

# AODA Compliance Overview



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# **Part 1:**

## Introduction to our Multi-Year Plan

# About Our Plan

## Statement of Commitment

Brampton Library is committed to eliminating barriers for the public we serve as well as our employees. We promote an inclusive, respectful and caring environment where Library programs, services and facilities are available to everyone, including persons with disabilities.

Our goal is to ensure accessibility for the public we serve and our Brampton Library employees, while meeting legislative requirements under the Accessibility for Ontarians with Disabilities Act, 2005.

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## The Plan

This is Brampton Library's second Multi-Year Accessibility Plan (MYAP). The Plan outlines how the Brampton Library will continue in its work to increase and improve accessibility through the goods, services and facilities we provide, over the next five years. Through the plan, the Brampton Library works toward preventing, identifying and removing barriers for persons with disabilities and aims to support the province's goal of becoming barrier-free by 2025. This includes complying with requirements outlined under the Accessibility for Ontarians with Disabilities Act and the Integrated Accessibility Standards Regulation (O. Reg 191/11).

# About Our Plan

## **Structure and Governance**

The responsibility for the implementation of the Accessibility for Ontarians with Disabilities Act (AODA) and the Integrated Accessibility Standards Regulation (O. Reg 191/11) falls within the Human Resources Division at the Brampton Library. Accountability for the various clauses within the Integrated Accessibility Standards Regulation is a shared responsibility amongst the various Brampton Library departments. The Human Resources division is responsible for ensuring compliance at the corporate level and is the focal point for legislative analysis and subject matter expertise. All other departments retain the accountability for ensuring their respective clauses are executed according to the AODA legislative requirements.

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## **Consultation**

The content of Brampton Library's Multi-Year Accessibility Plan was developed in consultation with Brampton Library staff and committees including:

- Corporate Accessibility Committee
- Senior Management Team

# Accessibility Legislative Background in Ontario

## **Accessibility for Ontarians with Disabilities Act (AODA) , 2005**

The AODA was enacted in 2005. The overall purpose of the AODA is to develop, implement, and enforce accessibility standards in order to remove barriers ,and ensure that all Ontarians have fair and equitable access to goods, services, accommodation, facilities and employment, with the overall vision of a barrier-free Ontario by 2025.

The Integrated Accessibility Standards (IASR) (O. Reg. 191/11) was later developed to establish accessibility standards and requirements to support the vision of the AODA. The IASR outlines and mandates the persons or organizations described in the standards to develop and/or implement measures, policies and practices within specified time periods.

Standards developed to date through the AODA include:

- ***Accessibility Standards for Customer Service (O. Reg. 429/07)*** which came into effect on January 1, 2008 and have become part of the IASR (O. Reg. 191/11)
- ***Integrated Accessibility Standards (O. Reg. 191/11)*** which came into effect on July 1, 2011 and provides a number of general and specific requirements in the areas of employment, transportation and information and communications.
- ***Design of Public Spaces Standards (O. Reg. 413/12)*** which came into effect on January 1, 2013 and applies to new or redeveloped public spaces.

# Part 2:

## Legislated Requirements

# O.Reg 191/11: General Requirements

## **Accessibility Policies:**

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library has developed and implemented a Corporate Policy that addresses how the Library achieves or will achieve accessibility through meeting the requirements as outlined in the Accessibility for Ontarians with Disabilities Act and its Regulations. The policy was approved by the Library Board in November 2013 and re-approved in 2017.

### **Planned Action:**

Ensure on-going compliance and revise as needed by the requirements of the AODA,2005.

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## **Accessibility Plan:**

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library has developed a Multi-Year Accessibility Plan that outlines the Library's strategy to prevent and remove barriers for customers and staff with disabilities, as well as meet the requirements of the AODA and its Regulations. The plan is available on the Brampton Library website and is available in alternative formats or with communication supports upon request. The plan was approved by the CEO and City of Brampton Accessibility Advisory Committee in 2013, and re-reviewed in 2017 by the CEO and Brampton Library Senior Leadership Team.

### **Planned Action:**

The next MYAP will be reviewed in 2022 for implementation in 2023 – 2028.

