

Accessibility for People with Disabilities Policy (C602)

Recommendation

That Community and Public Services Committee recommend to City Council:

1. That City Policy C602 Accessibility for People with Disabilities, as set out in Attachment 1 of the September 18, 2019, Integrated Infrastructure Services report CR_7096, be approved.
2. That City Policies C463 Accessibility to City of Edmonton Owned and Occupied Buildings, C466 Integration of Persons with Disabilities, and C589 Accessible Participation in Council Meetings, Committee Meetings, and Public Hearings Meetings for Individuals with Disabilities, be repealed.

Executive Summary

According to the *Accessible Canada Act*, currently, one in five Canadians have a disability. That number is expected to grow with an aging population. People with disabilities are more likely to be unemployed, to live in poverty and to earn less than people without a disability. There are barriers that continue to exist today which limit the social, political and economic inclusion of people with disabilities.

All people benefit from being able to fully participate in and contribute to communities and workplaces without barriers. Policy C602 Accessibility for People with Disabilities (“the Policy”) is intended to work toward ensuring people with disabilities are treated with respect, have equitable access, and have opportunities to participate and contribute to the fullest extent in their city.

This policy will have a positive impact on ConnectEdmonton’s goal of Healthy City - Edmonton is a neighbourly city with community and personal wellness that embodies and promotes equity for all Edmontonians.

The report describes the Policy and its statements, principles and purpose. It outlines the policies to be repealed as a result of updating and integrating existing policies into one encompassing policy. The Policy reflects current research, standards and best practices, as well as what was heard through public and staff engagement. In addition, the report identifies work in progress and next steps for policy implementation.

Report

Background

Accessibility refers to the absence of barriers that prevent individuals and/or groups from participating, contributing and benefiting in all aspects of society. Accessibility is fundamental to the quality of life, well-being, and engagement of individuals with disabilities in the social, economic, cultural, spiritual and political aspects of society.

People with disabilities continue to experience barriers that limit inclusion, including:

- Negative attitudes or beliefs about what a person with a disability can or cannot do;
- Buildings, streets, spaces and places that cannot be accessed or are not easy to navigate;
- Information that is difficult or impossible to access, read or understand, either due to technology or the way it is presented;
- Computers, equipment and web applications that are difficult or impossible to use; and
- Rules and practices that leave individuals out.

Over the years, Administration has worked closely with advisory committees and organizations to research, demonstrate and incorporate best practices in its ongoing work on accessibility. However, the existing policies have not been updated to reflect the current approaches and practices. Existing policies are limited to buildings, employment, integration and access to Council meetings and public hearings.

The new Policy integrates existing policies into an updated encompassing policy and significantly broadens the City's commitment to accessibility. The Policy targets improving accessibility related to City policies, civic engagement, programs and services, communications, technology, employee services, and all forms of infrastructure (facilities, open spaces, and transportation).

The Policy strives to create a community where people with disabilities are connected to what matters to them, where barriers are identified, removed and prevented, and where there is equity for all. The Policy is based on current research, standards and best practices nationally and internationally. It incorporates what was heard from the public, people with disabilities, organizations serving these individuals, advocates, City staff and the Accessibility Advisory Committee of City Council. Gender-based analysis plus (GBA+) was completed in the development of the Policy.

Policy Statements

The policy statements outline the City's commitments in pursuing accessibility. The policy statements are ambitious and bold and will require a continuous improvement approach to create a city that is truly accessible to people with disabilities.

The first statement acknowledges that accessibility is fundamental to the quality of life, well-being, and engagement of individuals with disabilities in the social, economic, cultural, spiritual and political aspects of society.

The following outlines the City of Edmonton's commitment to pursuing accessibility objectives:

- The first commitment defines the broad range of areas within the City to which an accessibility lens will be applied, including policies, civic engagement, programs and services, employee services, communications and technology, and infrastructure (facilities, open spaces, transportation). The Policy's commitment is to pursue provision of the greatest level of access, participation, and opportunities to contribute for people with disabilities as possible.
- The second commitment recognizes that barriers continue to exist today and makes a commitment to identify steps toward removal and prevention of attitudinal, systemic, physical, communication and technological barriers. These are the five types of barriers to accessibility which are identified in the current research. This statement also acknowledges that individuals have multiple identity factors that intersect and will affect how diverse groups of people experience barriers and accessibility.
- As an employer, the third commitment is to take steps toward ensuring that people with disabilities have access to employment opportunities within the corporation and to employee services, as well as facilitating employment policies and practices that include reasonable accommodation for qualified applicants and current employees.
- As a funder, the fourth commitment is to encourage organizations who receive funding from the City of Edmonton to pursue the spirit and intent of the policy statements and principles. This will be outlined in grant parameters and defined in funding agreements for:
 - Programs and services;
 - Affordable housing; and
 - Community group led construction projects.
- The last commitment is about the City being a model for accessibility that encourages businesses, institutions, organizations, and community groups to incorporate accessibility and universal design in their organization's policies, goods, programs, services, communications, technology, and infrastructure.

