



INTERNAL AUDIT REPORT

Accessibility Audit

August 2022

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CONCLUSION AND SUMMARY

In pursuance of AODA and industry best practices, several initiatives have been established to help govern the City's accessibility activities. The audit identified opportunities in the 2019 – 2022 Multi-Year Accessibility Plan (MYAP) cycle to improve management oversight and ensure risks related to the administration of the City's accessibility initiatives are efficiently and effectively mitigated. The following opportunities were identified:

- Strengthen overall governance and oversight of the City's accessibility initiatives.
- Improve the MYAP development and implementation process.
- Enhance accessibility training to promote accessibility knowledge and awareness.
- Incorporate in the MYAP regular independent accessibility assessments and certification.

In pursuance of AODA and industry best practices, several initiatives have been established to help govern the City's accessibility programs and initiatives. However, roles, responsibilities and accountability with respect to governance and oversight are not well defined. As a result, several examples of non-compliance with the AODA have been identified. Opportunities for improvement include ensuring better alignment of the AAC membership roles and responsibilities with the AODA requirements and assigning formal oversight roles and responsibilities for SLT-E over the City's accessibility program. Non-conformance with the AODA requirements may result in reputational damage to the City. Strengthening governance and oversight over the City's accessibility program and key processes such as customer feedback and accessibility policies will help mitigate these risks.

Pursuant to AODA, the City has established, implemented, maintained and document a multi-year accessibility plan, which outlines the City's strategy to prevent and remove barriers and meet its requirements under the regulation, and prepares an annual status report on the progress of measures taken to implement the plan. Opportunities were identified to ensure compliance with the AODA and improve the MYAP development process, including improved stakeholder consultation and gap analysis and ensuring responses provided to the Ministry in the Accessibility Compliance Report are complete and accurate.

The Accessibility Standards for Customer Service require that the City provide accessibility training to all employees and volunteers, anyone involved in developing policies and anyone who provides goods, services or facilities to customers on behalf of the City. While AODA training is part of the City's corporate policy training sessions for new employees, further improvement is necessary to ensure compliance with the Standards. The City requires in-house accessibility training expertise to develop and customize accessibility training for the various audiences.

Independent, external assessments can leverage industry expertise to identify and remedy gaps in accessibility compliance and best practices. Management undertook an independent assessment with a consultant to assess all of Vaughan's facilities for accessibility in November 2015. The City has also accomplished substantial achievements in the Rick Henson Foundation

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Accessibility Certification, a national rating system that measures and certifies the level of meaningful access of buildings and sites. However, there is a need for an independent accessibility assessment of City owned/operated open spaces, such as parks, playgrounds and recreational trails. Management has submitted an Information and Communication Compliance Project business case for consideration. This project will deliver a plan that will assess the current state and provide recommendations for implementation that will bring the City into compliance with Information and Communications Standards of AODA.

This audit was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing*.

During the audit, management has already taken steps to improve the processes. Internal Audit will follow up on the status of outstanding management action plans related to this audit and will report the status to a future Audit Committee meeting.

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BACKGROUND

The City of Vaughan is committed to treating all people in a way that allows them to maintain their dignity and independence. The City believes in integration and fair access for residents, visitors and employees with visible or non-visible disabilities. The City promises to meet the needs of people with disabilities in a timely manner by preventing and removing barriers to accessibility and supporting the goals of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

As a reflection of this commitment to advancing accessibility, Council approved the City's 2019 – 2022 Multi-Year Accessibility Plan, which identifies how the City will create a barrier-free community with universal access to its programs, services and facilities.

Since January 2021 the City's Diversity and Inclusion Officer provides direction to the Diversity and Accessibility Coordinator who oversees the implementation of the MYAP, and each portfolio and department is responsible for meeting compliance with AODA and achieving initiatives outlined in the MYAP. The City is currently in the process of developing a new five-year Accessibility Plan for the period of 2023 – 2027.

OBJECTIVES AND SCOPE

The objective of the audit is to evaluate the current state of the City's MYAP while assessing risks and identifying opportunities to help further the objectives of the creation of the new multi-year plan.

The audit approach included a review of the strategic goals, objectives and oversight of the accessibility initiatives, review of relevant programs, legislation, policies and procedures, use of technology, and interviews with external and internal stakeholders.

