

Name of Policy:	Accessibility		
Policy Number:	CPM-02-14		
Responsibility:	Administration		
Approval:	General Manager		
Approval Date:	June 30, 2016	Date of Next Review:	June 30, 2020

1.0 Purpose

This policy updates the existing Accessibility policy of The Niagara Parks Commission (NPC) and implements the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) which took effect January 1, 2012.

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is intended to facilitate full accessibility throughout the Province of Ontario for persons with disabilities.

AODA will develop, implement and enforce accessibility standards in order to achieve accessibility by 2025 in the following areas:

- customer service
- information and communication
- transportation
- employment
- built environment

The Accessibility Standards for Customer Service, Ontario Regulation 429/07, came into effect on January 1, 2008 and required compliance by January 1, 2010.

The Integrated Accessibility Standards, Ontario Regulation 191/11, for Information and Communication, Employment and Transportation came into effect on June 3, 2011 and was enforced on July 1, 2011. This policy governs the requirements of Ontario Regulation 191/11 and applies to the operations of The Niagara Parks Commission and the new WEGO transportation system of NPC.

Information about AODA and its compliance requirements is available at the following site www.AccessON.ca.

2.0 Scope

This policy applies to all NPC Commissioners, employees, contractors, visitors, volunteers, clients and other persons engaged in business at NPC.

3.0 Definitions

“Accessible Formats” means:

Large print, clear text, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

“Bus” or “Vehicle” means:

A motor vehicle designed for carrying 10 or more passengers and used for the transportation of persons.

“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.

“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.

“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.

“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:

Any one person who accompanies a person with a disability in order to help 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 freely chooses to provide 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.

4.0 Policy

4.1 NPC Commitment

In fulfilling our mission, NPC strives at all times 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.

It is the policy of NPC to promote accessibility for persons with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness and equality of opportunity. This commitment is established through this policy of NPC and the practices and procedures implemented by NPC concerning its operations and guest experience. NPC is committed to compliance with AODA and its accessibility standards. NPC shall 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.

NPC is committed to providing 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. To that end, NPC has developed accessibility processes for the screening, selection and hiring of applicants with disabilities as well as supporting existing employees with disabilities. Further information about these policies and procedures is available through the Human Resources Department.

4.2 Providing Goods and Services to Persons with Disabilities

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:

4.2.1 Communication

NPC shall take reasonable steps to communicate with persons with disabilities in ways that take into account 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.

4.2.2 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.

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 operated in a safe manner at all times.

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 or through Niagara Parks Accessibility at accessibility@niagaraparks.com, (905) 295-4377, ext. 3440, FAX (905) 295-4142; 1-877-NIA-PARK 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].

4.2.3 First Aid and Emergency Services

NPC is committed to ensuring that first aid and emergency services are provided for all persons with disabilities when required. Staff is trained to respond to first aid and emergency matters which may occur at Niagara Parks, 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.

4.2.4 Billing

NPC is committed to providing accessible invoices to all of 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.

4.3 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 Accessibility as noted above or by email <mailto:accessibility@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 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 in order 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.

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, as long as they retain their original parking receipt. Staff is trained to notify persons with disabilities of this provision.

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.

4.4 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.

4.5 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.

4.6 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 to the public 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 situation are encouraged to identify their accessibility needs to their immediate supervisor so that individualized emergency accommodation plans can be created. This information will also be maintained confidentially with the Human Resources and Health, Safety and Environment departments.

4.7 Accessibility Plan for WEGO Transportation System

NPC's WEGO Transportation System will be in compliance with 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 provide assistance for 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 Manager, 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.

4.8 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.

4.9 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.

This training shall include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards and Integrated Accessibility Standards;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- How to use the equipment or devices available at NPC that may assist a person with a disability;
- Know what to do if a person with a particular type of disability is having difficulty accessing NPC's goods and services;
- Overview of NPC's obligations to provide alternate formats and communication supports upon request including related processes; and
- How to interact and communicate with persons with various types of disabilities including provision of alternative formats.

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 during the course of their work.

4.10 Feedback Process

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 or by contacting or writing to:

Accessibility Niagara Parks
The Niagara Parks Commission
Visitor Experiences
P.O. Box 150
7400 Portage Road
Niagara Falls, ON
L2E 6T2
accessibility@niagaraparks.com
TTY Local: (905) 356-5672 or Toll Free: 1 (855) 356-5672

Business Hours: (905) 295-4377, ext. 3440; FAX (905) 295-4142; 1-877-NIA-PARK, Monday to Friday during regular working hours (8:30 a.m. to 4:45 p.m.)

After Hours/Weekends:
(905) 358-3268, ext. 4222, or FAX (905) 358-7326

This process permits persons to provide their feedback in person, by telephone, or by delivering an electronic text 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 be respected at all times.
- 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 General Manager and the respective Director and Site Manager or Supervisor to ensure appropriate action is taken.
- f) Employees shall have a working knowledge of the concerns 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 concerns resolution process.

4.11 Document Availability

Notice of the availability of all documents required by AODA's Accessibility Standards for Customer Service and the Integrated Accessibility Standards shall be posted on NPC's website.

All required documents including policies/practices/procedures, information regarding service disruptions, training records and feedback process shall be available through the NPC website or by contacting Accessibility Niagara Parks.

If a person with a disability requests these documents, they shall be provided by NPC in a format that takes into account the person's disability, as agreed upon by NPC and the requester. This provision will also be in accordance with the requirements and time lines set out in AODA's Standard for Information and Communications. NPC will use the Accessibility Style Guide, November 2014 to prepare accessible documents and materials for persons with disabilities.

5.0 Roles and Responsibilities

Senior Management

- General Manager will ensure that a progress report on the Multi-Year Accessibility Plan is presented at an annual public consultation meeting
- Ensure compliance with AODA and its accessibility standards
- Review this policy as needed but not less than every four years to ensure compliance

Department Managers and Supervisors

- Department Heads to report to General Manager on their respective program elements on annual basis
- Ensure that all staff and others are aware of this policy and ensure its implementation
- Ensure that all staff are trained in accordance with legislative requirements

6.0 Related Policies

Employment Policy

Accommodation

Procurement

NPC Emergency Response Plan and associated policies

7.0 References

Accessibility for Ontarians with Disabilities Act, 2005
Ontario Regulation 429/07 Accessibility Standards for Customer Service
Ontario Regulation 191/11 Integrated Accessibility Standards
Ontario Human Rights Code

John Lohuis, General Manager

Date