# **City of Toronto 2025-2029 Disability Inclusion Action Plan**

Equity and Accessibility Section, People and Equity Division





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## **Land Acknowledgement**

The City of Toronto acknowledges that all facets of its work are carried out on the traditional territory of many nations including the Mississaugas of the Credit, the Anishnabeg, the Chippewa, the Haudenosaunee and the Wendat peoples and is now home to many diverse First Nations, Inuit, and Métis peoples. We also acknowledge that Toronto is covered by Treaty 13 with the Mississaugas of the Credit, and the Williams Treaties signed with multiple Mississaugas and Chippewa bands. We are eternally grateful for Indigenous stewardship of these lands and waters.

## **African Ancestral Acknowledgement**

The City of Toronto acknowledges all Treaty peoples, including those who came here as settlers, as migrants either in this generation or in generations past, and those of us who came here involuntarily, particularly those brought to these lands as a result of the Trans-Atlantic Slave Trade and Slavery. We pay tribute to those ancestors of African origin and descent.

## **Commitment to Creating an Accessible City**

The 2025-2029 Disability Inclusion Action Plan outlines goals and initiatives that reaffirm the City's Commitment to Creating an Accessible City and advance building an equitable and inclusive society that values the contributions of people with disabilities.

The City is committed to identifying, removing, and preventing accessibility barriers. The City will provide an accessible environment in which employees, residents and visitors with disabilities can access City programs, services, and facilities, including buildings, public spaces, information and communications, in a way that meets their individual needs.

The City is equally committed to supporting City employees through advice, policies, tools, resources, and accountability frameworks that promote an inclusive workplace and help employees deliver accessible programs, services, and facilities.

<sup>&</sup>lt;sup>1</sup> Accessibility barriers can include any of the following types of barriers:

Attitudinal barriers include negative attitudes and assumptions about persons with disabilities.

Systemic barriers include policies and procedures that create barriers to full inclusion.

<sup>•</sup> Information, communication, and technology barriers include communication formats that are not available in accessible formats (e.g., screen reader compatible, braille, plain language, etc.)

Physical and environmental barriers include elements in the physical environment that create barriers for persons with disabilities (e.g., lack of a ramp or elevator to access different levels, door widths that prohibit access for users of mobility devices). For more information see: Disability Inequities.

#### Introduction

Under the <u>Accessibility for Ontarians with Disabilities Act, 2005</u> (AODA) municipalities are required to develop accessibility plans that outline how they will continue to improve accessibility and work towards implementing their <u>public commitment to accessibility</u>. The City of Toronto's 2025-2029 Disability Inclusion Action Plan (DIAP) is a five-year plan that aims to identify, remove, and prevent accessibility-related barriers that impact people with disabilities when accessing City programs, services, and spaces.

The DIAP was informed by consultations with people with disabilities, support persons, community organizations, City staff (with and without disabilities), and the Toronto Accessibility Advisory Committee (TAAC). City divisions were consulted on recommended actions, the scope of each action, implementation timelines, and program area accountability. Key findings from the consultations are summarized in <a href="Appendix A">Appendix A</a>.

The overarching goal of the DIAP is to promote accessibility by design and disability inclusion across the organization through new commitments and actions in the following areas:

- Leadership and Accountability
- Training and Skills Development
- Budget and Procurement
- Equitable Services
- Equitable Employment
- Information, Communication and Technology
- Facilities and Public Spaces
- Transportation<sup>2</sup> (Ferries and on-demand taxi services)

In addition to the actions outlined in the DIAP, City divisions are expected to meet legislated obligations as outlined in the City's <u>Corporate Accessibility Policy</u>. All City divisions are required to participate in annual reporting on AODA compliance requirements and any progress made towards implementing the actions included in the DIAP. Information gathered during annual reporting will be used to develop status reports and to monitor the City's AODA compliance status. Annual status reports will be made available on the <u>City's Internet</u>.

## A Note about Language and Identity

The City of Toronto acknowledges that language can significantly affect how residents understand and engage with the City. As a public sector organization, the City strives to

<sup>&</sup>lt;sup>2</sup> The Toronto Transit Commission (TTC) is responsible for conventional (bus and subway networks) and specialized transit (Wheel-trans) within the City of Toronto. TTC maintains an independent multi-year plan and reports directly to the Province of Ontario on AODA compliance. Visit the <u>TTC's Accessibility webpage</u> for details.

implement human rights-based principles in our systems, programs, and processes. The DIAP uses "people-first" language throughout, consistent with the <u>Ontario Human Rights</u> <u>Code</u> and the AODA (i.e. people with disabilities).<sup>3</sup> However, it is important to recognize that people may prefer to use identity-first language (i.e. disabled people) and that identity-based language evolves over time.<sup>3,4</sup> People may also face accessibility barriers or have accessibility needs but not self-identify as disabled.

The DIAP further acknowledges that disability is often viewed from medical and colonial perspectives, which support ableist assumptions and systems.<sup>5</sup> Disability is experienced in relation to cultural and social contexts. Many Indigenous languages for example, do not have a word for disability. Rather than focusing on what may be perceived as deficits, people are understood to develop their capacities in relation to their culture, gifts, and the responsibilities they hold in their communities.<sup>6</sup>

For the purposes of the DIAP, disability inclusion means ensuring that people with disabilities have the same opportunities and benefit equally in our society. We approach this work using a social model of disability which views disability as resulting from a mismatch between a person and their environment, both physical and social. It is therefore our environment, attitudes and systems that create barriers for people, not their disability. <sup>7</sup>

<sup>&</sup>lt;sup>3</sup> People-first language is used in the Convention on the Rights of Persons with Disabilities and emphasizes the person, not the disability, by placing a reference to the person or group before the reference to the disability. https://www.ungeneva.org/sites/default/files/2021-01/Disability-Inclusive-Language-Guidelines.pdf

<sup>&</sup>lt;sup>4</sup> Solomon, R., & Buliung, R. Rebuilding the Table: Disability and Public Engagement. City of Toronto.

<sup>&</sup>lt;sup>5</sup> Ableism" refers to attitudes in society that devalue and limit the potential of persons with disabilities. The Law Commission of Ontario has stated: [Ableism] may be defined as a belief system, analogous to racism, sexism or ageism, that sees persons with disabilities as being less worthy of respect and consideration, less able to contribute and participate, or of less inherent value than others. Ableism may be conscious or unconscious, and may be embedded in institutions, systems or the broader culture of a society. It can limit the opportunities of persons with disabilities and reduce their inclusion in the life of their communities. https://www3.ohrc.on.ca/en/policy-ableism-and-discrimination-based-disability/2-what-disability# edn35

<sup>&</sup>lt;sup>6</sup> Ineese-Nash, N. (2020). Disability as a Colonial Construct: The Missing Discourse of Culture in Conceptualizations of Disabled Indigenous Children. Canadian Journal of Disability Studies, 9(3), 28–51. https://doi.org/10.15353/cjds.v9i3.645

<sup>&</sup>lt;sup>7</sup> Olkin, R. (2022, March 29). *Conceptualizing disability: Three models of disability.* American Psychological Association. <a href="https://www.apa.org/ed/precollege/psychology-teacher-network/introductory-psychology/disability-models">https://www.apa.org/ed/precollege/psychology-teacher-network/introductory-psychology/disability-models</a>

## **Guiding Principles**

The following principles guide the City of Toronto's actions, decision-making and approaches pertaining to the delivery of City of Toronto programs, services, facilities, and public spaces.

## 1. Leadership and Accountability

The City of Toronto will lead by example in striving for maximum accessibility over minimum compliance. Leaders in all areas and at all levels of the organization are accountable for advancing accessibility within their areas of responsibility.

#### The City will:

- Foster a culture of equity and disability inclusion within the City as an organization and throughout the communities it serves by challenging assumptions and biases when planning and delivering City programs, services, and facilities.
- Recognize and address ablism which includes discriminatory systems, processes, and behaviours.
- Maintain an accountability and compliance framework to ensure accessibility goals are achieved.

## 2. Collaboration and Engagement

Addressing accessibility barriers requires a collaborative approach and is a shared responsibility of City Divisions, staff, City Council and Torontonians. Accessible engagement processes will help the City make informed decisions and build stronger relationships with the communities the City serves.

