



Corporate Policy Manual

Policy Name	Policy Number	Responsible Department
Accessibility Policy	CPM-02-14	Health, Safety and Compliance
Approval Body	Approval Date	Review Date
Chief Executive Officer	November 20, 2020	November 20, 2023

Purpose

The purpose of this policy is to demonstrate Niagara Parks Commission's (NPC) commitment to providing equal treatment to people with disabilities and to provide information on the accessible standards at NPC.

Scope

This policy applies to all employees, contractors, visitors, volunteers, clients, and other persons while on NPC Property.

Partners who have tenant agreements and operating on NPC property shall have their own accessible standards.

Definitions

"Accessibility Plan" means the plan created by NPC to prevent and remove barriers for people with disabilities. An update on this plan will be provided annually and the plan will be reviewed every 5 years.

"Accessible Formats" means large print, clear text, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities. These formats include NPC information, communications, documents and emergency procedures, normally made available to the public.

"Communication Supports" means captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

"Disability" means:

- (a) any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of



paralysis, amputation, lack of physical coordination, blindness, or visual impediment, deafness or hearing impediment, muteness, or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
(b) a condition of mental impairment or a developmental disability,
(c) a learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
(d) a mental disorder, or
(e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

The definition includes disabilities that are non-visible, are temporary, may be intermittent or have varying degrees of severity. Information about any person's disability is personal and private and must be treated confidentially.

"COVID-19" means an infectious disease caused by a new virus. The disease causes respiratory illness (like the flu) with symptoms such as a cough, fever, and in more severe cases, difficulty breathing. The disease spreads primarily through contact with an infected person when they cough or sneeze. It also spreads when a person touches a surface or object that has the virus on it, then touches their eyes, nose, or mouth.

"Guide Dog" means A guide dog as defined in section 1 of the Blind Person's Rights Act.
"Medical Aid" means an assistive device including respirators and portable oxygen supplies.
"Mobility Assistive Device" means: A cane, walker, or similar aid.

"NPC" means the corporation of The Niagara Parks Commission.

"NPC Business" means all business activities related to NPC operations whether conducted on or off NPC Property. It includes situations where an individual is representing or could reasonably be perceived as representing NPC.

"NPC Property" means but is not restricted to, all land, property, structures, installations, vehicles or equipment owned, leased, operated or otherwise controlled by NPC for the purpose of conducting NPC Business.

"Personal Assistive Devices" means Any aids including communication, cognition, personal mobility, medical or technical aids that are used to increase, maintain, or improve the functional abilities of persons with disabilities. Assistive devices include, but are not limited to: wheelchairs, walkers, speech synthesizers, TTYs (Telephone Typewriters or Telephone Teletypes), computer technologies, canes and hearing devices.

"Self Service Kiosk" means interactive electronic terminal. People use them to access many kinds of products and services, ie: paying parking fees, validating tickets, buying groceries & renewing licenses

"Service Animal" means an animal that is of service to a person with a disability where the animal is used by the person for reasons relating to his or her disability. Verification of a service animal's status can be provided by way of government certification or by a letter from a regulated health professional such as an audiologist, speech-language pathologist, chiropractor, nurse, occupational therapist, physiotherapist, psychologist, registered psychotherapist, registered mental health



therapist, physician or surgeon confirming the animal is required for reasons relating to the person's disability.

"Support Person" means a person who accompanies a person with a disability to assist with communication, mobility, personal care, or medical needs or with access to goods or services.

Admission fees for accessibility support persons (when accompanying a person with a disability) who specifically identify themselves as support persons shall be waived at all NPC attractions and transportation systems. No identification will be required in order to waive the admission fee.

"Volunteer" means a person who provides services to NPC without being remunerated or paid for such service in any way. A volunteer is not required to give or entitled to receive any notice to terminate the volunteer relationship.

Policy

It is the policy of NPC to:

- Provide its goods and services in a way that respects the dignity and independence of persons with disabilities. NPC is committed to giving persons with disabilities the same opportunity or reasonable alternative to access our goods and services.
- Promote accessibility for persons with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness, and equality of opportunity.
- Ensure compliance with AODA and its accessibility standards.
- Provide accessibility and accommodation for persons with disabilities through AODA's customer service standard, integrated accessibility standard and all other standards as they are developed, and in accordance with the requirements of the Ontario Human Rights Code.
- Promote a working environment that is inclusive and that is free from barriers as outlined in the Ontario Human Rights Code. Further, NPC is committed to complying with AODA.
- Provide training to staff on the AODA standards applicable to them every three years or when a significant change has been made to the Accessibility Plan or Accessibility Policy.