The scope of the audit will cover the relevant activities for the current 2019 – 2022 Multi-Year Accessibility Plan and the annual status reports.

This audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing.

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DETAILED REPORT

1. Strengthen Governance and Oversight over the City's Accessibility Initiatives

In pursuance of AODA and industry best practices, several initiatives have been established to help govern the City's accessibility activities. The City's Accessibility Advisory Committee (AAC) assists in the preparation and implementation of an Accessibility Plan, provides guidance, and addresses and identifies the needs of the community by the removal and prevention of barriers in the City of Vaughan's by-laws, policies, programs, practices, and services.

According to the Multi-Year Accessibility Plan (MYAP), the role of Senior Leadership Team Executive (SLT-E) is to provide direction to the Technical Advisory Committee (TAC) and along with City of Vaughan Council, establish priorities and determine resource allocation for the development and implementation of the Accessibility Plan initiatives.

The TAC is a staff committee with representation from all portfolios, departments and divisions from the City. It develops the MYAP for Council approval and ensures implementation of initiatives identified. It also communicates internally and externally on matters related to accessibility.

Our review of the governance and oversight processes identified the following non-compliance with the AODA and opportunities for improvement:

- The AODA requirement that a majority of the members of the AAC be persons with disabilities was not met.
- The current AAC mandate does not include the review of site plans and drawings described in Section 41 of the Planning Act that the committee selects, as required by AODA. While City staff delivered presentations to the AAC with regards to Carville Community Centre, Library and District Park and Block 18 District Park, currently there is no process to provide a listing of developments for the AAC's review. Management is committed to seek guidance from the Ministry for Senior and Accessibility (the Ministry) and best practices from other municipalities on this matter.
- There was no evidence of consultation with the AAC during the development process of the 2019 – 2022 MYAP. Limited communication was submitted for the Committee to exercise oversight on the preparation and implementation of the MYAP.
- Per discussion with a sample of AAC members, they expressed the desire for a more developed workplan and better-defined goals for the committee.
- Limited information was provided to SLT-E with regards to compliance with AODA requirements to facilitate their decision making.
- The TAC did not hold regular meetings until April 2022.

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- Subject matter experts, such as representation from Legal Services, do not sit on the AAC to provide the Committee with advice.
- Accountability and responsibilities are not well defined. There was no oversight to verify actual implementation status of accessibility initiatives.
- Lack of governance and oversight also contribute to other issues discussed later in the report.

Per discussion with management, resource constraints and lack of relevant expertise are cited as the primary causes of the issues identified. A siloed, decentralized approach is followed without clearly defined oversight, responsibilities and accountabilities. The absence of a central governance structure and oversight process increases the risk of non-conformance with the AODA requirements.

Since the commencement of the audit, management has taken steps to strengthen the overall governance and oversight.

Recommendations

We recommend that management:

- Develop strategies to improve the AAC member recruitment process in accordance with AODA requirements.
- Review the current AAC Terms of Reference with reference to the AODA requirements and bring forward any required amendment for Council consideration.
- Following Ministry guidance and best practices of other municipalities, implement a process whereby the AAC is provided a list of site plans to select plans for review. The AAC can review and request staff to provide further information on documents in pursuance of AODA requirements.
- Include representation from Legal Services and any other relevant subject matter experts to better support the AAC.
- Consult with AAC members and assist with the preparation of annual workplans.
- Provide regular updates to the AAC and SLT-E on accessibility initiatives.
- Implement a process to monitor ownership and accountability and verify MYAP implementation status.

Management Action Plan

Management agrees with the recommendations.

