formats for people with disabilities, additional staff training was provided to employees on "How to Create Accessible Documents". The

workshop included a demonstration of an inaccessible Word document being read by JAWS, an assistive software program for those who are Blind or have low vision. This helped staff to understand how difficult and frustrating it can be for people with disabilities to read documents that have not been made accessible. Staff learned the principles of accessible design, how to create an accessible Word document and how to convert it into an accessible PDF.

## **Emergency Procedure, Plans or Public Safety Information**

A person with a disability may want to know and understand an organization's emergency procedures, plans or public safety information prior to attending or arriving at a location. It would be important for people with disabilities to have that information in an accessible format or with appropriate communication supports. The "deliverable" and "status update" to provide emergency procedures, plans or public safety information, and the action taken by Elections Ontario are listed below:

### **Deliverable**

If an organization prepares emergency procedures, plans or public safety information and makes the information available to the public, it must be available in accessible formats or with appropriate communication supports, as soon as practicable, and upon request.

### **Status Update on Emergency Procedure, Plans or Public Safety Information**

Should a visitor or the public visit our office facilities and request in advance any Elections Ontario emergency safety information, we would provide the information in an accessible format that works for them.

## **Accessible Websites and Web Content**

Websites are often an easy and convenient way for persons with disabilities to access a company's goods or services without having to physically go to an office. Individuals can use their own assistive software and devices to manoeuvre through a website, provided it has been designed to be accessible. When a website is properly designed in a logical and understandable way, it helps everyone, not just people with disabilities. The "deliverable" and "status update" to provide accessible websites and web content and the action taken by Elections Ontario are listed below:

### **Deliverable**

By January 1, 2012, **new internet and new intranet** websites, and web content on those sites, must conform to WCAG 2.0 Level AA, other than success criteria 1.2.4 Captions (Live) and 1.2.5 Audio Descriptions (Pre-recorded).

By January 1, 2016, **all internet** websites and web content on those sites must conform to WCAG 2.0 Level AA, other than success criteria 1.2.4 Captions (Live) and 1.2.5 Audio Descriptions (Pre-recorded).

By January 1, 2020, all intranet websites must conform to WCAG 2.0, Level AA, other than success criteria 1.2.4 Captions (Live) and 1.2.5 Audio Descriptions (Pre-recorded).

### **Status Update Website and Web Content**

In 2019, Elections Ontario worked to improve the user experience on our public-facing website and web applications. This included changes such as limiting the amount of scrolling that was required by the user, reducing the number of templates used for web pages, and ensuring there was a consistent look and feel throughout.

In anticipation of the Ottawa—Vanier and Orléans by-elections, Elections Ontario worked diligently to ensure changes to the website were accessible. The Voter Information Service and the eRegistration tool were updated with new by-election information and tested for accessibility. These tools give voters the ability to look up or change voter information quickly and easily. Elections Ontario continued to post accessible documents on our website, with the option to request alternative formats.

In addition to the website changes, Elections Ontario's major task for 2019 was to ensure our intranet site was accessible as per the AODA requirements. An Accessibility Program Steering Committee was created to facilitate the review, assessment and coordination of the key accessibility initiatives required to ensure accessibility of:

- The Elections Ontario intranet
- All intranet data files (Word, Excel, PDFs, etc.) stored or used by Elections Ontario staff
- Any internal software applications (approximately 115 applications)

Elections Ontario's existing intranet was not accessible, nor was it possible to remediate. Elections Ontario designed a new accessible intranet site that includes the ability to add headings and styles, high-contrast colours, alt text for images and links, a skip-to-content link, keyboard shortcuts and other navigation tools. Documents commonly used by the organization are shared on the intranet site and made accessible before posting.

A process was developed so that changes to the intranet or the documents it housed could be requested and actioned by the site administrators, ensuring that the site remained fully accessible after every change. Editing permissions for the intranet were restricted to ensure that only accessible content was posted on the site. Clear communications were sent to all staff who would be accessing the site to explain its purpose and how to use it.

In addition, an accessibility review of all internal software applications (approximately 115 applications) was performed. Each application was tested for accessibility for WCAG 2.0, AA compliance. Reports were generated and are currently being reviewed to determine which software applications can be used, which ones may require further work to meet the accessibility requirements, and which ones will need to be replaced as no fixes are immediately available.