#### The City will:

- Commit to ongoing, meaningful engagement with its employees, residents and visitors with disabilities when designing and implementing City of Toronto programs, services, facilities and public spaces.
- Consult with the <u>Toronto Accessibility Advisory Committee</u> as required by the AODA on decisions related to the accessibility of City services, programs, facilities and public spaces.
- Consult with Divisional Program Advisory Committees and accessibility stakeholders.
- Ensure that employee and public engagement activities are inclusive and accessible.
- Ensure City divisions work together to align and advance disability-related priorities.

## 3. Respect and Dignity

City of Toronto programs, services and facilities will be provided to people with disabilities in a manner that respects their dignity, personal experiences and individual needs.

#### The City will:

- Create and maintain a culture of dignity and respect for all City employees, residents and visitors with disabilities.
- Provide services in a caring, compassionate, non-judgmental manner, free from discrimination and harassment.
- Respect the independence of its employees, residents, and visitors with disabilities by enabling access to City programs, services, facilities and public spaces.

## 4. Equity and Inclusion

The City of Toronto will ensure that everyone can access our programs, services, facilities, and public spaces. Where needed, individual needs will be met to ensure people with disabilities can obtain, use, or benefit equally from all programs, services, facilities and/or public spaces.

#### The City will:

- Ensure staff have access to training that promotes their capacity to advance accessibility and disability inclusion.
- Ensure people with disabilities can access and benefit from the same programs, services, facilities and public spaces as others, in an equitable way.
- Proactively provide accessible formats, communication supports and offer accommodations when needed to ensure equitable outcomes.
- Take an approach that acknowledges the impacts of ableism and intersectionality during all stages of policy, planning and delivery of programs, services and facilities.

## 5. Accessibility by Design

A barrier-free environment is achieved when accessibility is intentionally incorporated into the budget and design of all City planning, procurement and implementation of City programs, services, facilities and public spaces to address the diverse needs of all employees, residents and visitors.

The City will:

- Consider equity and accessibility in budgeting processes, specifically in state of good repair and capital planning.
- Incorporate accessibility in the earliest project planning stages and throughout the design, development, implementation and procurement of City programs, services and facilities.
- Create permanent inclusive solutions ensuring accessibility for persons with disabilities is not an afterthought.
- Ensure accommodation processes incorporate an approach that recognizes and addresses accessibility barriers.

## 6. Innovation and Adaptability

The City of Toronto seeks new approaches and solutions to accessibility and adapts to new technologies that facilitate increased participation of City employees, residents and visitors with disabilities.

#### The City will:

- Take a holistic approach that recognizes that accessibility solutions may need to address multiple barriers and that a single solution might not meet the accessibility needs of everyone.
- Seek to embed an accessibility lens towards continuous improvement of processes and procedures.
- Investigate technologies, products and services that will improve accessibility for City employees, residents and visitors with disabilities.

## **Disability in the City of Toronto**

Toronto is Canada's largest and most diverse city and home to over 570,000 people with disabilities<sup>8</sup> and 477,000 seniors<sup>9</sup>. As of 2022, 1 in 4 (or 25% of) Torontonians aged 15 years or older report having a disability, representing an increase of 3% from 2017 to 2022.<sup>8</sup>

In addition, the number of people with access needs continues to increase as the City of Toronto's demographics shift to a larger proportion of people aged 65 and older. Seniors aged 65 and over are more likely than other age groups to have a disability. In 2022, 43% of Toronto seniors over the age of 65 indicated that they had one or more disabilities. As the population continues to age and more people are living longer, it is expected that by 2041 there will be over 800,000 adults aged 65 years and older, representing a 50% increase compared to data available from 2021.

As an organization that values diversity and human rights, the City of Toronto strives to build an inclusive city where people with disabilities can expect and experience equitable outcomes. We recognize that people with disabilities continue to be negatively impacted by physical, environmental, systemic and social barriers including ableism. As a result, people with disabilities often experience marginalization, exclusion and social inequities in our communities. Inequities include lower employment rates, income levels, access to accessible housing, employment, food and necessary supports which can be further compounded by intersecting systems of oppression such as racism, sexism, ageism etc.

Recent data from the 2022 Canadian Survey on Disability showed that within the City of Toronto the employment rate for people with disabilities, aged 15 years and over was 41% compared to 59% for those without a disability. Further to this, people with disabilities were more likely to earn less income compared to those without disabilities, with most Torontonians with a disability (60%) earning less than \$40,000 per year. Broken down further, 32% earned between \$20,000-\$39,999 per year while 28% earned under \$20,000. Based on the 2023 Market Basket Measure threshold for a single adult in Toronto (\$28,766), someone with a disability needs to earn a minimum income of \$37,395 to meet basic living costs (food, shelter) however, additional costs are often required for people to have positive

<sup>8</sup> Statistics Canada. 2025. Canadian Survey on Disability, 2022 Toronto Level Data (Table). 2022 SCS-902 / CAS-1159257.

<sup>&</sup>lt;sup>9</sup> Statistics Canada. 2023. (table). *Census Profile*. 2021 Census of Population. Statistics Canada Catalogue no. 98-316-X2021001. Ottawa. Released November 15, 2023. <a href="https://www150.statcan.gc.ca/n1/en/catalogue/98-316-X2021001">https://www150.statcan.gc.ca/n1/en/catalogue/98-316-X2021001</a>

<sup>&</sup>lt;sup>10</sup> Statistics Canada – Censuses of Population, 1971-2016 Census Profiles Toronto Census Division and Ontario Ministry of Finance, Ontario Populations Projections Update, Spring 2018 (Based on the 2011 Census) 2017-2041

<sup>&</sup>lt;sup>11</sup> Inequities refer to unfair and avoidable differences in service access, experiences, impacts and outcomes. Socio-demographic data is a critical tool to understand who our service users are and if any socio demographic groups are disadvantaged or require additional supports. <a href="https://www.toronto.ca/city-government/accessibility-human-rights/equity-diversity-inclusion/data-for-equity/">https://www.toronto.ca/city-government/accessibility-human-rights/equity-diversity-inclusion/data-for-equity/</a>

health outcomes. <sup>12</sup> Research by the Wellesley Institute demonstrates the resources required to thrive with a disability in the City of Toronto can cost up to 39% more than thriving without a disability. <sup>12</sup> For more information on types of disability-related barriers and inequities, refer to Appendix B.

Figure 1: Disability Rates in the City of Toronto by Age Category based on the 2022 Canadian Survey on Disability<sup>8</sup>

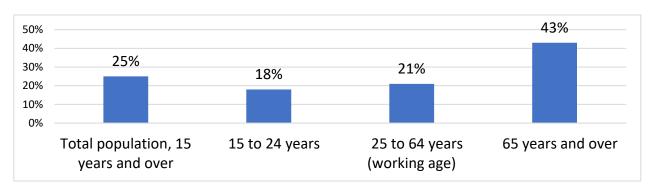
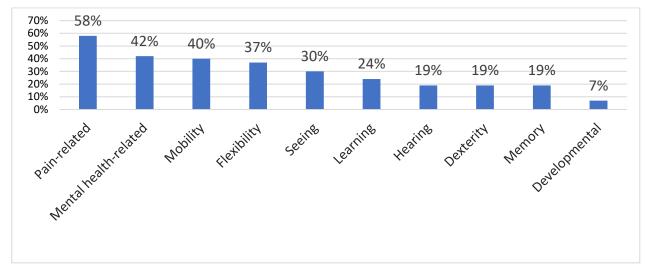


Figure 2: Types of Disabilities reported by Torontonians aged 15 years and over, through the 2022 Canadian Survey on Disability<sup>8</sup>



<sup>&</sup>lt;sup>12</sup> Yin, Y.-L., Balasubramaniam, A., & Sheppard, C.L. (2024). *Thriving in the City with a Disability: What does it cost to live a healthy life?* Wellesley Institute. <a href="https://www.wellesleyinstitute.com/in-the-news/media-release-thriving-in-the-city-with-a-">https://www.wellesleyinstitute.com/in-the-news/media-release-thriving-in-the-city-with-a-</a>

disability/#:~:text=In%20Toronto%2C%20living%20a%20healthy,disability%20versus%20%2484%2C000%20w ithout%20one.