- OCHRO will work with the Office of the City Clerk and Corporate and Strategic Communications department to improve the AAC member recruitment process by utilizing a targeted approach to ensure that the majority of AAC members identify as living with disabilities. The process will include a scoring matrix and eligibility criteria to ensure that the city has appropriate lived expertise and subject matter expertise represented on the committee. (Q4, 2022)
- The OCHRO will work with the Office of the City Clerk to develop the AAC Terms of Reference with reference to the AODA requirements. OCHO will develop an onboarding package to ensure that the AAC is aware of its roles and responsibilities. The amendments will be brought forward for Council consideration. (Q4, 2022)
- OCHRO will continue to engage the Ministry for Senior and Accessibility for guidance and will initiate an environmental scan to benchmark best practices of other municipalities and implement a process with the AAC that allows the committee to select from a list of site plans for review. (Q4 2022 to Q1 2023)
- OCHRO will work with the Legal Services department and other relevant departments to provide relevant subject matter experts to support the AAC better. (Q4, 2022)
- OCHRO is consulting with the current and incoming AAC members in developing the 2023-2027 MYAP and will engage the incoming AAC to prepare annual status reports and set annual workplans. (annual and ongoing)
- OCHRO will work with the Office of the City Clerk to engage the Council and incoming AAC to request a standing agenda item to provide updates on accessibility initiatives. (Q1, 2023)
- OCHRO will develop a governance and reporting structure to be included in the 2023-2027 MYAP that provides SLT-E with regular updates on accessibility initiatives. (Q4 2023)
- In developing the 2023-2027 MYAP, a process to identify and address barriers to accessibility has been implemented. The process includes identifying key stakeholders and assigning responsibility. These efforts will form the foundation of the process to monitor ownership and accountability and verify MYAP implementation status required to develop the Annual Accessibility Status Report. (ongoing)

2. *Improve the MYAP Development and Implementation Process*

Pursuant to AODA, the City shall establish, implement, maintain and document a multi-year accessibility plan, which outlines the City's strategy to prevent and remove barriers and meet its requirements under the regulation, and prepare an annual status report on the progress of measures taken to implement the plan. The City must file an accessibility compliance report every two years with the Ministry to confirm it has met its current accessibility requirements under the AODA. The Provincial Government accessibility web page provides guidance and self-assessment tools to assist in creating the multi-year accessibility plan.

The Vaughan 2019 – 2022 MYAP was prepared using Information and statistics submitted by City departments and gathered from other stakeholders.

Our review of the process to develop the 2019 – 2022 MYAP identified the following:

- Responses to certain Accessibility Compliance Report questions appear to be inaccurate or incomplete with regards to AAC members and responsibilities, public consultation, accessibility training and the customer feedback process. While management's responses indicated that the City was in compliance with the AODA in these aspects, gaps were identified during the audit. For example, management responded that the majority of the AAC members are persons with disabilities, however, the audit identified that only two out of the ten current AAC members identify themselves as persons with disabilities.
- While the MYAP was prepared using information submitted by City departments, the Provincial self-assessment tools were not utilized to perform a gap analysis.
- The current MYAP categorizes strategies and action items by City service portfolios/departments and does not display clear connection between accessibility initiatives and the AODA Standards.
- There was no evidence of consultation with the AAC or persons with disabilities during the development process of the 2019 – 2022 MYAP as required by AODA.
- Documentation and communications were not centrally maintained to support the preparation of the MYAP.

Opportunities exist to collaborate with other City projects and programs on accessibility initiatives. The absence of stakeholder consultation and inaccurate responses within the Accessibility Compliance Report submission could constitute non-compliance with AODA, which could result in financial penalties and reputational damage to the City. Without a proper gap analysis, management could fail to have a holistic view of the City's overall accessibility status, resource needs and priorities.

Since the commencement of the audit, management has taken steps to improve the MYAP development process.

Recommendations

We recommend that management:

- Correct errors in the Accessibility Compliance Report and refile it with the Ministry.
- Improve oversight over the preparation of future Accessibility Compliance Reports to ensure responses are accurate and complete.
- Utilize self-assessment tools to perform a gap analysis and determine the City's overall accessibility gaps, resource needs and priorities.
- Follow industry best practices and develop the new MYAP with clear connection with AODA Standards.
- Establish desired outcomes to measure achievement of accessibility goals and initiatives.
- Assign responsibility and develop a work schedule that aligns with compliance deadlines for Ontario's accessibility laws and the City's priorities.
- Implement the engagement strategy and conduct stakeholder consultation as required by AODA Standards.
- Collaborate with accessibility initiatives in other City projects and programs when developing the new MYAP.

Management Action Plan

Management agrees with the recommendations.

