



City of Kingston
Report to Municipal Accessibility Advisory Committee
Report Number MAAC-22-012

To: Chair and Members of the Municipal Accessibility Advisory Committee

From: Neil Carbone, Commissioner, Corporate Services

Resource Staff: John Bolognone, City Clerk

Date of Meeting: November 3, 2022

Subject: 2023 – 2025 Multi-Year Accessibility Plan

Council Strategic Plan Alignment:

Theme: Regulatory & compliance

Goal: See above

Executive Summary:

The purpose of this report is to transmit the 2023 – 2025 Multi-Year Accessibility Plan, attached to this report as Exhibit A, to the Committee for review and recommendation for approval to Council. Provincial legislation requires municipalities to develop a multi-year plan for accessibility and to review the plan at least once every five years. The purpose of this plan is to outline Kingston’s strategy to prevent and remove barriers to accessibility and meet the requirements established under the Integrated Accessibility Standards Regulation.

Recommendation:

That the Municipal Accessibility Advisory Committee recommend to Council at its meeting scheduled for November 10, 2022:

That the 2023 – 2025 Multi-Year Accessibility Plan, attached as Exhibit A to Report Number MAAC-22-012, be approved.

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Authorizing Signatures:

p.p. ORIGINAL SIGNED BY COMMISSIONER

**Neil Carbone, Commissioner,
Corporate Services**

ORIGINAL SIGNED BY CHIEF ADMINISTRATIVE OFFICER

**Lanie Hurdle, Chief
Administrative Officer**

Consultation with the following Members of the Corporate Management Team:

- | | |
|---|-------------------------------------|
| Paige Agnew, Commissioner, Community Services | <input checked="" type="checkbox"/> |
| David Fell, President & CEO, Utilities Kingston | Not required |
| Peter Huigenbos, Commissioner, Business, Environment & Projects | <input checked="" type="checkbox"/> |
| Brad Joyce, Commissioner, Transportation & Public Works | <input checked="" type="checkbox"/> |
| Desirée Kennedy, Chief Financial Officer & City Treasurer | <input checked="" type="checkbox"/> |

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Options/Discussion:

As required by the Integrated Accessibility Standards Regulation (IASR), Ontario Regulation 191/11, public sector organizations, including municipalities, must develop a multi-year accessibility plan and review the plan at least once every five years. The accessibility plan must outline the municipality's strategy to prevent and remove barriers to accessibility and meet the requirements established under the Regulation.

The purpose of this report is to transmit to the Committee, for its recommendation to Council for approval, the 2023 – 2025 Multi-Year Accessibility Plan (the Plan). The Plan builds upon the City's previous accessibility plans, the [2018 – 2022 Multi-Year Accessibility Plan](#) and the [2013 – 2017 Multi-Year Plan and Strategic Action Items](#). Many of the legislated timelines for compliance with the IASR and the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) for municipalities like Kingston have already passed; therefore, the 2023 – 2025 Plan focuses on moving beyond the legislated requirements and attaining a higher standard of accessibility. The Plan has been reduced to a three-year timeframe as many of the final requirements of the IASR and AODA have a compliance deadline of 2025, and staff anticipate legislative changes may be coming in this field.

As detailed in the Plan, attached to this report as Exhibit A, consultation on the contents of the Plan has occurred throughout 2022. In addition to two separate public engagement opportunities with the Kingston community as a whole, staff retained the services of Two Canes Consulting to conduct their own review of the draft Plan. Additionally, Two Canes conducted small group and individual feedback sessions on the draft Plan with members of the accessibility community in Kingston. A copy of their report is attached to this report as Exhibit B. Internal consultation was also conducted with all City Directors, coordinated by the City Clerk's Department in its role in leading the Accessibility Office for the City.

The Plan can be understood in two separate sections. The first section contains background information on the legislative requirements for accessibility in Ontario, the City's Municipal Accessibility Advisory Committee and a summary of the public engagement conducted for the Plan. The second section of the plan contains the planned strategies for the removal and prevention of barriers. This section is divided into five parts, based on the five standards of the IASR: customer service, information/communication, employment, transportation and design of public spaces. Each of the five parts details an overall principle related to accessibility, along with specific strategies to reduce barriers and improve accessibility that the City intends to achieve during the timeframe for the Plan.