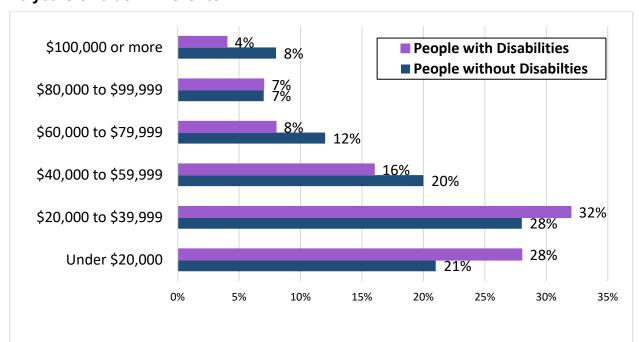


Figure 3: Breakdown of After-tax Income for People with and without Disabilities, aged 15 years or older in Toronto<sup>8</sup>

#### 2025-2029 Actions

## 1) Leadership and Accountability

The City has developed a robust policy framework to meet and exceed the general requirements of the Integrated Accessibility Standards Regulation (IASR) under the Accessibility for Ontarians with Disabilities Act (AODA) that includes:

- The City's <u>Statement of Commitment to Creating an Accessible City</u>, adopted by City Council in August 2009,
- The <u>City of Toronto Corporate Accessibility Policy</u>, adopted by City Council in June 2018 and updated in 2021 and,
- The City's previous <u>2020-2024 Multi-Year Accessibility Plan</u> (MYAP), adopted by City Council in December 2019 and this 2025-2029 Disability Inclusion Action Plan.

In addition to these fundamental components, the City is committed to an additional eight actions that focus on strengthening accountability and embedding equity and disability inclusion intentionally into City work.

The goals of these actions are to:

- Ensure the City has clear roles and accountabilities for advancing accessibility across the organization.
- Foster a culture of equity and inclusion that values and proactively includes employees, residents and visitors with disabilities.

To meet these goals, the City of Toronto will:

- 1.1 Establish an accountability framework to oversee the implementation of the 2025-2029 Disability Inclusion Action Plan, which will include publication of annual status reports on progress made to advance disability inclusion at the City. (**People and Equity**)
- 1.2 Demonstrate the City of Toronto's commitment to equity and accessibility by having, all divisions represented on the Interdivisional Equity and Accessibility Committee.

  The committee will participate in annual reporting on AODA compliance, progress on this Action Plan and share initiatives and leading practices across the organization.

  (all divisions with leadership from People and Equity)
- 1.3 Continue to consult the <u>Toronto Accessibility Advisory Committee</u> and disability communities to identify, remove and prevent accessibility barriers and to advance equitable outcomes for Torontonians with disabilities. This includes when revising or developing corporate strategies. (all divisions)
- 1.4 Continue to consult Program Advisory Bodies (PABs) on advancing equity, accessibility, and disability inclusion in City programs, services, and spaces. Accessibility advisory bodies may be established for one-time consultation on a specific topic or established for ongoing engagement within a specific service area. (all divisions)
- 1.5 Ensure that equity and accessibility for people with disabilities are prioritized and embedded into appropriate City strategies and infrastructure plans. (all divisions) This includes but is not limited to:
  - The Official Plan (and relevant infrastructure plans/ guidelines that implement the Official Plan),
  - Sidewalks to Skylines: A 10-year Action Plan for Toronto's Economy,
  - The City's Homelessness Services Capital Infrastructure Strategy,
  - The City's Seniors Strategy, and
  - HousingTO Action Plan

- 1.6 In consultation with people with disabilities, address the needs of disability communities in social development projects and strategic plans to ensure people with disabilities have equitable access to service, programs, and resources. (Social Development). This includes but is not limited to:
  - Toronto's Human Service Integration Project,
  - SafeTO: Toronto's Ten-Year Community Safety and Well-Being Plan,
  - Toronto's Youth Equity Strategy,
  - Toronto's Strong Neighbourhoods Strategy,
  - The City's Community Coordination Plan,
  - Toronto's Action Plan to Confront Anti-Black Racism,
  - Toronto's Newcomer Strategy,
  - The City's Community Benefits Framework, and
  - Access Plan for Two-Spirit, Trans & and Non-binary Youth.
- 1.7 Ensure that all Equity Impact Statements created through the City's Equity Lens tool include specific considerations for accessibility and people with disabilities. (People and Equity)
- 1.8 To support participation of people with disabilities in <u>public consultations and</u> <u>engagements</u>, implement mandatory requirements that all public notices posted on the City's website must include information on accessibility and available supports. (City Manager's Office)

#### 2) Budget and Procurement

The IASR requires the City to incorporate accessibility design, criteria and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so. To meet these requirements, the City's Purchasing & Materials Management Division (PMMD) and People and Equity Division have embedded language on accessibility requirements into the City's procurement templates and developed several accessibility resources and guides for City staff.

The City's <u>Purchasing Policies</u> require suppliers to complete AODA and Accessible Customer Service training, and to provide a <u>declaration of compliance with anti-discrimination legislation</u> stating they uphold obligations under provincial and federal legislation, such as the Ontario Human Rights Code, the AODA, the Occupational Health and Safety Act, the Employment Standards Act, and the Charter of Rights and Freedoms.

The DIAP includes an additional six actions to strengthen the city's procurement processes and ensure accessibility criteria remains an integral component of all procurement activities.

The goals of these actions are to:

- Proactively identify the resources needed to remove and prevent accessibility barriers.
- Ensure public funds are not inadvertently used to create or maintain accessibility barriers.

To support these goals, the City of Toronto will:

- 2.1 Ensure considerations for people with disabilities are prioritized and accessibility is embedded in the earliest planning stages of the City's Equity Responsive Budgeting process, this includes how changes to the budget may decrease, maintain and/or increase inequities for people with disabilities. (all divisions with leadership from People and Equity)
- 2.2 Continue to review and update tools and resources to assist City employees in meeting accessibility obligations in procurement as needed. (Purchasing Materials and Management with support from People and Equity)
- 2.3 Develop internal staff resources, including training on accessibility criteria that should be included in common City procurements to ensure taxpayer money is not spent on inaccessible goods and services. (Purchasing Materials and Management with support from People and Equity)
- 2.4 Develop a list of approved suppliers which can be used by any City division performing accessibility user-testing on new or redeveloped services, programs, and/or projects. (Technology Services, Customer Experience)
- 2.5 Conduct an accessibility audit of the City's procurement processes to identify opportunities for improved access for businesses owned by people with disabilities. (Purchasing Materials and Management Division with People and Equity)
- 2.6 Enhance the <u>City's Social Procurement Program</u> to increase opportunities for businesses owned by people with disabilities. This includes investigating the feasibility of collecting disaggregated business ownership data for City suppliers, including businesses owned by people with disabilities, to improve tracking and reporting. (Purchasing Materials and Management Division)

## 3) Training and Skills Development

Under the AODA, the City must provide training on the requirements of the IASR, including <u>training on accessible customer service</u> and on the Ontario Human Rights Code to all of its employees, volunteers and persons who participate in developing City policies or provide services or goods on behalf of the City of Toronto.

To meet this requirement, the City has developed mandatory foundational accessibility and human rights-based courses. In addition, the City has a comprehensive education program that enables staff to build and maintain an equitable and inclusive workplace and to better

serve our city's diverse communities. To continue advancing the skills and knowledge of staff, the DIAP includes nine additional actions.

The goals of these actions are to:

- Reinforce the City's commitments and responsibilities by ensuring City employees have skills and knowledge to provide accessible and disability inclusive services, programs, and facilities.
- Equip City employees to recognize barriers faced by people with disabilities, including ableism.