- OCHRO has engaged the Ministry for Senior and Accessibility to refile the 2021 Accessibility Compliance Report. (Q4, 2022)
- OCHRO is continuing to determine status, ownership and accountability for the 2019-2022 MYAP, and will continue to monitor and verify progress critical to developing the Annual Accessibility Status Report. (Q1, 2023)
- The current Technical Advisory Committee (TAC) with representation from all departments, will have a key role in the preparation of future Accessibility Compliance Reports to ensure responses are accurate and complete. The OCHRO will work with SLT-E to develop a process to ensure accountability and oversight over the Accessibility Compliance Reports. (Q2, 2023)
- OCHRO will utilize self-assessment tools to perform a gap analysis and determine the City's overall accessibility gaps, resource needs and priorities on an annual basis to coincide with the development of the Annual Accessibility Status Report. (Q4, 2022 forward)

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- OCHRO has completed an environmental scan of municipal best practices and will utilize the information gathered to develop the 2023-2027 MYAP with a clear connection with AODA Standards. (Q2, 2023)
- OCHRO, with TAC, will engage the Office of Transformation and Strategy and the Program Management Office set S.M.A.R.T outcomes to measure the achievement of accessibility goals and initiatives for the 2023-2027 MYAP. (Q1, 2023)
- OCHRO will work with TAC to assign responsibility and develop a work schedule that aligns with compliance deadlines for Ontario's accessibility laws and the city's priorities. (ongoing)
- OCHRO will continue to engage Corporate and Strategic Communications department to utilize the City's Engagement Strategy to conduct stakeholder consultation as required by AODA Standards. OCHRO will also utilize the existing Employee Engagement Survey to consult with internal stakeholders, specifically staff identifying as living with disabilities. (Q4, 2022 – Q1, 2023)
- OCHRO will continue to engage TAC to identify and track accessibility initiatives in other City projects and programs when developing the new MYAP. (ongoing)

3. Enhance Training to Promote Accessibility Knowledge and Awareness

The Accessibility Standards for Customer Service require that the City must provide accessibility training to all employees and volunteers, anyone involved in developing policies and anyone who provides goods, services or facilities to customers on behalf of the City. Training must be provided as soon as possible after an employee or volunteer joins the organization, and when there are any changes to the accessible customer service policies. Staff must be trained on areas of accessibility standards that are relevant to their work responsibilities. Training records must be maintained. The Provincial Government accessibility web page provides guidance and self-assessment tools to assist in identifying training needs.

Pursuant to the legislations, the City has incorporated a training requirement within the Accessibility Policy and training sessions are provided to new employees.

Our review of the accessibility training and resource management processes identified the following:

- Self-assessment tools were not fully utilized to identify training requirements and needs.
- Accessibility training has not been provided to members of Council and AAC members.
- While certain departments, such as Recreation Services, provide customized accessibility training, only general training was provided to other staff.
- Due to the absence of formal training materials, Internal Audit was not able to verify whether the training material covers all specific matters required by the legislation.
- Training was not provided on an ongoing basis in connection with changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities.
- Training records were not maintained for the virtual training sessions held during the pandemic.
- Discussions with various stakeholders also identified the needs for improvements in accessibility training.
- Currently there is no process to assess and monitor accessibility resources and expertise needs in the City. There are no backup resources when the Accessibility and Diversity Coordinator is away.

Per discussion with management, resource constraints and lack of relevant expertise are cited as the primary causes of the issues identified. The City requires in-house accessibility training expertise to develop and customize training for the various audiences. There are health and safety, reputational, and financial risks, and non-compliance with AODA if staff do not know

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what they are supposed to do or how they are expected to perform their duties with regards to AODA requirements.

Since the commencement of the audit, management has taken steps to improve the training and resource management processes.

Recommendations

We recommend that management:

- Follow best practices and utilize self-assessment tools to determine the City's overall training requirements and resource needs.
- Acquire necessary resources and expertise to develop and deliver accessibility training to all parties as required by the AODA Standards.
- Implement a process to maintain accessibility training records as per AODA requirements.
- Establish a process to assess and monitor accessibility resources and expertise needs in the City on an ongoing basis.

Management Action Plan

Management agrees with the recommendations.

- Engage the Learning and Organizational Development team to employ best practices and utilize self-assessment tools to determine the City's overall training requirements and resource needs. (Q4, 2023)
- OCHRO has secured general AODA e-Learning and implemented training for all staff, volunteers, and external third parties. OCHRO is utilizing existing capital funds to procure information and communication accessibility training (Q1, 2023). Furthermore, OCHRO will work with the Learning and Organizational Development team to ensure that accessibility training is available to all parties as required by the AODA Standards. (Q1, 2024).
- OCHRO has also developed and implemented a digital tracking system to track and implement a process to maintain accessibility training records per AODA requirements and will use this information in addition to the self-assessment tools to help assess and monitor accessibility resources and expertise needs in the city on an annual basis.