## Employment Standard

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The Employment Standard requires employers to provide accessible accommodation across all stages of the employment life cycle for an employee with a disability. By proactively removing barriers, employers can help to create workplaces that are accessible and that allow employees to reach their full potential. Below are the legislated requirements under the Employment Standard and the “deliverable” and “status update” for each:

- Recruitment, assessment and selection
- Accessible formats and communication supports for employees
- Workplace emergency response information
- Documented individual accommodation plans
- Return to work process
- Performance management
- Career development, advancement and redeployment

### **Recruitment, Assessment and Selection**

Notification must be provided that accommodations are available upon request during all three stages of employment, including recruitment, assessment and selection. The “deliverable” and “status update” for recruitment, assessment and selection are provided below:

#### **Deliverable**

Every employer shall notify its internal and external job applicants that accommodations will be provided upon request to support participation in all aspects of the recruitment, assessment and selection process.

New and existing employees are informed of the organizations policies for accommodating employees with disabilities. Once a person is hired or a current employee discloses that they require accommodations, an individual accommodation plan process begins.

Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations to employees with accessibility needs due to a disability.

#### **Status Update on Recruitment, Assessment and Selection**

Elections Ontario continues to notify its internal and external applicants that accommodations are available upon request. All external facing documents have been made accessible. Staff continue to follow Elections Ontario’s Employment Standard Procedures to ensure we create an accessible work experience for people with disabilities.

## **Documented Individual Accommodation Plan**

Employers will develop a written individual accommodation plan for employees with disabilities so that employers will have a clear and consistent approach for accommodating people with disabilities. Below are the “deliverable” and “status update” for the individual accommodation plan process.

### **Deliverable**

Employers shall develop and have in place a written process for the development of a documented individual accommodation plan (IAP) for employees with disabilities. The process for the development of an IAP shall include the following 12 elements:

1. An employee requesting accommodations participates in development of the IAP
2. Assessment on an individual basis
3. Identification of accommodations to be provided
4. Timelines for the provision of accommodations
5. The request for an evaluation by outside medical or other expert, at the organizations' expense, to assist with determining accommodation and how to achieve accommodation
6. The employee may request the participation of a representative from their bargaining agent, where represented, or otherwise a representative from the workplace where the employee is not represented by a bargaining agent
7. Steps taken to protect the privacy of the employee's personal information
8. Frequency with which the IAP will be reviewed and updated and the manner in which it will be done
9. If denied, the reasons for denial are to be provided to the employee
10. A format that takes into account the employee's disability needs
11. If requested, any information regarding accessible formats and communication supports provided
12. Identification of any other accommodation that is to be provided

### **Status Update on Individual Accommodation Plans:**

Elections Ontario continues to follow its written process for developing individual accommodation plans for employees with disabilities who require workplace accommodations. Once an individual notifies their manager or Human Resources that they require accommodations, an individual accommodation plan is created. If an accommodation includes accessible formats and communications supports, information about the supports are also included in the plan. In addition, the plan includes individualized workplace emergency response plans/information, where required, and identifies any other accommodations that are needed.

## **Accessible Formats and Communication Supports for Employees**

In order for people with disabilities to perform their jobs effectively, they must be provided with the accessible formats and communication supports they require. The “deliverable” and “status update” for providing accessible formats and communication supports to employees are provided below:

### **Deliverable**

Consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee’s job and information that is generally available to other employees in the workplace. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

### **Status Update on Accessible Formats and Communication Supports for Employees**

Should an employee require alternative formats or communication supports to perform their job effectively, Elections Ontario provides the format and communication supports in a way that works for the individual.

## **Workplace Emergency Response Information**

Employers must be informed and aware of the needs that an employee with a disability may have during an emergency situation. This will help employees with disabilities and the employers they work for prepare for a range of potential emergencies. The “deliverable” and “status update” is provided below:

### **Deliverable**

Every employer must provide individualized workplace emergency response information to employees who have disabilities, under the following conditions:

- When the employee’s disability is such that the information is necessary
- The employer is aware of the need for accommodation due to the employee’s disability

If an employee who receives individualized workplace emergency response information requires assistance, the employer shall, with the employee’s consent, provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

Employers shall provide information required under this section as soon as practicable after becoming aware of the need for accommodation.