To support these goals the City of Toronto will:

- 3.1. Expand training programs and initiatives that will cover topics including ableism, disability inclusion, equitable employment and accessible service delivery. (all divisions with leadership from People and Equity)
- 3.2. Require staff to complete the City's Accessibility 101 training course and provincial training courses on the Integrated Standards Regulations (Access Forward Courses) every 5 years or as significant legislative changes are made. (People and Equity)
- 3.3. Review the City's Human Rights and Occupational Health and Safety course offerings and explore expansion of disability accommodation training courses to promote responsibilities under the Human Rights Code, the duty to accommodate (and inquire) as well as obligations under the AODA to all staff. (**People and Equity**).
- 3.4. Develop staff training and resources on conducting accessible and inclusive public consultations and engagements, including best practices for targeted consultation with disability communities. (City Manager's Office)
- 3.5. Develop staff resources and guidelines to embed user research and user experience (UX) design strategies into customer experience initiatives. (Customer Experience with Technology Services)
- 3.6. Ensure that staff developing web applications and posting content to the City's internet (and intranet) have access to appropriate training and learning resources on digital accessibility. (Technology Services, Strategic Public and Employee Communications)
- 3.7. Develop staff training on the use of accessibility features in the City's web conferencing tools including best practices on how to hold hybrid meetings and events that are accessible and inclusive. (**Technology Services**)
- 3.8. Enhance disability inclusion and awareness by delivering accessibility-focused trainings to employees in City-run shelters and support services. Training will expand upon AODA standards and include topics such as ableism, unconscious biases,

- visible and invisible disabilities, and inclusive practices that remove barriers and improve access for all individuals. (Toronto Shelter and Support Services)
- 3.9. Develop training requirements and resources for By-law Enforcement and Transportation Standards Officers on the accessibility of applicable City infrastructure such as but not limited to the <a href="City's CafeTO program">City's CafeTO program</a> and Construction Zones. (Transportation Services)

## 4) Equitable Employment

The City is required under the IASR to support the recruitment, advancement, and accommodation of its employees with disabilities. The City has developed several <a href="mailto:employment policies">employment policies</a> that work together to support equity in our employment practices including:

- Corporate Accessibility Policy,
- Accommodation Policy,
- Employment Equity Policy,
- Human Rights Anti-Harassment/Discrimination Policy, and
- Psychological Health and Safety Policy

The City of Toronto is committed to fostering a diverse and inclusive workforce to best serve Toronto's communities. Job applicants can request accommodation related to the protected grounds of the Human Rights Code at any stage of the City's hiring process, i.e., application, assessment, and placement.

In addition to the City's policy framework, the DIAP includes twelve actions to further support equitable employment processes for people with disabilities.

The goals of these actions are to:

- Ensure the City has equitable employment and accommodation policies and procedures that seek to remove systemic barriers experienced by people with disabilities.
- Ensure City employees are aware of the policies that promote equitable employment, engagement and advancement opportunities within the organization.

To support these goals the City of Toronto will:

4.1. Review and update job descriptions and job ads as appropriate to include relevant qualifications and skill sets on applicable legislated accessibility standards. (all divisions with leadership from People and Equity)

- 4.2. Review the <u>City's Accommodation Policy, procedure/form and guidelines</u> to improve equitable outcomes, including timeliness of accommodations, for candidates and employees with disabilities, and where needed, develop resources to support people leaders and employees. (**People and Equity**)
- 4.3. Create resources for staff on how to request ergonomic and assistive technology. (People and Equity)
- 4.4. Identify and remove barriers which impact the timeliness of completing technology-related employee accommodations. This includes reviewing current rosters and contracts to ensure ergonomic equipment and assistive technology can be procured in a timely manner. (Technology Services with Purchasing Materials and Management)
- 4.5. Review corporate recruitment processes to identify and remove any unintended accessibility barriers in job descriptions and essential job duties to promote equitable employment practices. (**People and Equity**)
- 4.6. Review, update, and regularly promote policies and procedures that prevent and remove barriers in employment and development opportunities for candidates and staff with disabilities. (**People and Equity**)

  This includes but is not limited to the City's:
  - Human Rights and Anti-Harassment and Discrimination Policy
    - Corporate Accessibility Policy
    - Employment Equity Policy
- 4.7. Review and update disability-related questions as needed in the City's Employee Engagement survey to continuously examine and improve inclusion and engagement of employees with disabilities. (**People and Equity**)
- 4.8. Continue to support the Employee Disability Network to promote professional development opportunities for employees with disabilities. (**People and Equity**)
- 4.9. Continue to produce annual reports summarizing disability-related inquiries, complaints, and grievances through the Human Rights Office. (**People and Equity**)
- 4.10. Review and update the City's Psychological Health and Safety Policy and develop an ongoing mental health strategy which includes removing stigma in the workplace and various training and support programs for City staff, including Mental Health First Aid training. (People and Equity)

- 4.11. Advance workforce equity strategies to increase employment and internship opportunities for people with disabilities in the Toronto Public Service. (People and Equity)
- 4.12. Develop a talent management pilot program aimed at hiring and supporting successful candidates with autism. (Toronto Employment and Social Services, with support from People and Equity)

## 5) Equitable Services

The City of Toronto is committed to customer service excellence. The IASR requires the City to provide accessible services to people with disabilities and to have policies and procedures in place to support accessible customer service. The <a href="City's Corporate Accessibility Policy">City's Corporate Accessibility Policy</a> lays the foundation for accessible customer service at the City. In addition, all divisions maintain specific customer service standards and may have unique service guidelines. For example, the Parks and Recreation Division maintains an additional <a href="Accessible Customer Service Guide">Accessible Customer Service Guide</a>.

The public may seek information on City services or provide feedback to the City directly by calling 311 at any time. For accessibility-related feedback, residents can also complete the City's online Accessibility Complaints Form. Accessible formats and communication supports are available upon request.

The DIAP includes an additional fifteen actions to support equitable and accessible customer service at the City.

The goals of these actions are to:

- Ensure people with disabilities receive City programs and services of the same quality and within the same timeline as others and benefit equally from customer service initiatives.
- Ensure City employees have access to tools, resources, policies and procedures to support accessible customer service.

To support these goals the City of Toronto will:

- 5.1. Ensure all divisional customer service standards and complaints processes on www.toronto.ca include an active offer for accessible formats, communication supports and/or disability-related accommodations including contact information on how to request. (all divisions)
- 5.2. Prioritize accessibility and disability inclusion at all City-run public consultations, festivals and events to ensure equitable participation for people with disabilities.

- Consultations, festivals, and events will proactively consider and plan for accessibility supports and individualized accommodations. (all applicable divisions)
- 5.3. Consistently collect socio-demographic data in line with the <u>City's Data for Equity Guidelines</u> to better understand how people with disabilities use City programs, services, and spaces and what barriers are encountered. Where possible, incorporate intersectional analysis to understand diverse experiences. (all divisions)
- 5.4. Continue to review and update the City's Equity Lens Tool and related resources to reflect current data and known systemic barriers in City programs and services. (People and Equity)
- 5.5. Using data from the Canadian Survey of Disability, prepare a city-wide demographic profile of people with disabilities that can be posted to the City's website. (City Planning, Social Development)
- 5.6. Consult service users with disabilities to identify accessibility related barriers in divisional run front-line services. Review will consider various types of barriers (social and attitudinal, systemic, physical, or environmental, information, communication and technology) to determine areas of improvement, priority recommendations and suggested timelines for implementation. (Seniors Services and Long-Term Care, Toronto Employment and Social Services, Toronto Public Health, Children's Services and Toronto Shelter and Support Services)
- 5.7. Using human rights-based approach to the Poverty Reduction Strategy, engage people with disabilities on policy and program initiatives and address the disproportionate impacts of poverty including unemployment, housing precarity, and service access barriers experienced by disability communities. (Social Development)
- 5.8. Identify and address food access barriers among people with disabilities using a rights-based approach to service improvement and program development. (Social Development, Toronto Employment and Social Services).
- 5.9. Review eligibility criteria for specialized shelter programs that integrate health service to ensure equitable access for people with disabilities in City-run shelters and support services. (Toronto Shelter and Support Services)
- 5.10. Continue work on the Homelessness Health Services Framework to better support people with mental health and substance use related disabilities who are experiencing homelessness. (Toronto Shelter and Support Services)

- 5.11. Expand the availability of communication supports and alternative formats available to clients using city-run shelters and support services. Communication supports and alternative formats include but are not limited to braille devices, text to text devices, screen reader software, 711 Relay Service, and communication boards or other assistive devices. (Toronto Shelter and Support Services)
- 5.12. Conduct an inventory of available assistive devices at in-person service locations (City Hall and Scarborough Civic Centre) and develop a plan to standardize and improve the availability of technology such as assistive listening devices, microphones, hearing loops, text to text devices and video relay machines where appropriate. (Customer Experience Division)
- 5.13. Embed user research and accessibility check points (gating) in Customer Experience and Technology related project life cycles and supporting guidelines to ensure that equity and accessibility are included from the earliest stages of the project/service design. (Customer Experience, Technology Services)
- 5.14. Review the <u>City's Municipal Elections Accessibility Plan</u> in consultation with the Elections Accessibility Outreach Network to ensure the City's election processes is accessible to electors and candidates with disabilities. (**City Clerk's Office**)
- 5.15. Review current gaps and identify opportunities for improving and/or expanding the <a href="City's Adapted and Inclusive recreation">City's Adapted and Inclusive recreation</a> programming, including outdoor recreation, to ensure people with disabilities have equitable access to recreation programs that promote health and wellness. (Parks and Recreation)

## 6) Information, Communication, and Technology

Under the IASR, the City is required to communicate and provide information in ways that are accessible to people with disabilities. This includes ensuring the City's website, applications, and web content comply with specific <a href="Web Content Accessibility Guidelines">Web Content Accessibility Guidelines</a> (WCAG).