Providing Goods and Services

NPC is committed to serving all guests including persons with disabilities and shall carry out its functions and responsibilities in the following areas in compliance with AODA's Accessibility Standards for Customer Service and in accordance with other applicable legislation:

Communication

NPC shall take reasonable steps to communicate with persons with disabilities in ways that consider their disability. NPC shall also ensure that all staff, volunteers and others dealing with the public on behalf of NPC are properly trained in how to communicate with guests with various types of disabilities and provide Communication Supports when possible.

Assistive Devices

NPC is committed to serving persons with disabilities who use assistive devices to obtain, use, or benefit from its goods and services. NPC shall also ensure that all staff, volunteers and others dealing with the public are properly trained and familiar with various assistive devices that may be used by customers with disabilities while accessing its goods and



services. Assistive Devices shall be cleaned and disinfected to prevent the spread of COVID 19.

NPC shall also ensure that staff knows how to use assistive devices that are accessible at NPC such as wheelchairs and TTY [Local: (905) 356-5672 or Toll Free: 1 (855) 356-5672].

Persons with disabilities are permitted and encouraged to use their own personal assistive devices to access our facilities and goods and services. Assistive devices such as communication aids, cognition aids, personal mobility aids and medical aids may be used at all NPC facilities and parklands where access is possible at the venue.

It should be noted that it is the responsibility of the person with a disability to ensure that his or her assistive device is always operated in a safe manner.

A limited number of wheelchairs are available for the visiting public at Table Rock Complex, Floral Showhouse, and Butterfly Conservatory. Information about assistive devices provided by NPC to assist persons with disabilities is available on the NPC website www.niagaraparks.com, through Niagara Parks Accessibility at accessibility@niagaraparks.com or info@niagaraparks.com , 1 (877) 642-7275 during regular business hours, Monday to Friday (8:30 a.m. to 4:45 p.m.); or after 4:45 p.m. and on weekends at (905) 358-3268, ext. 4222; or TTY [Local: (905) 356-5672 or Toll Free: 1 (855) 356-5672].

First Aid and Emergency Services

NPC is committed to ensuring that first aid and emergency services are provided for persons with disabilities when required. Staff is trained to respond to first aid and emergency matters which may occur at NPC, including how to communicate emergency information and how to offer evacuation assistance to persons with disabilities, identifying accessible and safe evacuation routes both on-site and off-site. First Aid and Emergency Services shall consider COVID-19 and may affected the services provided.

Website

Websites and web content controlled directly by NPC shall conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA in accordance with the schedule set out in the AODA Integrated Accessibility Standards.

Recruitment

NPC shall post information about the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available, upon request. NPC shall consult with any applicant who requests an accommodation in a manner that considers the applicant's disability. Successful applicants shall be notified about NPC's policies for accommodating employees with disabilities as part of their offer of employment

Billing

NPC is committed to providing accessible invoices to all its customers. For this reason, upon request, invoices shall be provided in an accessible format.

NPC shall answer any questions customers may have about the content of the invoice in an accessible manner.



Guest Admission to Park Venues and Transportation

Information about accessibility and admission provisions at NPC attractions and venues is available on NPC's website, at the respective locations or by contacting Niagara Parks Guest Service at info@niagaraparks.com

Many of NPC's historic buildings are over 100 years old and are not fully accessible. Regular individual admission will be discounted by 10% at attractions such as Journey Behind the Falls, Whirlpool Aero Car, White Water Walk and historic sites where full accessibility is not available. This discount does not apply if the customer is purchasing an admission package that is already discounted.

Admission

Admission fares and fees for accessibility support persons (when accompanying a person with a disability) who specifically identify themselves as support persons, shall be waived at all NPC attractions and transportation systems. No identification will be required to waive the admission fee and fare.

Admission to facilities on NPC sites operated by a third party through a rental or lease agreement shall not be subject to the admission provisions of this policy but shall be subject to the requirements under AODA and other legislation as applicable.

Group Sales

Groups (qualified/approved by NPC) of any size who have persons with disabilities that have pre-booked through NPC Group Sales shall be provided a group discount. Information about this discount is available on the NPC website.