The individualized workplace emergency response information shall be reviewed when an employee moves to a different location, their overall accommodation needs

or plans are reviewed, and when an employer reviews its general emergency response policies.

### **Status Update on Workplace Emergency Response Information**

Elections Ontario provides individualized workplace emergency response information to employees who have a disability. A self-assessment list of emergency situations is given to the individual to help them identify what assistance they may need during an emergency. Human Resources then develops an individualized emergency response plan to meet the individuals needs, which they then review to ensure their needs are met during an emergency.

### **Return to Work Process**

The Return to Work Process ensures that employers have a documented process for supporting employees who return to work after being away for reasons related to their disabilities. The “deliverable” and “status update” for the return to work process is listed below:

#### **Deliverable**

Develop a return to work process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. The process shall be documented, outline the steps the employer will take to facilitate the return to work and will use the individual accommodation plan as part of the process.

#### **Status Update on the Return to Work Process**

Elections Ontario has a documented process for supporting employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. Once an employee who has been absent for two weeks or more advises Elections Ontario verbally or in writing that they are preparing to return to work, a Return to Work Assessment form is provided to them. Work modifications are discussed, and HR initiates the individual accommodation plan process with the employee to assist them and to provide them with the tools required to perform their duties.

### **Performance Management**

It is important to consider the accessibility needs of employees with disabilities when assessing performance management. The “deliverable” and “status update” for performance management are provided below:

#### **Deliverable**

An employer that uses performance management for its employees shall take into account the accessibility needs of employees with disabilities, as well as individual



accommodation plans, when undertaking its performance management process with employees with disabilities.

### **Status Update Performance Management**

Elections Ontario continues to consider the accessibility needs of employees with disabilities, as well as an employee's individual accommodation response plan, when undertaking its performance management process with employees.

## **Career Development and Advancement**

When providing career development and advancement opportunities, employers are required to consider what accommodations employees with disabilities may need to succeed elsewhere in their organization or to take on new responsibilities in their current position. The "deliverable" and "status update" for career development and advancement are provided below:

### **Deliverable**

Employers that provide career development and advancement opportunities will consider the accessibility needs of their employees as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities. This can include:

- Providing additional responsibilities within an employee's current position
- The movement of an employee from one job to another that may be higher in pay
- Provide greater responsibility or be at a higher level in an organization
- Any combination of the aforementioned

### **Status Update on Career Development and Advancement**

Elections Ontario continues to consider the accessibility needs of employees with disabilities, as well as an employee's individual accommodation response plan, when providing career development and advancement opportunities to employees.

## **Redeployment**

By considering the accessibility needs of individuals with disabilities when redeploying employees, employers may help individuals continue to contribute effectively. The "deliverable" and "status update" for redeployment are provided below:

### **Deliverable**

Redeployment means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff when a particular job or department has been eliminated by the organization.

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

**Status Update on Redeployment**

Elections Ontario continues to consider the accessibility needs of employees with disabilities when moving and redeploying individuals to other positions. It is important that employees have their accommodation needs met so that they can continue to contribute effectively in their new position.

## Design of Public Spaces Standard

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Accessible public spaces include specific features that make it easier for everyone to use public spaces, including people with disabilities, seniors and families. The requirements under the Design of Public Spaces Standard applies to new construction and the redevelopment of elements in public spaces.

### Public Spaces and Accessible Voting Locations

When creating new or renovating existing public spaces, Elections Ontario follows the Design of Public Spaces Standard. When creating accessible voting locations, we follow Elections Ontario Voting Location Site Accessibility Inspection Checklist. The “deliverable” and “status update” to for the accessible design of public spaces are provided below:

#### Deliverable

When designing newly constructed or redeveloped public spaces, specific accessibility criteria must be incorporated into the following:

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

There are 44 sections under the Design of Public Spaces Standard with specific measurements and requirements, which Elections Ontario would follow should we create any new spaces or undertake any major renovations.