The City's Technology Services Division continues to work with partners across the organization to ensure the City's website, web content and applications have met or exceeded AODA standards. The division also provides guidelines and training resources to web developers and content creators to ensure they adhere to the <a href="City's Digital Accessibility Standard">City's Digital Accessibility Standard</a>.

To build on this work, the City's DIAP includes eleven actions to improve accessibility of its information, communications, and technology.

The goal of these actions is to:

- Ensure City employees, residents, and visitors with disabilities have access to the information they need and can benefit from City services and programs to the same degree and within the same timeframe as others.
- Ensure information on the accessibility of programs, services, facilities, public spaces, and events is readily available.

To support these goals the City of Toronto will:

- 6.1. Review the accessibility of the City's 311 Customer Experience channels to ensure that people with disabilities can submit service requests, compliments and complaints and communicate with 311 through various channels. This includes researching new ASL technology options. (Customer Experience)
- 6.2. Review accessibility of 311 on-line submission processes to ensure the processes are equitable, accessible, usable/user friendly and address relevant types of accessibility-related feedback, including feedback on City-provided information, communications, and technology. (Customer Experience)
- 6.3. Review and regularly update public information on the availability of accessible elements and features in City parks and recreation facilities including outdoor pools, outdoor washrooms, trails, beaches, recreation centres, and the Toronto Island Ferry. When accessible elements are out of service, updates will be posted on the City's toronto.ca website. (Parks and Recreation)
- 6.4. Develop mandatory requirements for information posted to the <u>City's Festivals & Events Calendar</u> to include detailed information on the availability of accessible features, and supports for people with disabilities. (**Economic Development and Culture, City Clerk's Office**)
- 6.5. Review and update all City communication policies and guidelines to ensure they contain accessibility requirements and best practices for developing information and communications that are accessible to people with disabilities, including during media briefings and emergency situations. (Strategic Public and Employee Communications)
- 6.6. Upgrade the City's Intranet Platform and develop an ongoing quality assurance process to ensure content posted for employees meets the City's Digital Accessibility Standard. (**Technology Services**)
- 6.7. Continue to ensure content uploaded to both the City's intranet (InsideTO) and internet (toronto.ca) is accessible to people with disabilities and adheres to the Digital Accessibility Standard. (Strategic Public and Employee Communications, Technology Services)

- 6.8. Create a corporate process which prioritizes access to assistive devices, software, alternative peripheral devices and technical support for staff who use assistive technologies at the City. (Technology Services)
- 6.9. Regularly review and update the City's Digital Accessibility Standard to ensure that new and emerging best practices are considered. (**Technology Services**)
- 6.10. Continue to embed accessibility and equity into the <u>City's Digital Infrastructure</u> <u>Strategic Framework</u> and associated standards, guidelines, policies and processes, including project governance and user testing, to ensure that all technology solutions and digital services are accessible, intuitive and easy to use by everyone. (Technology Services)
- 6.11. Maintain a record of all web accessibility testing include what webpages, documents or applications have been tested, subsequent results, exemptions and/or remediation activities and expected remediation timelines, if applicable. (Technology Services)

## 7) Facilities and Public Spaces

The City is required under the IASR to ensure that newly constructed or redeveloped public spaces are accessible. The City strives to proactively increase the accessibility of its facilities, public spaces and workspaces recognizing that built environment barriers are a form of discrimination.

Accessibility design guidelines such as the <u>Toronto Accessibility Design Guidelines (TADG)</u> and the <u>Complete Streets Guidelines</u> are mandatory for any new or significantly renovated City facility or space. The TADG is a key component of the City's accessibility framework and is aligned with the <u>City's Official Plan</u>, which prioritizes removing barriers, "through proactive measures that promote accessibility, equity and inclusion."

The City's DIAP includes an additional fourteen actions to help support access in and around City facilities and public spaces.

The goal of these actions is to:

 Ensure City infrastructure including facilities, streets, sidewalks, parks and recreation areas are accessible, easy to navigate and are safe for employees, residents and visitors with disabilities.

To support these goals the City of Toronto will:

7.1. Continue to prioritize accessibility upgrades and retrofits of existing facilities and public spaces under the City's State of Good Repair Capital Program. Retrofits and upgrades must comply with City-developed guidelines, including but not limited to the <a href="Toronto Accessibility Design Guidelines">Toronto Accessibility Design Guidelines</a>, Complete Streets Guidelines, Shelter <a href="Design Guidelines">Design Guidelines</a> and Affordable Housing Guidelines. (all applicable divisions)

- 7.2. Review and update maintenance and inspection schedules to ensure working order of accessible elements and consistent signage and communications are used during service disruptions at City-owned facilities and spaces. This includes ensuring clear paths of travel are maintained in City run spaces. (all applicable divisions).
- 7.3. Ensure that accessible design and disability inclusion are incorporated into construction and renovation plans for City council and committee rooms at Toronto City Hall. (City Clerk's Office, Corporate Real Estate Management)
- 7.4. Continue the work of the City's Accessibility Housing Working Group and implement on-going recommendations to increase the accessibility and adaptability of affordable homes across the City. (Housing Secretariat)
- 7.5. Identify accessibility features within the City's existing community housing stock for the purpose of improving the unit advertising and matching process with households on the centralized waitlist that are eligible for a modified unit. (Housing Secretariat)
- 7.6. Ensure people with disabilities and appropriate community organizations are represented on all housing focused Council Advisory Bodies (CABs) and Program Advisory Bodies (PABs) at the City, including the Housing Rights Advisory Committee. (Housing Secretariat)
- 7.7. Address the growing needs of low- and moderate-income Torontonians with disabilities by continuing to invest federal, provincial, and city funding, as well as city incentives, into creating new accessible, affordable homes, and by delivering housing repairs and accessibility modifications to ensure individuals have safe, accessible, and affordable housing options that are right for them. (Housing Secretariat)
- 7.8. Prioritize accessibility-related projects through the implementation of the Parks and Recreation Facilities Plan and other facility projects (such as Park Upgrades, State of Good Repair) to ensure that the City continues to address barriers experienced in City-run parks and recreation facilities. (Parks and Recreation)
- 7.9. Prioritize accessibility solutions for the City's High Park Movement Strategy, to ensure people with disabilities have equitable access to High Park, including during traffic closures. (Parks and Recreation)
- 7.10. Continue to research and incorporate methods that will improve accessibility of city streets and sidewalks in consultation with people with disabilities. (**Transportation Services**)

- 7.11. Develop an inspection and enforcement strategy to ensure curb lane patios (CafeTO) are accessible to people with disabilities. This includes a campaign aimed at CafeTO operators to build awareness of mandatory and recommended accessibility features of the CafeTO initiative. (Transportation Services)
- 7.12. Maintain the <u>Toronto Accessibility Design Guidelines</u> as the mandatory design standards for all City renovation and construction projects. (Corporate Real Estate Management)
- 7.13. During reviews of evacuation procedures of City-run facilities, ensure accessibility and considerations for people with disabilities are included. (Corporate Real Estate Management)
- 7.14. Require that all renovated and/or new City workspaces are accessible to people with disabilities through the City's ModernTO Program. (Corporate Real Estate Management)

## 8) Transportation

The IASR outlines requirements to prevent and remove barriers to public transportation for people with disabilities. The City of Toronto's transportation responsibilities and DIAP actions apply to the Toronto Island Ferry and licensing of vehicles-for-hire (taxicabs and private transportation companies). The Toronto Transit Commission (TTC) manages conventional and specialized transportation services in Toronto and maintain its own policies and plans.<sup>2</sup>

As part of its commitment to accessibility, the City has developed ten actions related to pedestrian mobility and usability that go beyond what is required under the IASR.

The goals of these actions are to:

- Ensure sidewalks and roadways are accessible and facilitate easy and safe mobility throughout Toronto for all residents and visitors.
- Increase equitable access to a range of accessible transportation services in Toronto to meet the needs of all residents and visitors.
- Increase awareness and consideration of accessibility in the City's transportationrelated strategies, planning and policies.