# O.Reg 191/11: General Requirements

## **Procurement or Acquisition of Goods, Services and/or Facilities:**

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library continues to incorporate accessibility design, criteria and technical features when procuring or acquiring goods, services and/or facilities, except where it is not practicable to do so. Where accessibility is not practicable in the acquisition or procurement of goods, services or facilities, a documented explanation will be provided upon request. In addition, staff have been trained in accessible procurement practices.

### **Planned Action:**

Brampton Library's Facility Project Manager will continue to employ accessibility design, criteria and features in the procurement and acquisition of goods and services, on behalf of Brampton Library, whenever practicable to do so. New facility design will continue to be in compliance with the City of Brampton's Accessibility Technical Standards.

# O.Reg 191/11: General Requirements

## **Accessible Self-Service Kiosks:**

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library continues to incorporate accessibility features in the design, procurement and acquisition of the Library self-service check-out kiosks. The kiosks are easily accessible and include the option to increase or decrease text size.

Staff are also available to assist customers (as requested) to use the kiosks.

### **Planned Action:**

Ensure ongoing compliance

# O.Reg 191/11: General Requirements

## **Accessibility (AODA- IASR) and Human Rights Training:**

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library has and continues to provide general and specialized training (as applicable) in the requirements of the accessibility standards referred to in the Integrated Accessibility Standards Regulation (IASR) and in the Human Rights Code, as it pertains to persons with disabilities to:

- All Brampton Library employees and volunteers
- All persons who participate in developing Brampton Library policies
- All other persons who provide goods, services or facilities on behalf of the Library.

In addition, Brampton Library's Human Resources Division maintains a Record of Training as required through the regulation and ensures training is completed as soon as practicable.

### **Planned Action:**

Ensure ongoing compliance with training requirements.

# O.Reg 191/11: Customer Service Standard

## **AODA – Customer Service Standard Policy:**

Compliance Date: Jan 1, 2010  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library created policies, procedures and practices that were approved in 2009 and revised in 2012 and 2017 by the CEO and Library Board, due to legislative changes. The policy indicates how Brampton Library provides goods and services in an accessible manner to persons with disabilities. The AODA Customer Service Standard Policy continues to be publicly available on the Brampton Library website as well as staff intranet. In addition, this policy is available in alternate format and/or with communication supports upon request.

### **Planned Action:**

Ensure ongoing compliance.

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## **AODA – Customer Service Standard Training and Tracking:**

Compliance Date: Jan 1, 2010  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library provides accessibility awareness and AODA accessible customer service training to all staff, Library Board members, volunteers and co-op students as part of the Brampton Library on-boarding process. This mandatory training focuses on strengthening Brampton Library's customer service to both internal and external customers. Training records are tracked in the Human Resources Division.

### **Planned Action:**

Ensure ongoing compliance of training for all staff, Library Board Members volunteers and co-op students during the on-boarding process.

# O.Reg 191/11: Information and Communication Requirements

## **Accessible Customer Feedback Forms:**

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### **Completed Action:**

Policies and procedures have been developed and implemented to receive and respond to feedback from Brampton Library customers. The accessible feedback process is advertised on the Brampton Library website and through large print framed posters advertised at each library branch location service desk.

In addition, feedback can be received in various formats including phone, email, mail or in-person by completing a paper feedback form, and can be requested in alternate format, or with communication supports upon request. Feedback is reviewed and responded to by the Brampton Library Chief Executive Officer.

### **Planned Action:**

Ensure ongoing compliance.

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## **Emergency Procedures, Plans and Public Safety Information:**

Compliance Date: Jan 1, 2012  
Status: **COMPLIANT**

### **Completed Action:**

Emergency procedures, plans and public safety information continue to be available in accessible format or with communication supports upon request.

### **Planned Action:**

Ensure ongoing compliance.

# O.Reg 191/11: Information and Communication Requirements

## Accessible Websites and Web Content:

Compliance Date: Jan 1, 2014  
(Level A)

Status: **COMPLIANT**

Compliance Date: Jan 1, 2021  
(Level AA)

Status: **IN PROGRESS**

## Completed Action:

Brampton Library continues to make its public website and web content conform with the Level A, World Wide Web Consortium Web Content Accessibility (WCAG) 2.0 Guidelines.