#### Status Update on Public Spaces and Accessible Voting Locations

Elections Ontario did not create or redevelop any new public space in 2019.

In anticipation of by-elections in Ottawa—Vanier and Orléans in 2020, Elections Ontario had to source a total of 155 accessible locations and six advanced voting locations.

The potential voting locations were audited for accessibility as per Elections Ontario’s Site Accessibility Standards. Our Voting Location Checklist included auditing each building for accessibility in the following areas:

- Exterior signage (visibility and contrasting colours)
- Accessible parking (number, size, surface and lighting)
- Exterior pathway (width, surface, slopes and appropriate ramps)

- Accessible entrance (lighting, door width, threshold, power assist and hardware)
- Internal path of travel to voting location (width, surface, slopes and ramps)
- Internal door to voting room (door width, threshold and hardware)
- Elevator (location, dimensions, length of time on door opening)

An accessibility audit of the potential voting locations found that 100 of them were accessible and 54 of them were able to be remediated to become accessible. Of the advance voting locations, five were accessible and one required remediation to be made accessible.

## Other Accessibility Initiatives

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In the months following a general election, Elections Ontario gathers and evaluates all the feedback received from the election. Elections Ontario uses this feedback to identify and measure the success of an election. It also assists us in determining what improvements need to be implemented so that we can continue to remove barriers to voting.

Following the 2018 general election, Elections Ontario completed an extensive election evaluation program through internal lessons learned and an analysis of the data collected during the election, all of which would help us in the future planning of elections. Feedback was gathered through various avenues including:

- Feedback forms at voting locations, satellite offices and returning offices across the province
- Feedback reports from each of the 124 Returning Officers
- Debriefs with various stakeholders
- A province-wide road tour to gather feedback from staff in the field
- Public opinion surveys with general voters and various voter groups (voters with disabilities, French-speaking voters, youth aged 18-24, Indigenous voters, voters living in shelters), political entities (candidates, campaign finance officers, party officials)
- Meetings with Members of Provincial Parliament (MPPs)
- A political advisory committee meeting with Ontario's political parties
- The CNIB Foundation – Ontario General Election Accessible Voting Survey 2018
- Roundtable discussions with technology vendors, community agencies and individuals representing people with disabilities
- Feedback provided via email, phone, TTY, fax, mail, in-person and through the website feedback form

Overall, our stakeholders were pleased with the 2018 general election and felt that the modernization initiatives improved processes and services. Both voters and political entities had high confidence in the new technology with 91% of voters and 82% of political entities stating they felt comfortable with the new technology. In general, a large majority of voters surveyed at the polls were confident in the voting process with regard to technology, secrecy and privacy. Additionally, the Returning Officers acknowledged that technology in the polls significant positive impact on the election: voters were able to cast their ballots much faster and election results were available within minutes of the polls closing.

During the election, we received feedback about the accessibility of some voting locations, particularly about the distance between transit stops and voting locations. A few comments on the service voters received from staff and the lack of awareness of the accessible voting options available were also received. Community

agencies representing people with disabilities and the CNIB Foundation provided additional feedback. Elections Ontario has already made changes to the braille ballot template for the upcoming by-elections in response. Several agencies praised Elections Ontario's culture of openness and willingness to make change for people with disabilities.

We also received feedback that the introduction of technology in the polls was considered to have had a very positive effect on the election. The introduction of ePoll Books and vote tabulators reduced the time a voter spent at the voting location and made results available faster than ever before.

Elections Ontario continues to expand our communication efforts to ensure voters with disabilities are aware of the alternative voting options available, such as home visits, vote by mail, curbside voting, hospital voting, use of personal devices and phones at the polls, or the fact that Elections Ontario will reimburse intervenor and interpreter costs.

Elections Ontario values the feedback and comments we receive. We will be taking the following recommendations under consideration:

- Increasing awareness about the accessible voting options available
- Ensuring staff are informed about the accommodations available when hiring people with disabilities
- Exploring ASL interpreting tools
- Improving the braille ballot template (due to time constraints during the writ period, it is not possible to provide the candidate lists in braille at all polls)
- Using agencies to share information
- Continuing to review the Elections Ontario website for ease of use

We remain committed to removing barriers to voting.