4. *Incorporate Regular Independent Accessibility Assessments and Certification into the Development of Future MYAP's*

Facility assessments performed using independent expertise can help the City assess the existing condition as they relate to accessibility and identify issues and opportunities to improve accessibility within the City. A web accessibility assessment determines whether a website is reasonably accessible for users with disabilities. The purpose of the assessment is to identify barriers that prevent people from using the internet in a way that aligns with their abilities and preferences.

In November 2015, the City undertook an independent assessment with a consultant to assess all of Vaughan's facilities for accessibility, which identified a number of priority accessibility projects and recommendations for these facilities.

The Rick Henson Foundation (RHF) Accessibility Certification is a national rating system that measures and certifies the level of meaningful access of buildings and sites. Up to the date of this report, the City has achieved a total of 23 RHF certified sites, including nine Gold certified sites, two Gold certified Pre-Construction sites, and 12 Accessibility certified sites.

Our review of this process identified the following:

- The City has not performed independent accessibility assessment of City owned/operated open spaces, such as parks, playgrounds and recreational trails.
- There is decentralized website governance, under which departments have the ability to post content which may not be adhering to accessibility requirements. In addition, the digital web page auditing tool acquired by the City was not fully utilized to monitor on-page and technical accessibility issues and errors.

While some recommendations of the 2015 facility assessment were implemented along with the RHF certification process, management will benefit from a formal tracking and follow-up process for past and future assessments.

While the City's website is on a path to meet full compliance (excluding PDF documents) by end of Q3 2022, a current state assessment will provide a comprehensive picture of the accessibility ecosystem in order to identify gaps and barriers and develop recommendations towards the desired target state.

Independent, external assessments can leverage industry expertise to identify and remedy gaps in accessibility compliance and best practices. Management has submitted an Information and Communication Compliance Project business case for consideration. This project will deliver a plan that will assess the current state and provide recommendations for implementation that will bring the City into compliance with Information and Communications Standards of AODA.

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Recommendations

We recommend that management:

- Incorporate regular independent accessibility assessments and certification into the development of the next and future MYAP's.
- Once approved, execute the plan to assess the current state and provide recommendations that will bring the City into compliance with Information and Communications Standards of AODA, including the utilization of existing tools.
- Complete independent accessibility assessments on existing parks, playgrounds and recreational trails, including facilities and signage, and incorporate the assessment into updates of parks and open space planning and development.
- Establish a formal tracking process of recommendations proposed by prior and future accessibility assessments and ensure proper follow-up actions.
- Perform routine walk-throughs of the facilities help to monitor and measure progress and identify any gaps.

Management Action Plan

Management agrees with the recommendations.

- OCHRO will work with relevant departments to establish a process and vendor to conduct regular independent accessibility assessments of City-owned assessments (including buildings, existing parks, playgrounds and recreational trails, facilities and signage) as part of the upcoming 2023-2027 MYAP action items. (Q2, 2022 – Q4, 2027). The accessibility assessment will be absorbed into the upcoming 2023-2027 MYAP and future MYAP's.
 - OCHRO will work with the relevant stakeholders to incorporate the resulting assessment on existing parks, playgrounds and recreational trails, facilities, signage, and open spaces in the planning and development updates. (Q3 2024)
- OCHRO has submitted a business case for a consultant to conduct a current state assessment and provide recommendations that will bring the City into compliance with Information and Communications Standards of AODA, including the utilization of existing tools. Once approved, OCHRO will establish a working committee to execute the plan. (Q3, 2023)
- As part of the MYAP, the OCHRO will establish a formal tracking process of existing and future accessibility recommendations to track and measure actions. (Q2, 2023)
- OCHRO will work with Facility Management department to establish routine accessibility walk-throughs of the facilities to monitor and measure progress and identify gaps. (Q3, 2023)

5. *Improve Management Oversight over the Customer Feedback Process*

Under the Accessibility Standard for Customer Service, there is a requirement for the City to establish a customer service feedback process about the manner in which the City provides goods or services to people with disabilities. The City must make the feedback process accessible. The City's Accessibility Policy requires that feedback be invited, forwarded to the appropriate personnel, responded to, documented and tracked.