As required by the IASR, an annual update will be provided to City Council, through the Municipal Accessibility Advisory Committee, on the progress made on the planned strategies contained in the Plan.

Existing Policy/By-Law:

[Accessibility for Ontarians with Disabilities Act, 2005](#)

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[Ontario Regulation 191/11, Integrated Accessibility Standards Regulation](#)
[2018 – 2022 Multi-Year Accessibility Plan](#)

Notice Provisions:

None

Accessibility Considerations:

This Plan describes the strategies that the City will undertake during the lifetime of the plan to reduce barriers to and increase the accessibility of City programs, services and facilities for all Kingston residents.

Financial Considerations:

None

Contacts:

John Bolognone, City Clerk 613-546-4291 extension 1247

Other City of Kingston Staff Consulted:

Muhammad Ahsan, Equity, Diversity and Inclusion Manager

Derek Ochej, Acting Deputy City Clerk, City Clerk's Department

All City Directors were consulted and provided the opportunity to review drafts of the report prior to its approval.

Exhibits Attached:

Exhibit A – 2023 – 2025 Multi-Year Accessibility Plan

Exhibit B – Two Canes Consulting, Community Feedback Report: City of Kingston Draft Accessibility Plan

2023 – 2025 Multi-Year Accessibility Plan

Executive Summary

The Integrated Accessibility Standards Regulation (IASR), Ontario Regulation 191/11, as established by the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), requires designated public sector organizations (including municipalities) to develop a multi-year accessibility plan and to review the plan at least once every five years. The accessibility plan is to outline the municipality's strategy to prevent and remove barriers to accessibility and meet the requirements established under the Regulation.

The 2023 – 2025 Multi-Year Accessibility is the third plan created by the City of Kingston, following the [2013 – 2017 Multi-Year Accessibility Plan](#) and the [2018 – 2022 Multi-Year Accessibility Plan](#). The 2023 – 2025 plan will build upon the foundation established by the previous two plans, which were focused on ensuring that the accessibility standards created for designated public sector organizations were met. With most deadlines having passed, the focus of this plan will be on removing barriers and improving access above and beyond the legislated requirements and ensuring accessibility considerations are incorporated into the day-to-day operation of the City of Kingston.

Legislated Background

In December 2001 the province of Ontario passed the *Ontarians with Disabilities Act*, (ODA) which required all municipalities to assist in the identification, removal, and prevention of accessibility barriers. The ODA's successor legislation, the AODA, was passed in 2005 with the purpose of developing, implementing, and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises. Contained within the AODA were several deadlines for compliance with accessibility standards, with deadlines varying dependent on the size and scope of an organization.

Five standards were developed under the AODA: Information and Communication, Employment, Transportation, Design of Public Spaces and Customer Service. In 2011, these standards were combined into a single standard, the Integrated Accessibility Standards Regulation (IASR).

Municipal Accessibility Advisory Committee

Section 29 of the AODA states that every municipality with a population of not less than 10,000 shall establish an accessibility advisory committee and that the majority of members of the committee shall be persons with disabilities. Kingston established its accessibility advisory committee, the Municipal Accessibility Advisory Committee (MAAC), in 2003. The Committee consists of 15 members of the public, the majority of whom are persons with disabilities, and one member of City Council.

MAAC's duties as established by both the AODA and City of Kingston By-Law Number 2010-205, the Committee By-Law, are to:

- Advise Council about the requirements and implementation of accessibility standards and preparation of accessibility reports, including the annual Multi-Year Accessibility Plan update;
- Review site plans and drawings as described by Section 41 of the *Planning Act*;
- Provide advice to Council on the accessibility of a building, structure, or premise that the City owns, constructs, renovates or enters into a lease for;
- Provide advice to Council regarding the City's purchase of goods or services through the City's procurement process; and
- Consult with and advise City staff and Council regarding accessibility issues as requested.

