

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

Issued: October 17, 2013

Revised: January 1, 2014, December 2, 2014, December 9, 2015, December 8, 2016, December 12, 2017, December 11, 2018, December 3, 2019, February 22, 2023, **November 29, 2023**

Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	<p>Policies have been reviewed by the EDI Department. Policies will be reviewed again by the Accessibility Committee in 2024 January.</p> <p>Policies have been posted to the website and uploaded to the Festival Handbook.</p> <p>It is our focus that this policy will be considered from both a staff and patron perspective and will consider ideological and attitudinal approaches to anti-ableism and disability justice framework.</p>	Complete and Ongoing	November 2023
4	Accessibility Plans	<p>4.(1) Large organizations shall,</p> <p>a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;</p>	<p>Plan was most recently reviewed and submitted to the Board in February 2023.</p> <p>The Accessibility plan, in addition to any updates, will be regularly maintained on the Festival website via the Accessibility page</p>	Complete	November 2023

		<p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>			
7	Training	<p>7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p> <p>7.2) The training on the requirements of the accessibility standards and on the Human Rights Code referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers and other persons. O. Reg. 191/11, s. 7 (2)</p>	<p>EDI Workshops related to this training are being designed and will be implemented through a combination of trained EDI staff and external facilitators</p> <p>These trainings will be designed into categories for all employees but a key focus will be dedicated to those with appropriate duties and responsibilities where the training is geared to roles that are more patron facing in nature as part of building organizational and cultural competency to meet the needs of the disabled community</p>	Ongoing	Ongoing through 2023

PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	<p>11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.</p> <p>(2) The organization shall notify the public about the availability of accessible formats and communications supports with respect to the feedback process. O. Reg. 165/16, s. 7.</p>	<p>Customer processes are already completed</p> <p>Notifications to the public about access availability will be made via the Festival website’s Accessibility page, the Visitor’s Guide and in the House Programs.</p> <p>Additional notices will also be made through social media. Any digital notifications will use measures such as “alt text” to be accessible to all patrons</p>	Complete	November 2022
12	Accessible Formats & Communication Supports	<p>12.(1) 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,</p> <p>a) in a timely manner that takes into account the person’s accessibility needs due to disability; and</p> <p>b) at a cost that is no more than the regular cost charged to other persons.</p>	<p>Website is updated to identify that the public can request accessible formats.</p> <p>3rd party contracts in place for conversion of PDFs, Braille translation</p>	Complete	January 1, 2016
12		<p>12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>	<p>Process is outlined in HR Policy 2-02E (Employment – Accessibility & Accommodation)</p>	Complete	January 1, 2016

12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Completed for patron services and job applicants through the website.	Complete	January 1, 2016
13	Emergency Procedures, Plans or Public Safety Info	13.(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	Not applicable, we do not make this information available to the public	Not applicable	January 1, 2012
14	Accessible Websites & Web Content	14.(2) 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, and shall do so in accordance with the schedule set out in this section.	<p>The Festival's website is in compliance with WCAG 2.0 Level AA.</p> <p>The Accessibility Coordinator is working to expand accessibility criteria towards published web content on all social media and associated channels.</p>	<i>In Progress</i>	<p>January 1, 2021</p> <p>All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre-recorded). <p>Aiming to have ancillary postings WCAG 2.0 Level AA accessible in 2024</p>

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PART III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	This information is included in our job postings and on our website.	Complete	January 1, 2016
23	Recruitment, Assessment or Selection Process	23.(1) During a recruitment process, an employer shall notify job applicants, 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. (2) If a selected applicant requests 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 applicant’s accessibility needs due to disability.	The process is included in HR Policy 2-02B (Employment – Recruitment). The HR Manager will outline when booking interviews with applicants.	Complete	January 1, 2016
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	The process is included in HR Policy 2-02B (Employment – Recruitment). Information is included in the contract of employment.	Complete	January 1, 2016

25	Informing Employees of Supports	25.(1) Every employer shall inform its employees of its policies 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 disability.	Training was incorporated into IAS employee training. New policies are included in 2016 Employee handbooks and HR policy manuals.	Complete	January 1, 2016
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Human Resources Policy 2-02E (Employment – Accessibility & Accommodation) is summarized in Employee handbooks and provided to all new employees.	Complete	January 1, 2016
25		25.(3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	See 25 (1) above.	Complete	January 1, 2016
26	Accessible Formats & Communication Supports for Employees	26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace.	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation)	Complete	January 1, 2016