In addition, Brampton Library offers the 'Browsealoud' software on the Brampton Library website as an accessibility option for customers. This software provides speech, reading, and translation to the Brampton Library website by facilitating access and participation for people with Dyslexia, Low Literacy, English as a Second Language, and those with mild visual impairments.

## Planned Action:

Brampton Library's Information Technology Division is currently working toward ensuring WCAG 2.0 Level AA requirements by the 2021 deadline.

# O.Reg 191/11: Information and Communication Requirements

## **Accessible Formats and Communication Supports:**

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library has developed and implemented policies and procedures to address the availability for accessible formats and communication supports. Upon request, Brampton Library continues to 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 individual's accessibility needs, at a cost that is no more than the regular costs charged to other persons with or without a disability.

The notification about the availability of accessible formats and communication supports, as well as information on our accessible services, programs and technologies is advertised on our Brampton Library public website as well as on published documents.

### **Planned Action:**

Ensure ongoing compliance.

# O.Reg 191/11: Information and Communication Requirements

## Public Libraries

Compliance Date: Jan 1, 2013  
Status: **COMPLIANT**

### Completed Action:

Brampton Library has and continues to make information about the availability of accessible materials publicly available and provides the information in an accessible format or with appropriate communication supports (upon request). Assistive devices and technologies are provided at various branches and information about availability of these services are advertised on the public Library website. In addition, Brampton Library provides access to and/or arranges for the provision of access to library accessible materials (where they exist).

Brampton Library continues to offer the free 'Visiting Library Service' to homebound individuals (who are prevented from visiting the library due to age, physical or visual disability or temporary immobilization due to an accident or illness) allowing access to a wide range of Library materials delivered directly to their homes.

Brampton Library continues to be a member of the Centre for Equitable Library Access Partners (CELA) program and provides free access to CELA's circulating collections and Daisy audio books, as well as access to Victor Classic Daisy readers.

### Planned Action:

Brampton Library will continue to ensure on-going compliance and will continue to partner with groups and services that offer the Library the opportunity to provide services that promote inclusivity. In 2018, Brampton Library will launch in partnership with Magnusmode an app that assists individuals with cognitive special needs.

# O.Reg 191/11: Employment Requirements

## Recruitment: General

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### Completed Action:

Brampton Library is committed to inclusive and barrier-free recruitment practices and continues to notify Brampton Library employees as well as the public about the availability of accommodation for applicants with disabilities in the recruitment process.

Notification is provided on the Brampton Library website and via interview invitation correspondence for both internal and external candidates. In addition, all staff when on-boarded are trained in recruitment processes including the availability of accommodations for both internal and external candidates.

### Planned Action:

Ensure ongoing compliance.

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## Recruitment: Assessment or Selection Process

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### Completed Action:

During the recruitment process, Brampton Library's Human Resources team continues to notify applicants, where they are individually selected to participate in an assessment/ selection process, that accommodations are available upon request, in relation to the materials or processes used.

### Planned Action:

Ensure ongoing compliance.

# O.Reg 191/11: Employment Requirements

## **Recruitment: Notice to Successful Candidates**

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

## **Completed Action:**

During the recruit process, when employment offers are made, the Brampton Library has and continues to notify both internal and external successful candidates of the Brampton Library's policies for accommodating employees with disabilities.

In addition, the Brampton Library's employment offer template includes a statement referring to the Brampton Library's commitment to accommodate employees with disabilities, upon notification by the employee.

## **Planned Action:**

Ensure ongoing compliance.

# O.Reg 191/11: Employment Requirements

## Informing Employees of Support:

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

## Completed Action:

Brampton Library has and continues to inform employees of its policies and procedures used to support its employees with disabilities including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

Existing staff continue to be informed of this support through in-house IASR training and new employees continue to be informed during orientation.

## Planned Action:

Ensure ongoing compliance. Existing accommodation policies and procedures for staff will be reviewed and amended where necessary to ensure that they continue to meet regulatory requirements.

# O.Reg 191/11: Employment Requirements

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

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library continues, upon request by an employee, to consult with the employee to 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 employees in the workplace.

Brampton Library's formal procedure 'Accessible Formats and Communication Supports' for employees is communicated to all employees through mandatory IASR training, as well during the on-boarding process for new hires.

### **Planned Action:**

Ensure ongoing compliance.