To support these goals the City of Toronto will:

8.1. Increase awareness of the Vehicle-for-Hire Accessibility Fund Program available to taxis and vehicle for hire providers to offset the higher cost of providing wheelchair accessible service. (Municipal Licensing and Standards)

- 8.2. Continue to investigate ways to reduce current wait times for accessible on-demand taxis/vehicles for hire to ensure equitable transportation options for people with disabilities across the Greater Toronto Area. (Municipal Licensing and Standards)
- 8.3. Retain, relocate or increase the number of accessible parking and accessible loading zones when street design changes are considered through community and Wheel Trans consultation. (Transportation Services)
- 8.4. Continue to fulfill requests for accessible parking spaces and accessible loading zones. (Transportation Services)
- 8.5. Develop a public education campaign on Accessible Parking in the City including but not limited to penalties for misuse. **(Transportation Services)**
- 8.6. Investigate and implement safety and accessibility solutions in construction projects that impact the public right of way, pedestrian traffic and wayfinding for people with disabilities. (**Transportation Services**)
- 8.7. Undertake an analysis of the operational and financial feasibility of expanding windrow clearing and related winter services to enhance support to seniors and people with disabilities. (**Transportation Services**)
- 8.8. Continue to consult the Toronto Accessibility Advisory Committee on potential changes to relevant and applicable bylaws regarding the use of micro-mobility devices and e-scooters on City streets and sidewalks. (Transportation Services)
- 8.9. Continue to install and fulfill requests for <u>Accessible Pedestrian Signals</u> and <u>Tactile Walking Surface Indicators</u> at road crossings as part of state of good repair road rehabilitation projects. (**Transportation Services**)
- 8.10. Continue to implement accessibility design and installation standards for electric vehicle (EV) charging stations to ensure that people with disabilities have equitable access to charging stations at City run facilities. (Environment, Climate and Forestry)

## Conclusion

The City of Toronto remains committed to identifying, removing and preventing barriers for people with disabilities who live, work, or visit Toronto. As we move forward in our journey, the City will continue to meet its obligations under the *Accessibility for Ontarians with Disabilities Act* (AODA) and will strive towards advancing accessibility and disability inclusion in our programs,

services, facilities and public spaces. The City is equally committed to being an equitable and inclusive employer by continuing to examine our workplace policies, procedures, employee supports and employment opportunities.

The 2025-2029 Disability Inclusion Action Plan is a shared responsibility across all City divisions and service areas. The DIAP aims to create a culture shift that embraces disability inclusion to ensure that people with disabilities are included and thrive in our city, government and on matters that impact them.

The Accessibility for Ontarians with Disabilities Act is the foundation for our accessibility planning, and the City has made many advancements since its enactment in 2005. However, we recognize that more actions must be implemented to truly meet the goals of the AODA. As the largest municipal government in Ontario and Canada, the City will strive to be a recognized leader in accessibility and disability inclusion.

The DIAP builds directly on the achievements of the previous 2020-2024 Multi-year Accessibility Plan. The People and Equity Division will monitor progress made on implementing the new actions in the 2025-2029 Disability Inclusion Action Plan and post yearly status reports on the City's website.

#### Feedback Process

Feedback on this Disability Inclusion Action Plan is welcome. Feedback may include comments and/or suggestions about the DIAP or the related <u>Corporate Accessibility Policy.</u>

If you have comments or questions about the 2025-2029 Disability Inclusion Action Plan, you may submit them to the City's Accessibility Unit through the following methods:

- 1. Online Using the online DIAP feedback form
- 2. By email accessibility@toronto.ca
- 3. By phone -416-338-2632

All communications will be treated confidential, and your personal information will not be shared to anyone without your consent. The nature of your feedback will be shared with relevant staff excluding personal information unless consent is provided.

If you would like to submit anonymous feedback, please use the online DIAP feedback form.

## Feedback on a Specific Program, Service, Webpage or City-run Facility/Space

<u>311 Toronto</u> is the City's main customer service channel that supports residents, businesses and visitors. 311 Toronto provides access to City services, programs and information 24 hours a day, seven days a week and in over 200 different languages.

Accessibility related feedback on a specific City service or program can be submitted to the City via 311's <u>feedback processes</u> or directly to the relevant division through their <u>divisional complaints process</u>. Feedback can be submitted in a variety of accessible methods and may include the provision of accessible formats and communication supports as required under the Corporate Accessibility Policy.

Concerns or feedback related to the accessibility or usability of the City's website can be reported through the feedback section available at the bottom of all City webpages.

# **Appendix A: Findings from Public and Employee Consultations**

The DIAP was informed by consultations with people with disabilities, support persons, community organizations, City staff as well as the <u>Toronto Accessibility Advisory Committee</u> (TAAC). City divisions were consulted on recommended actions, scope of each action, implementation timelines, and accountability of program areas. In addition, a jurisdictional scan was done which considered reviews of the AODA, current IASR standards and other government accessibility plans.

A public consultation survey sought input on disability-related barriers experienced when accessing City services, programs, facilities, public spaces, information and communications and employment opportunities. Respondents were also asked about individual accommodations as well as preferred communication and service channels when interacting with the City.

Alternate survey formats including paper-based surveys, phone-in interviews and inperson sessions were also provided. Targeted in-person consultations were held with clients staying in City-run shelters and additional discussions were held with the City's Parks and Recreation Disability Steering Committee and the City of Toronto Seniors' Forum.

#### **Accessibility-related Priorities Identified through Public Consultations**

When asked what top areas the City should prioritize with respect to improving accessibility, respondents most frequently identified:

- Accessible and affordable housing,
- · Accessibility of streets and sidewalks,
- Information on services and programs for people with disabilities and
- More adaptive and inclusive recreation facilities and programs.

Secondary priorities included:

- On-street accessible parking,
- · Accessibility of City-run shelters and
- Accessible public consultations.

#### Barriers Encountered in City Programs, Services, and Spaces

Most respondents indicated that physical or environmental barriers were most likely to limit access to City services, program and spaces. However, a high proportion also indicated that social or attitudinal, systemic, and information, communication and technology-related (ICT) barriers were also frequently encountered and have a high impact to access. Barriers were most frequently reported in the public realm (streets, sidewalks, cross walks), outdoor recreation areas (parks, trails, beaches), City recreation programs and City-run shelters.

Figure 4: Types of Barriers Encountered when accessing City Programs, Services and Spaces by Respondent Group

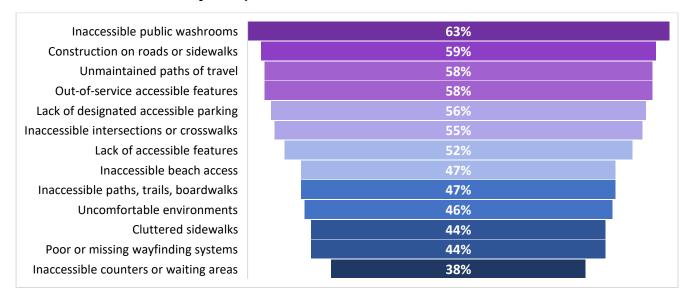
Type of Barrier Encountered	People with Disabilities	Support Persons	Community Organizations
Physical or environmental	66%	62%	70%
Social or attitudinal	43%	41%	59%
Systemic	41%	38%	56%
Information, communication, or technology	34%	36%	54%

#### **Physical and Environmental Barriers**

The physical barriers identified to have major impact on people with disabilities when accessing City facilities and public spaces were inaccessible public washrooms,

construction on roads or sidewalks, unmaintained paths of travel, out-of-service accessible features and lack of designated accessible parking.

Figure 5: Physical and environmental barriers which were reported by people with disabilities to have a major impact.



#### **Social and Attitudinal Barriers**

The most impactful social or attitudinal barriers identified by people with disabilities were discrimination based on disability and lack of suitable accommodation when requested. However, lack of understanding and assumptions regarding disability was the most frequently experienced social or attitudinal barriers reported by people with disabilities.

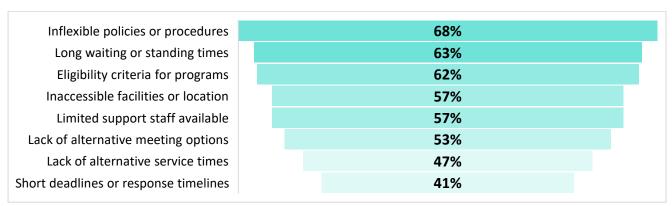
Figure 6: Social and attitudinal barriers which were reported by people with disabilities to have a major impact.