The City of Edmonton is committed to pursuing these objectives through reasonable efforts on a go forward basis and within appropriate resource, budgetary, financial and other applicable parameters.

Policy Principles

The Policy outlines three principles to guide accessibility for people with disabilities including:

- *Alignment with accessibility principles:* The City has aligned with the accessibility principles contained within the United Nations Convention on the Rights of Persons with Disabilities and the new *Accessible Canada Act*. These principles are meant to promote, protect and ensure equitable enjoyment of all rights and freedoms, and respect for the inherent dignity of people with disabilities;
- *Commitment to Universal Design principles:* The City is committed to the internationally recognized principles of Universal Design, which are founded on the philosophy that accessibility is a fundamental condition of good design. An environment, program, service, engagement, communication and technology that is accessible, usable, convenient, and a pleasure to use, benefits everyone; and
- *Reasonable Accommodation:* Universal Design principles seek reasonable accommodation. Reasonable Accommodation means necessary and appropriate modifications and adjustments not imposing a disproportionate or undue hardship, where needed in a particular case, to ensure people with disabilities have equitable access.

Policy Purpose

In summary, the purpose of the Policy is to take steps to ensure people with disabilities are treated with respect, and have increased access and opportunities to participate and contribute. The City will facilitate this by considering individual needs and diverse abilities in the development and implementation of City policies, civic engagement, programs and services, communications and technology, employee services, and infrastructure.

Repeal of City Policy C463, C466, C589

City Policies C463 and C466 were approved in the early 1990s and did not complete the prescribed reviews outlined in the policies. Policy C589 was approved in 2016, but the content is better described and positioned in the new, overarching Policy. Repealing these three policies and creating an integrated all-encompassing Accessibility for People with Disabilities Policy C602 will support effective, streamlined policy implementation.

Work in progress and next steps

To provide guidance and direction to Administration on planning and implementation of the policy, an Administrative Directive (A1472) and Procedure have been developed, which will be finalized pending Council approval of the Policy. The Administrative Directive defines roles, responsibilities, and provides philosophical guidelines that must be applied when making decisions. The Administrative Procedure provides processes and links to guidelines that staff, contractors and consultants must follow.

Change management is in place to support the implementation of the Policy. The approach identifies priorities related to organizational support; systematic continuous improvement; and staff training. The highlights include:

- Establishment of internal committees that lead, support and champion the Policy, administrative directive and procedure;
- Development of orientation and training materials to educate City staff; and
- Review, refinement and/or establishment of corporate feedback and engagement tools, processes and activities to support community awareness and ongoing engagement of people with disabilities.

A key element of the Policy implementation will include evaluation of a three-year Corporate Accessibility Plan (“The Plan”). This approach is based on best practice research from other municipalities and orders of government. The Plan will help achieve the intent and commitments of the Policy and be based on the Corporate Business Plan’s programs and services. Each department will create accessibility actions through a three-step process that will become part of the Plan:

- Step 1: assessing current state of accessibility;
- Step 2: identifying barriers; and
- Step 3: establishing priorities and developing actions.

The initial Plan will be developed by October 2020. Administration will engage people with disabilities in plan development and build on current initiatives that work towards reducing and preventing barriers. The Plan will be reviewed and updated at a minimum of every three years.

Budget/Financial

Approval of the Policy itself will have no budget or financial implications. Existing resources will be used to support change management and development of the Corporate Accessibility Plan.

The Plan will identify priority actions that may be achieved through existing resources where possible. Additional budget requirements may be identified in the development and implementation of the Plan.

Public Engagement

Public engagement sessions were held to advise on the contents of the Policy. Feedback and perspectives collected were considered in drafting the final version of the Policy. The communications activities used to raise awareness and promote the public engagement process/activities included postcards, posters, newspaper advertisements, media, and social media, including Twitter and Facebook.

The Accessibility Advisory Committee provided Administration with advice throughout the Policy development, including reviewing drafts of the Policy and sharing expertise and experiences related to an effective and accessible public engagement approach.