Our review of this process identified the following:

- While the Accessibility and Diversity Coordinator responded to the accessibility feedback, it was not documented or tracked. Outcomes were not measured or analyzed.
- There was no process in place to ensure accessibility feedback was responded to when the Accessibility and Diversity Coordinator was absent.
- The online Customer Feedback Form is outdated and would not meet accessibility standards. As a result, it has not been utilized.
- There was no process in place to gauge public satisfaction with the City's accessibility initiatives.

These observations could constitute non-compliance with AODA as the City may not have sufficient information to gauge public satisfaction with the accessibility program.

Since the commencement of the audit, management has taken steps to improve the customer feedback process.

Recommendations

We recommend that management:

- Improve management oversight over the customer feedback process. Follow industry best practices and put in place a process to ensure accessibility complaints and feedback is properly responded to, documented and tracked.
- Periodically review information gathered from accessibility complaints and feedback, with the objectives of identifying any opportunities of improvement to accessibility and future MYAP.
- Implement community and stakeholder engagement plans to gather information that gauge satisfaction with the City's accessibility program, utilizing tools such as Citizen Satisfaction and Staff Surveys.

Management Action Plan

Management agrees with the recommendations.

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- OCHRO will benchmark best practices for receiving and tracking accessibility complaints and feedback. (Q4, 2022). OCHRO has developed a tracking document to improve management oversight over the customer feedback process and will develop a process to ensure that at minimum, TAC, SLT-E and AAC are provided biannual updates. (Q4, 2022)
- OCHRO will periodically review information gathered from accessibility complaints and feedback with TAC with the objectives of identifying any opportunities for improvement to accessibility and informing future MYAP. (Q3, 2023)
- OCHRO will engage the Corporate and Strategic Communications department and utilize existing tools and pathways, such as Citizen Satisfaction and Staff Surveys, to ensure that all community and stakeholder engagement plans to gather information that gauge satisfaction with the city's accessibility program. (Q4, 2022 to Q1, 2023)

6. *Implement and Record Periodic Reviews of Accessibility Policies*

Under the AODA the City shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in the legislation. The Provincial Government accessibility web page provides guidance and best practices to assist in developing and maintaining accessibility policies.

In pursuance of the AODA, the City has developed relevant accessibility policies and standards.

Our review of this process identified the following:

- While the Accessibility Policy has been reviewed and updated with Legal Services' assistance, and there is a plan to review the Customer Service Policy, no formal review and update cycle has been established for the City's accessibility policies. Per discussion with Legal Services, regular formal reviews of the accessibility policies and standards are needed to ensure AODA compliance. Best practice would be a review whenever there are amendments to the AODA and the Standards, requested by the AAC or at least every five years. Most Human Resources policies require annual review and therefore the accessibility policies and standards should be reviewed annually, if possible.
- It was confirmed that the City has not received a claim specific to the AODA, however, there was no process in place to measure compliance with accessibility policies and standards.
- There is a need to review other City and department policies, with the objectives of modifying or removing any policies that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities.

Properly developed policies and procedures help City staff and management understand the AODA requirements, their roles and operational expectations in implementing the City's MYAP, and the way to interact with persons with disabilities in their daily operations.

Recommendations

We recommend that management:

- Collaborate with Legal Services and implement and record periodic reviews, which provides support for management oversight and assurance the policies reflect current AODA legislations and operational needs.
- Implement the plan to review the existing policies and procedures using an accessibility lens on City and departmental level.
- Establish a process to assess, monitor and measure accessibility policy compliance.

Management Action Plan

Management agrees with the recommendations.

- OCHRO will engage Legal Services to determine a schedule of policy reviews to ensure that policies reflect current AODA legislation and operational needs. (Q1, 2023)
- OCHRO will engage TAC to develop a schedule to review key/relevant policies using an accessibility lens at the City and departmental level. (Q4, 2023)
- OCHRO will monitor and measure accessibility policy compliance by ensuring that the policies are reviewed annually, staff and management understand and fulfill their roles and responsibilities under the City's accessibility policies and procedures and MYAP, and develop a process for tracking, monitoring and analyzing the number of issues/complaints received. (Q1, 2024)