Discrimination based on disability	61%
Lack of suitable accommodation	60%
Being overlooked or ignored by staff	<b>52</b> %
Lack of understanding	50%
Assumptions by staff	50%

#### Systemic Barriers

The highest impact systemic barriers reported by people with disabilities during consultations were inflexible policies or procedures, long waiting or standing times, eligibility criteria for programs and inaccessible facilities or location.

Figure 7: Systemic barriers which were reported by people with disabilities to have a major impact.



#### Information, Communication and Technology related Barriers

With respect to information, communication and technology-related barriers, those that were reported to have high impact were online services, City forms, accessibility

information on City facilities and public spaces and hearing or communicating with City staff.

Figure 8: Information, communication, or technology-related barriers which were reported by people with disabilities to have a major impact.

Online comices	420/
Online services	42%
City forms	42%
Information on facility/space	41%
Hearing/communicating with staff	39%
Participating in civic meetings	38%
Self-service terminals	33%
Information on the City's website	18%

#### **Accommodations and Preferred Communication Channels**

Virtual appointments or meetings were the most requested types of accommodation made by people with disabilities, followed by alternative or preferred communication methods. Other common requests from people with disabilities included alternative meeting location, alternative method of communication and/or access to a quiet room or private space.

Email, telephone and the City's website were the most preferred ways to access services/programs or communicate with City staff.

Figure 9: Types of accommodations requested by people with disabilities when accessing city services or programs.

Requested Accommodation	Accommodations requested by People with Disabilities (by percentage of requests made)
Virtual appointment or meeting	32%
Alternative meeting or service location	22%
Alternative or preferred communication method	21%
Access to a quiet room or private meeting space	20%
Navigation support	19%
Alternative formats of documents	18%
Note-taking/scribing services	8%
Real-time captioning	8%
Sign language interpretation (ASL or LSQ)	3%

## **Results from Employee Consultations**

In addition to public consultations, the City conducted an all-staff survey to better understand what barriers employees with disabilities have experienced in their workplace, career and when requesting disability-related accommodations. The survey also asked respondents about staff resources and training opportunities.

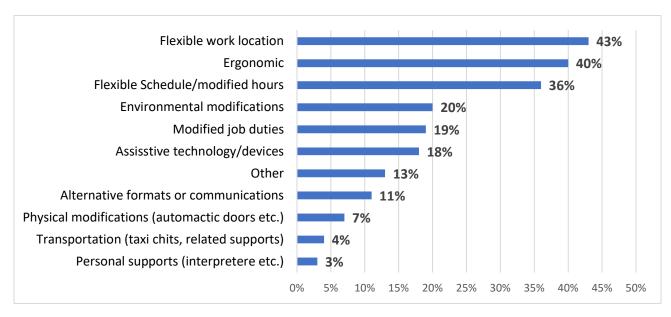
#### **Disclosure and Employee Accommodations**

Most employees with disabilities at the City, reported they have disclosed their disability and felt supported by their people leader and/or colleagues when disclosing. However, there were employees that have chosen not to disclose even though they need or could benefit from accommodations. The top reasons for not requesting an accommodation included possible impact on career progression, privacy concerns, not wanting to burden others and fear of stigma.

The majority of employees who have requested accommodations reported their accommodation request was accepted in good faith and most felt they had received

suitable accommodations to perform their job. However, some employees did report barriers during the accommodation process. The most frequently reported barriers included unfamiliarity with employees' rights and the disability accommodation process, lack of consultation with the employee and overall timeliness of accommodations. The top suggestions for improving accessibility in City workplaces included increased consultation with employees with disabilities. There was also a strong call for the City to review its accommodation policy, procedures, and guidelines and to promote more timely accommodations.

Figure 10: Prevalence of disability-related accommodations currently in place within the Toronto Public Service.



#### **Common Disability-related Barriers in the Workplace**

Employees with disabilities reported that barriers are most frequently encountered during disability accommodations, professional development opportunities, job promotions as well as in interview and assessment stages. Although all barriers had a high impact on how included and respected employees feel, social, attitudinal and/or systemic barriers had the highest impact.

Overall employees with disabilities recommended that the City focus on developing more resources and training opportunities for both people leaders and employees on disability-related accommodations in the workplace as well as training and resources on ableism and removing barriers for employees with disabilities.

# **Appendix B: Types of Disability-related Barriers and Resulting Inequities**

People with disabilities continue to be negatively impacted by physical, environmental, systemic and social barriers, including ableism. As a result of these barriers, people with disabilities often experience marginalization, exclusion and social inequities, including but not limited to lower employment rates, income levels, access to accessible housing, education, employment, food and necessary supports.

It is also important to acknowledge that disability is experienced and understood in diverse ways influenced by various intersecting aspects of identity. For example, racism and ableism coexist and can magnify barriers experienced in our society.

Disability-related barriers include:

**Attitudinal (Ableism) Barriers -** Negative attitudes or assumptions such as assuming an employee with a disability cannot be independent or thinking that accommodations are too difficult to implement. Negative assumptions, bias and/or ableism often lead to further barriers in our policies, programs, environments and information, communication and technology.

**Systemic Barriers -** Policies, procedures, or program criteria that prevent full participation and inclusion. For example, only accepting applications via one channel or not allowing flexibility in an application process to allow for longer response times, if needed.

**Physical or Environmental Barriers -** Structural obstacles in the environment that prevent free and independent navigation such as a lack of resting places for those who are unable to walk long distance, signage that is too small to see from a distance, ramps that are not maintained in the winter.

**Information, Communication and Technology Barriers -** Experienced by those who have disabilities that affect speaking, reading, writing, understanding, vision and/or hearing as well as those who may use different modes of communication. Examples of barriers include small print, inaccessible websites, videos without captions and use of complex language.

Experiencing one or more of the barriers above can lead to significant disability inequities including but not limited to:

#### Lower income and employment opportunities.

Despite most people with disabilities having at least a high school degree or higher, people with disabilities are more likely to have low income, be underemployed and/or experience poverty in our society. This has been attributed to several factors, including unmet workplace accommodation needs and workplace discrimination. Among people with disabilities, youth, women, single parent households and those that live alone are the most likely to be living in poverty.

Recent data from the 2022 Canadian Survey on Disability showed that within the City of Toronto the employment rate for people with disabilities, aged 15 years and over was 41% compared to 59% for those without a disability. Further to this, people with disabilities were more likely to earn less income compared to those without disabilities,

<sup>&</sup>lt;sup>13</sup> Statistics Canada. 2023. Labour market characteristics of person with and without disabilities in 2022: Results from the Labour Force Survey. <a href="https://www150.statcan.gc.ca/n1/pub/71-222-x/71-222-x2024002-eng.htm">https://www150.statcan.gc.ca/n1/pub/71-222-x/71-222-x2024002-eng.htm</a>

with most Torontonians with a disability (60%) earning less than \$40,000 per year. Broken down further, 32% earned between \$20,000-\$39,999 per year while 28% earned under \$20,000. Based on the 2023 Market Basket Measure threshold for a single adult in Toronto (\$28,766), someone with a disability needs to earn a minimum income of \$37,395 to meet basic living costs (food, shelter) however, additional costs are often required for people to have positive health outcomes. Research by the Wellesley Institute demonstrates the resources required to thrive with a disability in the City of Toronto can cost up to 39% more than thriving without a disability.

#### Limited safe, affordable and accessible housing options.

People with disabilities experience higher rates of being in core housing need, living in unaffordable housing, and living in homes in need of major repairs compared to individuals without a disability. <sup>15</sup>, <sup>16</sup> Persons with disabilities are also more likely to live in rented dwellings than the total population (33% compared to 26%), and are more likely to live in subsidized rented dwellings than the total population (5% compared to 3%). <sup>15</sup> When factoring in income, in 2017, 25% of people with disabilities lived in households that spent more than 30% of their total household income on shelter, this was 5% higher than the total population, despite people with disabilities having similar or lower shelter costs. <sup>15</sup> In Toronto, People with disabilities, are also more likely to be unhoused or use shelters and/or shelter services. In the City's 2021 Street Needs Assessment, 76% of the respondents reported having one or more health issues.