Parking

When customers with an Accessible Parking Permit pay to park at any parking lot owned by NPC, they can re-park on the same day at any other NPC paid parking lot at no charge, if they retain their original parking receipt.

Use of Guide Dogs and Other Service Animals

NPC is committed to welcoming persons with disabilities who are accompanied by guide dogs or other service animals. Persons using guide dogs or other service animals are welcomed in all areas of NPC premises that are open to the public. NPC shall also ensure that all staff, volunteers, and others dealing with the public are properly trained in how to interact with persons with disabilities who are accompanied by a service animal.

Accessibility Support Persons

NPC is committed to welcoming persons with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by one support person shall be allowed to enter NPC's premises with his or her support person. At no time shall a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on NPC premises.



NPC may require that a person with a disability is accompanied by their support person at a specific location if a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others. This requirement is communicated through the NPC website and at the specific location. This would include but is not limited to such venues as Niagara's Fury, Journey Behind the Falls and the Whirlpool Aero Car. Before requiring a support person accompany a person with a disability at any attraction, NPC will consult with the person with a disability to understand their needs, consider health or safety reasons based on available evidence and determine if there is no other reasonable way to protect the health and safety of the person or others on the premises. If after all factors have been considered, and a support person is deemed required, the admission fee for the support person is waived.

Emergency Procedures, Plans and Public Safety Information

Emergency procedures, plans and public safety information that are available to the public as well as any relevant updates to these procedures, plans and information, will be made available and in an accessible format or accessible communication support upon request. Time frames for this information will be dependent upon the format requested but will be provided as soon as is practicable.

NPC staff will be trained in emergency response policies and procedures as they relate to people with disabilities, including how to communicate emergency information and how to offer evacuation assistance to people with disabilities, identifying accessible and safe evacuation routes both on-site and off-site.

Workplace Emergency procedures plans and safety information will be made available to staff in an accessible format or accessible communication support upon request. Timeframes for this information will be dependent upon the format requested but will be provided as soon as is practicable.

NPC staff with disabilities who may require assistance in an emergency are encouraged to identify their accessibility needs to their immediate supervisor so that individualized emergency accommodation plans can be created. This information will be maintained confidentially with the Human Resources and Health, Safety and Compliance departments. The individualized emergency accommodation plan will only be shared with those necessary to ensure the safe evacuation of NPC employees.

Accessibility on the WEGO Transportation System

NPC's WEGO Transportation System will be compliant the Integrated Accessibility Standards as applicable. NPC shall carry out its functions and responsibilities in the following areas in compliance with AODA's Integrated Accessibility Standards, as follows:

Fare Equity for People with Disabilities

NPC shall not charge a higher fare to persons with disabilities using the WEGO. NPC provides multiple options to persons with disabilities for fare payment on the WEGO.

Announcement Procedures

All WEGO vehicles will make pre-board announcements of the route. All WEGO vehicles will provide an audible and visual announcement of next stop (s) while vehicle is on route or in operation.



Accessibility Features and Equipment

Information regarding existing accessibility features of WEGO vehicles, routes and services such as Boarding Procedures, Route Stop Accommodations, Courtesy Seating, Mobility Assistive Device Storage and Support Person Fare Policy will be made available in accessible format or accessible communication support upon request.

Emergency Preparedness and Response Procedures

Emergency Preparedness and Response Policies shall be made available to the public and provided in an accessible format upon request.

All WEGO drivers have been trained in emergency procedures in the event of a vehicle or accessibility equipment failure.

Boarding Policy

Drivers will ensure adequate time is provided to people with disabilities to safely board, be secured and de-board vehicles and will aid with these activities upon request.

Drivers will ensure a person with a disability using a medical aid or service animal is allowed access to a WEGO vehicle.

Route Stop Accommodations

Passengers with disabilities using the WEGO will be allowed to board and de-board vehicles at the closest available location that is not an official stop if the official stop is not accessible and the safe location is along the same transit route. Location of the non-official boarding and de-boarding point will be determined by the driver, but consideration will be given to the preferences of the person with a disability.

Drivers will promptly report to the Supervisor, WEGO Transportation where a route stop is temporarily inaccessible or where a temporary barrier exists. The Manager will ensure that passengers and appropriate staff are informed accordingly.