26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation)	Complete	January 1, 2016
27	Workplace Emergency Response Information	27.(1) Every employer shall 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.	As of present, no individualized emergency plans are required; regular emergency plans are appropriate. The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation)	Complete, but subject to ongoing review.	January 1, 2012
27		(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	See 27 (1)	Complete	January 1, 2012
27		(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	See 27 (1)	Complete	January 1, 2012
27		(4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and	See 27 (1)	Will respond if required	January 1, 2012

		(c) when the employer reviews its general emergency response policies.			
28	Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation) and the IAP form is included as an Appendix	Complete	January 1, 2016
28		<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. 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. 4. 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. 5. The steps taken to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed 	<p>The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation) and the IAP form is included as an Appendix</p> <p>This information was added to the Festival employee handbook</p>	Complete	<p>January 1, 2016</p> <p>March 2023</p>

		<p>and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>			
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p>	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation) in addition to the Health & Safety Policy 2-06 (Early & Safe Return to Work)	Complete	January 1, 2016
29		<p>29. (2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p>	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation) in addition to the Health & Safety Policy 2-06 (Early & Safe Return to Work)	Complete	January 1, 2016
29		<p>29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation) in addition to the Health & Safety Policy 2-06 (Early & Safe Return to Work)	Complete	January 1, 2016 Updated September 2021

30	Performance Management	30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation)	Complete	January 1, 2016
31	Career Development & Advancement	31.(1) 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.	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation)	Complete	January 1, 2016
32	Redeployment	32.(1) 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.	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation)	Complete	January 1, 2016

PART IV – Design of Public Spaces

80.17	Outdoor Public Eating Areas	<p>80.17 Obligated organizations, other than small organizations, shall ensure that where they construct or redevelop outdoor public use eating areas that they intend to maintain, the outdoor public use eating areas meet the following requirements:</p> <ol style="list-style-type: none"> 1. A minimum of 20 per cent of the tables that are provided must be accessible to persons using mobility aids by having knee and toe clearance underneath the table and in no case shall there be fewer than one table in an outdoor public use eating area that meets this requirement. 2. The ground surface leading to and under tables that are accessible to persons using mobility aids must be level, firm and stable. 3. Tables that are accessible to persons using mobility aids must have clear ground space around them that allows for a forward approach to the tables. O. Reg. 413/12, s. 6 	The TPT Café has met this requirement	Complete	January 1, 2022
80.22	Built Environment – Exterior Paths of Travel	80.22 Obligated organizations shall ensure that any exterior paths of travel that they construct or redevelop and intend to maintain meet the requirements set out in this Part. O. Reg. 413/12, s. 6.	Exterior paths of travel, including ramps, stairs, and curb ramps meet compliance requirements.	Complete	<p>Any build or redesign after Jan 1, 2017</p> <p>The Tom Patterson Theatre is compliant as per H.P.A. Architects</p>
80.23	Built Environment – Exterior Paths of Travel	80.23 When constructing new or redeveloping existing exterior paths of travel that they intend to maintain, obligated organizations, other than small organizations, shall ensure that new and redeveloped exterior paths of travel meet requirements.		Complete	The Tom Patterson Theatre is compliant as per H.P.A. Architects