Women are more likely to experience higher rates of poverty and violence in Canada, both of which can impact the ability to find and maintain safe, accessible and affordable housing. More specifically, women with disabilities face 45% of all reported incidents of violent crime against women in Canada and are about 2 times more likely than other women to be homeless at some point in their lives. Risk to experiencing violence is greater for women with disabilities who are younger, racialized, Indigenous, identify as 2SLGBTQ or are an immigrant, migrant worker, or non-status migrant. In these cases, violence or abuse may be from a partner, support person, family member, social workers, health care service providers etc. Housing insecurity also increases women's vulnerability to experiencing violence because women find themselves in isolated settings, without support. 17

## Decreased access to supports, food, medication, and other critical needs, such as assistive devices or home modifications.

With decreased employment rates and higher rates of poverty, people with disabilities can experience barriers in obtaining necessary supports, services, medication, and assistive devices, all of which have an impact on overall health. In 2022, 56% of Canadians with disabilities, reported at least one unmet need when it came to either aids, devices, medication, or healthcare services. Furthermore, 73% of those with unmet needs cited cost as the reason for those unmet needs. Preaking this down further, 29% of Canadians with disabilities had unmet needs due to cost for healthcare

<sup>&</sup>lt;sup>15</sup> Statistics Canada. 2022. Housing Experiences in Canada Persons with Disabilities. https://www150.statcan.gc.ca/n1/pub/46-28-0001/2021001/article/00011-eng.htm

<sup>&</sup>lt;sup>16</sup> Canadian Human Rights Commission. 2024. *Monitoring the right to housing for people disabilities: Monitoring Framework.* <a href="https://www.chrc-ccdp.gc.ca/resources/publications/monitoring-the-right-housing-people-disabilities">https://www.chrc-ccdp.gc.ca/resources/publications/monitoring-the-right-housing-people-disabilities</a>

<sup>&</sup>lt;sup>17</sup> Lalonde, D., & Baker, L. (2019). Women with Disabilities and D/deaf Women, Housing, and Violence. *Learning Network Issue* 27. London, Ontario: Centre for Research & Education on Violence Against Women & Children. ISBN # 978-1-988412-28-3. <a href="https://www.gbvlearningnetwork.ca/ourwork/issuebased">https://www.gbvlearningnetwork.ca/ourwork/issuebased</a> newsletters/issue-27/index.html

<sup>&</sup>lt;sup>18</sup> Statistics Canada. 2024. Accessibility in Canada: Results from the 2022 Canadian Survey on Disability. <a href="https://www150.statcan.gc.ca/n1/daily-quotidien/240528/dq240528b-eng.htm">https://www150.statcan.gc.ca/n1/daily-quotidien/240528/dq240528b-eng.htm</a>

services, 16% had unmet needs due to cost for aids and devices, and 13% indicated unmet needs due to cost for prescription medication. 17

Barriers are also experienced in obtaining home modifications and daily aids. In 2022, of the 55.8% of Canadians with disabilities who had physical disabilities, 44.9% required at least one type of aid, assistive device, or accessibility feature within their home. Over 1 in 10 (13.0%) of those with physical disabilities indicated there were aids and assistive devices that they needed but did not have.

Income-related food insecurity is another important social determinant of health, and people with disabilities are at a higher risk of experiencing household food insecurity than those without disabilities. <sup>19</sup> Specifically, within the Toronto region, 51% of food bank users report having a disability. <sup>20</sup> When people cannot afford food and other costs of living, they may put off necessary medical expenses, which can lead to negative health outcomes, inhibit their ability to work, and ultimately make it more difficult to escape the cycle of poverty.

## Decreased access to Information, communications, and technology including the internet.

In 2021,12% of Canadians with a disability said they could not connect to the internet at home (vs.5% of people without a disability) and 16% said they did not use the internet (vs. 8% overall).<sup>21</sup> People with disabilities were also 2.5 times more likely to say they do not use a technology device and 2 times more likely to say they do not have a smartphone compared to those without a disability.<sup>22</sup> Overall, 18% of Canadians with disabilities who do not use the internet reported it was due to cost, 16% said it was due to not having a device available in their home and 18% said it is due to at least one information, communication or technological barrier.<sup>23</sup>

#### **Impacts of COVID-19**

People with disabilities were disproportionately impacted by the COVID-19 pandemic.<sup>24</sup>, <sup>25</sup> These negative impacts continue to be experienced today, including heightened susceptibility to contracting COVID-19, higher risk for severe infection and/or longer

<sup>&</sup>lt;sup>19</sup> Statistics Canada. 2024. Household food insecurity among person with disabilities in Canada: Findings from the 2021 Canadian Income Survey. <a href="https://www150.statcan.gc.ca/n1/pub/82-003-x/2024008/article/00002-eng.htm">https://www150.statcan.gc.ca/n1/pub/82-003-x/2024008/article/00002-eng.htm</a>

<sup>&</sup>lt;sup>20</sup> Daily Bread Food Bank (2021). 2021 Who's Hungry: From Crisis to Resilience: A City's Call to Action. DB-WhosHungryReport-2021-FINAL.pdf

<sup>&</sup>lt;sup>21</sup> Statistics Canada. 2021. Canadian Internet Use Survey, 2020. <a href="https://www150.statcan.gc.ca/n1/daily-quotidien/210622/dq210622b-eng.htm">https://www150.statcan.gc.ca/n1/daily-quotidien/210622/dq210622b-eng.htm</a>

<sup>&</sup>lt;sup>22</sup> Statistics Canada. Table 13-10-0813-01 Reasons for not using the Internet for persons with disabilities, aged 15 years and over, by sex. <a href="https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1310081301">https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1310081301</a>

<sup>&</sup>lt;sup>23</sup> Statistics Canada. 2021. The accessibility experiences of Canadians with disabilities, 2017. https://www150.statcan.gc.ca/n1/daily-quotidien/211027/dq211027d-eng.htm

<sup>&</sup>lt;sup>24</sup> Ontario Human Rights Commission. 2020. Policy Statement on a human rights-based approach to managing the COVID-19 pandemic. <a href="https://www3.ohrc.on.ca/en/policy-statement-human-rights-based-approach-managing-covid-19-pandemic">https://www3.ohrc.on.ca/en/policy-statement-human-rights-based-approach-managing-covid-19-pandemic</a>

<sup>&</sup>lt;sup>25</sup> Government of Canada. 2022. Canada's Disability Inclusion Action Plan, 2022. https://www.canada.ca/en/employment-social-development/programs/disability-inclusion-action-plan/action-plan-2022.html

isolation times. <sup>26,27,28</sup> In addition, the lack and/or loss of personal support, safe transportation options, or a decrease in income resulting from the pandemic can further impact whether someone can access medical care, associated therapies, and/or afford the basics of daily living, including personal support, medications, assistive technology and/or food. <sup>29,30</sup>

Two in five Canadians with disabilities (45%) reported difficulties in meeting their financial obligations due to the pandemic.<sup>29</sup> In a separate study by Statistics Canada, almost half (48%) of Canadians with disabilities reported their general health has worsened compared to the start of the pandemic. Over half (57%) reported their mental health was worse than prior to the pandemic. While 77% reported they needed but did not receive one or more therapies or service for their condition during the pandemic. Among those experiencing a monthly household income decrease, over half reported (54%) difficulty in meeting their food and grocery needs.

<sup>&</sup>lt;sup>26</sup> Ofner et al. 2024. COVID-19 and People with Disabilities in Canada. Government of Canada. <a href="https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/guidance-documents/people-with-disabilities.html">https://www.canada.ca/en/public-health/services/diseases/2019-novel-coronavirus-infection/guidance-documents/people-with-disabilities.html</a>

<sup>&</sup>lt;sup>27</sup> United Nations. 2020. Policy Brief: A Disability-Inclusive Response to COVID-19. https://unsdg.un.org/sites/default/files/2020-05/Policy-Brief-A-Disability-Inclusive-Response-to-COVID-19.pdf

<sup>&</sup>lt;sup>28</sup> World Health Organization. 2020. Disability Considerations during the COVID-19 outbreak. https://www.who.int/publications/i/item/WHO-2019-nCoV-Disability-2020-1

<sup>&</sup>lt;sup>29</sup> Goyal et al. Impact of the COVID-19 pandemic on people with disabilities and implications for health services research. J Health Serv Res Policy. 2023 Apr;28(2):77-79. https://pmc.ncbi.nlm.nih.gov/articles/PMC9968687/

<sup>&</sup>lt;sup>30</sup> Statistics Canada. 2023. Canadian Survey on Disability, 2017-2022. https://www150.statcan.gc.ca/n1/daily-quotidien/231201/dq231201b-eng.htm