Priority/Courtesy Seating

NPC will establish and clearly mark with signage, priority/courtesy seating areas for people with disabilities on each WEGO vehicle.

Seating will be located as close as practicable to the entrance doors. Priority/courtesy seating shall have signage to indicate passengers without disabilities must vacate courtesy seating when required by a person with a disability.

Information about priority/courtesy seating on WEGO buses can be found on the website at www.niagaraparks.com , WEGO website at www.niagaraparks.com/wego/ or by contacting Niagara Parks Accessibility as noted above.

Notice of Service Disruptions

From time to time, temporary service disruptions will be experienced at NPC facilities. NPC is committed to making reasonable efforts for its guests in these instances to ensure that services are reinstated as quickly as possible and that alternative services are provided where feasible.

In these instances of service disruptions, NPC shall provide its guests with reasonable



notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice shall include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Notice of these temporary disruptions shall be provided in a conspicuous place and manner at the respective locations, NPC Welcome Centres and through internal communication systems. The steps to be taken in connection with a temporary disruption will be available at the location and shall be provided to guests as requested.

In the event of a long-term disruption, information shall also be posted on the NPC and WEGO websites.

Training

NPC shall provide training to all its employees, volunteers and all those who are involved in the development and approval of NPC policies, practices, and procedures. This training shall be provided as part of orientation training for all new employees, volunteers and others who have been retained by NPC and require training in accordance with AODA.

A review of the purposes of the AODA and the requirements of the Integrated Accessibility Standards Regulation IASR (Ontario Regulation 191/11) and instruction about the following matters:

- How to interact and communicate with persons with various types of disability.
- How to interact with persons with disabilities who use assistive devices or require the assistance of guide dogs or other service animals or the assistance of support persons.
- How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability.
- What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services; and,
- A review of the requirements of other accessibility standards referred to in the AODA Integrated Accessibility Standards and the Human Rights Code as it pertains to persons with disabilities.
- A review of NPC's Accessibility Policy

NPC is committed to providing training on an ongoing basis to ensure that employees and those associated with NPC are informed about changes or requirements respecting the provision of goods and services to persons with disabilities. Training shall be provided in a timely manner to ensure that employees are prepared to assist persons with disabilities.

The Human Resources Department shall keep a record of those employees and others who have been trained on AODA, the accessibility standards, and the Human Rights Code, including the dates on which the training is provided and the number of individuals to whom training is provided.

NPC staff and others who deal with the public on behalf of NPC are aware of their obligation to protect confidential and personal information obtained while at work.

Feedback

NPC welcomes comments on the provision of its goods and services and how well customers' expectations are being met. This feedback will enable NPC to improve its customer service and the guest experience for persons with disabilities.

Feedback regarding the way NPC provides goods and services to persons with disabilities can be made verbally at NPC facilities, through the NPC website, via email at accessibility@niagaraparks.com or by contacting or writing to:

Accessibility Niagara Parks
The Niagara Parks Commission



P.O. Box 150
7400 Portage Road
Niagara Falls, ON
L2E 6T2

This feedback process permits persons to provide their feedback in person, by telephone, or by email or otherwise.

The feedback process at NPC is set up to resolve concerns in a timely, fair, and respectful manner. NPC is committed to providing an accessible and open process which ensures the opportunity to understand the issue, take prompt action and ensure ongoing follow up as required. The following guidelines shall be followed for such concerns:

- a) All concerns shall be documented and acknowledged in a timely manner.
- b) Confidentiality shall always be respected.
- c) Reasonable efforts shall be made to review and respond to a concern within 30 days.
- d) Appropriate follow up and monitoring shall be undertaken to prevent a reoccurrence of the problem.
- e) A summary of concerns shall be provided to the Executive Team to ensure appropriate action is taken.
- f) Employees shall understand the concern resolution process and shall be readily willing to cooperate with the processing of concerns.
- g) NPC shall track and respond to any trends identified through the concern resolution process.

Document Availability

Notice of the availability of all documents in alternate formats is available on the NPC website. If a person with a disability requests these documents, they shall be provided by NPC in a format that considers the person's disability, as agreed upon by NPC and the requester. This provision will also be in accordance with the requirements and timelines set out in AODA's Standard for Information and Communications. NPC will use the applicable Accessibility guideline to prepare accessible documents and materials for persons with disabilities.