# O.Reg 191/11: Employment Requirements

## **Workplace Emergency Response Information:**

Compliance Date: Jan 1, 2012  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library continues to provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability. The Workplace Emergency Response Plan program is communicated to staff through IASR training and on the Brampton Library Intranet. In addition, staff have been notified via email announcement.

### **Planned Action:**

Ensure ongoing compliance.

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## **Documented Individual Accommodation Plans:**

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library has a formal company procedure in place, called the 'Accommodation Process for Employees with Disabilities,' that outlines the detailed accommodation process for employees with disabilities which comply with applicable legislation. Staff continue to be notified of this procedure through IASR training, as well as during orientation for new hires.

### **Planned Action:**

Related applicable policies, procedures and processes will continue to be reviewed as needed to ensure on-going legislative requirements.

# O.Reg 191/11: Employment Requirements

## **Return to Work**

### **Process:**

Compliance Date: Jan 1, 2014

Status: **COMPLIANT**

### **Completed Action:**

Brampton Library continues to have a formal return to work process in place for employees who have been absent from work due to a disability and require disability- related accommodations in order to return to work in a timely and safe manner. The 'Return to Work' policy and 'Modified Work Program' procedures, for employees who are disabled from either work-related or non-work related illnesses or injuries, are communicated and advertised on the Brampton Library Intranet as well through mandatory IASR training. New hires are also given this information during orientation.

### **Planned Action:**

Related applicable policies, procedures and processes will continue to be reviewed as needed to ensure on-going compliance meets legislative requirements.

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## **Performance**

### **Management:**

Compliance Date: Jan 1, 2014

Status: **COMPLIANT**

### **Completed Action:**

Brampton Library continues to take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process. Senior Management and Supervisors continue to follow the 'Performance Management' procedure to ensure an accessible performance management process. All staff continue to be notified of this process through the mandatory IASR training, as well as notified during the on-boarding process.

### **Planned Action:**

Ensure ongoing compliance.

# O.Reg 191/11: Employment Requirements

## **Career Development and Advancement:**

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library continues to 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.

In house training programs and materials are converted into accessible formats and/or with appropriate communication supports, upon request by the employee(s) with disabilities.

### **Planned Action:**

Ensure ongoing compliance.

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## **Staff Redeployment:**

Compliance Date: Jan 1, 2014  
Status: **COMPLIANT**

### **Completed Action:**

Brampton Library continues to take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying unionized or non-unionized employees with disabilities.

### **Planned Action:**

Ensure ongoing compliance.

# O.Reg 191/11: Design of Public Space Requirements

## **Design of Public Space: Completed Action:**

Compliance Date: Jan 1, 2017  
Status: **COMPLIANT**

Brampton Library continues to comply with the Barrier-Free Design of the Ontario Building Code, as well as by the City of Brampton's Accessibility Technical Standards, for new construction and major renovations of library branches.

In addition, each branch currently has at least one, or more, service counter(s) and queuing area(s) that is/are easily accessible to customers with mobility aids, including a clear space to approach the service desk counter and is useable by an individual sitting in a mobility aid.

In the event of a planned service disruption to facilities, services or systems that are relied upon by persons with disabilities to access Brampton Library goods or services, notice of the disruption is provided in advance (i.e. elevators, TTY, Accessible Workstations). The notice given includes information about the reason for the disruption, its anticipated duration and a description of alternative facilities, services or systems that may be available. Notice is also given by posting the information in a conspicuous place on library premises (i.e. on the door to the premises), on the library web site or by such other method as is reasonable under the circumstances. In the event of an unexpected disruption, notice will be provided as soon as possible.

## **Planned Action:**

Ensure ongoing compliance.

# Part 3: Feedback



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Brampton Library's Multi-Year Accessibility Plan is available on-line at [www.bramptonlibrary.ca](http://www.bramptonlibrary.ca)

Brampton Library welcomes feedback on our Multi-Year Accessibility Plan and on the accessibility of our services and programs.

**Please contact:**

Rebecca Raven,  
Chief Executive Officer  
(905) 793-4636 Ext: 74311  
[rraven@bramptonlibrary.ca](mailto:rraven@bramptonlibrary.ca)

# Multi-Year Accessibility Plan 2018 – 2022



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