80.25	Built Environment – Exterior Paths of Travel	<p>80.25 Where stairs connect to exterior paths of travel, the stairs must meet the following requirements:</p> <ol style="list-style-type: none"> 1. The surface of the treads must have a finish that is slip resistant. 2. Stairs must have uniform risers and runs in any one flight. 3. The rise between successive treads must be between 125 mm and 180 mm. 4. The run between successive steps must be between 280 mm and 355 mm. 5. Stairs must have closed risers. 6. The maximum nosing projection on a tread must be no more than 38 mm, with no abrupt undersides. 7. Stairs must have high tonal contrast markings that extend the full tread width of the leading edge of each step. 8. Stairs must be equipped with tactile walking surface indicators that are built in or applied to the walking surface, and the tactile walking surface indicators must, <ol style="list-style-type: none"> i. have raised tactile profiles, ii. have a high tonal contrast with the adjacent surface, iii. be located at the top of all flights of stairs, and iv. extend the full tread width to a minimum depth of 610 mm commencing one tread depth from the edge of the stair. 9. Handrails must be included on both sides of stairs and must satisfy the requirements set out in paragraph 7 of subsection 80.24 (1). 10. A guard must be provided that is not less than 920 mm, measured vertically to the top of the guard from a line drawn through the outside edges of the stair nosings and 1,070 mm around the landings and is required on each side of a stairway 	Exterior paths of travel with stairs meet this requirement	Complete	The Tom Patterson Theatre is compliant as per H.P.A. Architects
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		<p>where the difference in elevation between ground level and the top of the stair is more than 600 mm but, where there is a wall, a guard is not required on that side.</p> <p>11. Where stairs are more than 2,200 mm in width,</p> <p>i. one or more intermediate handrails that are continuous between landings must be provided and located so there is no more than 1,650 mm between handrails, and</p> <p>ii. the handrails must satisfy the requirements set out in paragraph 7 of subsection 80.24 (1). O. Reg. 413/12, s. 6.</p>			
80.32	Built Environment – Off Street Parking	<p>80.32 Obligated organizations shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain, the off-street parking facilities meet the requirements set out in this Part. O. Reg. 413/12, s. 6.</p>	<p>When redesigning or constructing new off-street parking, the Built Environment standards for parking spaces including number and type of spaces, signage, and access aisles will be met.</p> <p>Facilities Manager working with EDI Department to install signage, all other requirements are met.</p>	In Progress	<p>Any build or redesign after Jan 1, 2017</p> <p>Update: The Tom Patterson Theatre will be compliant in Spring 2024. All other buildings will be compliant after major redesign.</p>
80.34	Built Environment – Off Street Parking	<p>80.34 Off-street parking facilities must provide the following two types of parking spaces for the use of persons with disabilities:</p> <p>1. Type A, a wider parking space which has a minimum width of 3,400 mm and signage that identifies the space as “van accessible”.</p>	<p>Working with Facilities Manager to add “van accessible” sign to TPT parking to meeting AODA requirements</p>	In Progress	Spring 2024
80.35	Built Environment – Off Street Parking	<p>Access aisles</p> <p>80.35 (1) Access aisles, that is the space between parking spaces that allows persons with disabilities to get in and out of their vehicles, must be provided for all parking spaces for the use of persons with</p>	TPT is in compliance.	Completed	The Tom Patterson Theatre is compliant.

		<p>disabilities in off-street parking facilities. O. Reg. 413/12, s. 6.</p> <p>(2) Access aisles may be shared by two parking spaces for the use of persons with disabilities in an off-street parking facility and must meet the following requirements:</p> <ol style="list-style-type: none"> 1. They must have a minimum width of 1,500 mm. 2. They must extend the full length of the parking space. 3. They must be marked with high tonal contrast diagonal lines, which discourages parking in them, where the surface is asphalt, concrete or some other hard surface. O. Reg. 413/12, s. 6. 			
80.37	Built Environment – Off Street Parking	80.37 Obligated organizations shall ensure that parking spaces for the use of persons with disabilities as required under section 80.36 are distinctly indicated by erecting an accessible permit parking sign in accordance with section 11 of Regulation 581 of the Revised Regulations of Ontario, 1990 (Accessible Parking for Persons with Disabilities) made under the Highway Traffic Act. O. Reg. 413/12, s. 6.	<p>Currently our accessible parking spots do not have signs erected.</p> <p>Facilities Manger is working with the EDI Department to have Accessibility signs erected</p>	<i>In Progress</i>	Spring 2024
80.40	Built Environment – Service Counters	80.40 (1) Obligated organizations shall meet the requirements set out in this Part in respect of the following: <ol style="list-style-type: none"> 1. All newly constructed service counters and fixed queuing guides. 2. All newly constructed or redeveloped waiting areas. O. Reg. 413/12, s. 6. 	<p>When redesigning or constructing new service counters, the Built Environment standards for accessible service counters, fixed queuing lines, and waiting areas will be met.</p> <p>Requirements were reviewed for TPT construction with the architects and new standards have been incorporated</p>	Completed	<p>Any build or redesign after Jan 1, 2017</p> <p>Dec. 3, 2019 Update: The Tom Patterson Theatre was compliant at time of re-opening.</p>

					All other buildings will be compliant after major redesign.
80.44	Built Environment – Preventative and Emergency Measures	<p>80.44 In addition to the accessibility plan requirements set out in section 4, obligated organizations, other than small organizations, shall ensure that their multi-year accessibility plans include the following:</p> <ol style="list-style-type: none"> 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part. 2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order. O. Reg. 413/12, s. 6. 	When maintaining or disrupting accessible features or services, the public will be notified through the measures identified in policy A-06 including: on site signage, social media, and the Festival's website. Alternative accessible measures will be provided, where possible.	Complete	January 1, 2017

PART V - Compliance

86.1	Reporting	It is a legal requirement that an organization must submit an accessibility compliance report every three years if the organization is a business or non-profit with 20 or more employees. The compliance report is confirmation that all current accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA) have been met.	File an Accessibility Compliance Report	Completed	Next report due December 2023
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