Accessibility Plan

NPC will create an Accessibility Plan every 5 years with specific actions, assigned dates and assigned individuals and departments to remove barriers for those with disabilities. An update on this plan will be provided to the public on an annual basis.

Design of Public Spaces

Public spaces that are newly constructed or redeveloped by NPC shall meet the accessibility requirements set out in the AODA Design of Public Spaces Standards, including the following areas:

- Recreation Trails and Beach Access Routes
- Outdoor Public Use Eating Areas
- Outdoor Play Spaces
- Exterior paths of Travel
- Accessible Parking
- Service counters, queuing guides and waiting areas
- Consultation with the public and persons with disabilities



In addition to incorporating accessible design requirements in new or renovated public spaces, the updated NPC Accessibility Plan will document procedures for maintenance of the accessible elements, and for dealing with temporary disruptions of accessible elements

Self Service Kiosks

NPC will ensure that accessibility features are incorporated when designing, purchasing, or acquiring self-service kiosks. These features may include technical items such as colour contrast on display screen, extra time for people to complete tasks, audio instructions or voice-activated equipment. Some structural features that may be considered include the height and stability of the kiosk, headset jack with volume control, or specialized keypads. Finally, NPC will consider the mobility of the person accessing the kiosks.

Roles and Responsibilities

CEO/Executive Team/Directors

- Provide leadership and support to ensure the implementation of this policy
- Ensure that all required employees have received current training in appropriate facets of the investigation process
- Ensure that the progress report on the Multi-Year Accessibility Plan is presented in an annual public consultation meeting
- Ensure compliance where required

Managers/Supervisors

- Ensure that all employees are made aware of this policy through a communication tool (e.g. Health and Safety Orientation, NPC Safety Talks, Learning Management System, policy review)
- Provide a report on the Multi-Year Accessibility Plan on an annual basis
- Ensure that employees who report to them have been trained on this policy
- Communicate with those with disabilities as needed
- Participate in the Accessibility Program at NPC

Employees

- Participate in accessibility as required
- Receive communication and participate in training on accessibility

Health, Safety and Compliance Department

- Ensure the development and maintenance of this policy
- Prepare the annual Accessibility public consultation meeting
- Follow up and ensure respective departments are providing updates on their portion of the Multi-Year Accessibility Plan
- Recommend amendments to this policy as necessary



- Monitor compliance with this policy

Human Resources

- Ensure accessibility training is tracked for employees
- Provide accessible formats and provide required accommodations during the recruitment process
- Notify successful candidates of our Accommodation/ESRTW Policy
- Create Accommodation Plans for those with restrictions in the workplace

First Aid Trained Employees

- Assess the person with an Injury
- Provide care when possible, with a consideration for personal precautions

Education and Training

All employees shall be made aware of this policy through one of the following: NPC Safety Talks, Health and Safety Orientation, or review on the Learning Management System (LMS).

All employees shall receive Accessibility Training upon hire and every 3 years as a refresher.

Related Policies

Health and Safety Policy (CPM-10-01)
First Aid Policy (CPM-10-42)
Emergency Response Plan (CPM-10-35)
Accommodation and ESRTW (CPM-10-36)

Related Procedures

Related Procedures

References and Consultation

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11
Integrated Accessibility Standards O. Reg.191/11
City of Toronto – Accessibility Policy
Niagara Parks Multi-Year Accessibility Plan (2018-2022)



Record of Changes

<u>Version No.</u>	<u>Date</u>	<u>Section/Content Changed</u>	<u>Change Made / Reason for Change</u>	<u>Change By</u>
2	November 9, 2020	Definitions	Added Accessibility Plan, COVID 19, NPC, & NPC Business	P. Johnson
2	November 9, 2020	Providing Goods and Services	Recruitment	P. Johnson
2	November 9, 2020	Training	Training on Integrated Accessibility Standards and NPC Policy	P. Johnson
2	November 9, 2020	Added Sections	Accessibility Plan and Design of Public Spaces	P. Johnson
2	November 9, 2020	Roles and Responsibilities	Added Managers/Supervisors, Employees, Health, Safety & Compliance and Human Resources	P. Johnson
2	November 9, 2020	Education and Training	Training requirement for new hire and every 3 years	P. Johnson
2	November 20, 2020	Self Service Kiosks	Added section/Requirement of legislation	P. Johnson

Authorization

 Name: David Adames
 Title: Chief Executive Officer
 Date: November 20, 2020