The public engagement included and encouraged participation that reflects Edmonton's diverse population, particularly related to the disability community. Five drop-in public engagement sessions were held at accessible venues, one in each quadrant of the city, and one in the downtown core from February 26 to March 13, 2019. In addition to the drop-in sessions, a facilitated conversation was conducted with people with developmental disabilities with support from the Self-Advocacy Federation on March 26. In total, 123 members of the public were engaged in person.

Key features of the face-to-face public engagement included:

- The draft Policy was described on large boards in plain language and the public was invited to provide their feedback;
- Printed copies and braille copies of the boards were made available;
- Support services were available, including American Sign Language interpreters and Communication Access Real-time Translation services;
- If a member of the public required additional support during a session, a staff member guided them through what was presented, and wrote down their feedback; and
- If a member of the public required additional accommodation to participate they were provided an email address to make the request.

An online survey was made available as a shareable link, and through the Insight Community as an opt-in survey. The survey tool used by the City is e-reader compatible, and was accessible between February 26 and March 22, 2019; 640 respondents completed the survey.

Participants were asked to provide their feedback on the policy at the "Advise" level of the public engagement spectrum. The main themes of input from both in-person sessions and online surveys include:

- General support for the Policy, its commitments, principles and purpose. The

- Policy is a step in the right direction and focuses on the things that matter;
- High interest in seeing how the Policy will be implemented and what accountability will be in place;
 - Need to address barriers that impact daily living;
 - Need to educate staff and raise awareness of the importance of accessibility; and,
 - Need to ensure that accessibility is properly resourced to be able to realize the purpose of the Policy.

Based on public feedback, the Policy was adjusted including:

- Changes in the language throughout the Policy to acknowledge the contributions made by people with disabilities;
- Statement changed: from specific City funding programs to encouraging all organizations that receive funding from the City of Edmonton to pursue the spirit and intent of the policy statements and principles as outlined in the grant parameters and defined in the funding agreements; and
- Definitions added: for equitable and the five types of barriers (attitudinal, systemic, physical, communication and technological).

Corporate Outcomes and Performance Management

Corporate Outcome: Edmontonians are connected to the city in which they live, work and play.			
Outcome(s)	Measure(s)	Result(s)	Target(s)
Edmontonians are connected to the city in which they live, work and play.	Edmontonians' Assessment: Connected to Community (percent of survey respondents who feel connected)	47% (2017)	45% (2017)
Corporate Outcome: The City of Edmonton has a sustainable and accessible infrastructure.			
The City of Edmonton has sustainable and accessible infrastructure.	Edmontonians' Assessment: Access to amenities and services that Improve Quality of Life (% of survey respondents who strongly agree)	68% (2017)	70% (2018)

Risk Assessment

Risk Element	Risk Description	Likelihood	Impact	Risk Score (with current mitigations)	Current Mitigations	Potential Future Mitigations
If Not Approved						

Customer/ Citizens and Public Perception	If the Policy is not approved, the policies will remain outdated and insufficient to meet accessibility needs of the community and public perception will be negatively impacted as the City not being accessible.	2 - Unlikely	4 - Severe	8 - Medium	Approval is recommended.	Further work is required to update the existing policies as directed by Council.
If Approved						
Customer/ Citizens and Public Perception	Increased expectations for programs, services, communication, technology etc. to meet the needs of people who have a disability.	5 - Almost Certain	3 - Major	15 - High	Implementation of Policy uses a continuous improvement approach and prioritization of actions. Corporate feedback system established to respond to inquiries and requests.	Review of Accessibility Plan every three years to ensure the priorities for people with disabilities are reflected in the Corporate Accessibility Plan.
Financial	Insufficient resources are available for Policy implementation.	3 - Possible	3 - Major	9 - Medium	Implementation of Policy uses a continuous improvement approach and prioritization of actions.	Reallocation of resources from other lower priority programs, services, infrastructure, etc

Attachment

1. City Policy C602

Others Reviewing this Report

- K. Armstrong, Deputy City Manager, Employee Services
- G. Cebryk, Deputy City Manager, City Operations
- A. Laughlin, Acting Deputy City Manager, Financial and Corporate Services
- S. McCabe, Deputy City Manager, Urban Form and Corporate Strategic Development
- C. Owen, Deputy City Manager, Communications and Engagement
- R. Smyth, Deputy City Manager, Citizen Services
- B. Andriachuk, City Solicitor