Two working groups are established under MAAC to provide more detailed examination of priority areas of work for the Committee. The mandate of the Awareness & Education Working Group and the Built Environment Working Group can be found below:

Awareness & Education Working Group

- To enhance public awareness about accessibility through the development of educational campaigns, such as National AccessAbility Awareness Week;
- To advise MAAC on the requirements of IASR standards;
- To select the recipients of the annual Celebrating Accessibility Awards and host the awards presentation event as part of celebrations for the International Day for Persons with Disabilities; and
- To provide accessibility office staff with advice regarding the lived experience of persons with disabilities accessing City services and programs.

Built Environment Working Group

- To advise MAAC on the requirements of the IASR Design of Public Space standard;
- To review site plans and drawings as detailed by Section 41 of the *Planning Act*;
- To advise on the City of Kingston Facility Accessibility Design Standards (FADS); and
- To provide advice to City staff on matters related to the construction or renovation of buildings, structures, or premises that the City purchases, constructs or enters into a lease on;

In addition to the Working Groups, MAAC members serve on project teams as outlined in the Accessible Consultation Process Policy. Led by City staff, these project teams cover a variety of areas, including built environment, policy, and programming. MAAC members provide City staff with feedback and advice on accessibility aspects of City work but are not responsible for ensuring compliance with legislation.

Accessibility and Equity, Diversity and Inclusion (EDI)

In 2021 the City of Kingston hired a Manager of Equity, Diversity and Inclusion, with the position responsible for the creation and execution of a multi-year work plan to address internal and external aspects of equity, diversity and inclusion (EDI) for the City of Kingston.

Also in 2021, the first members of the City's Equity, Diversity and Inclusion Advisory Committee were appointed by Council. The Committee is comprised of five community members who are part of a population that faces systemic barriers to employment, four community members who represent organizations or groups in a variety of EDI-related sectors and two members of City Council. The mandate of the Committee is to provide guidance to staff and Council in the development of policies, initiatives and programs aimed at reducing barriers in the workplace at the City of Kingston and fostering diversity and inclusion in all areas of the organization, both internal and external.

The EDI Office and EDI Advisory Committee maintain separate operations from the City's Accessibility Office and MAAC, however it is important to recognize that accessibility is a key component of EDI and vice versa. This relationship will necessitate the need for the groups to work together in partnership throughout the Multi-Year Accessibility Plan and provides an opportunity for a greater holistic approach to accessibility and its intersectionality with the topic of EDI.

Public Engagement

Consultation with residents of Kingston is a vital component in the creation of this plan. In March 2022, residents were given an opportunity to contribute their ideas for potential inclusion in the Multi-Year Accessibility Plan via a project page on the City of Kingston’s public engagement platform, Get Involved Kingston. In the month-long period, 33 individual ideas were submitted; staff reviewed the ideas and coded them based on the five IASR standards. Below is a table summarizing the number of ideas sorted by the standard to which they most related:

Standard	Number of Comments Received
Design of Public Spaces	16
Information & Communication	6
Transportation	3
Employment	0
Customer Service	0
Out of scope	8

Design of Public Spaces ideas were primarily related to improving sidewalk plowing and snow removal and designing more intuitive pathways and walkways for pedestrians and cyclists. Other ideas received included improving visibility of road and street signage, lowering speed limits, the installation of universal change tables in all public City facilities and the establishment of ‘nap pods’ for those who experience altered consciousness (e.g., narcolepsy, epilepsy).

Information and Communication ideas included messaging regarding the rules and regulations for services dogs, providing seniors with basic computer training, providing closed captioning and ASL interpretation for City Council meetings, implementing accessible wayfinding throughout the City and creating a lending program for assistive devices such as wheelchairs or scooters.

Transportation ideas included adding Kingston Transit stops on the property of the VIA Rail train station and Providence Care Hospital, as well as the installation of benches at every transit stop.

Seven ideas were received that were categorized as outside of the scope of this plan. Some were related to the field of accessibility and public health (i.e., support for Universal Basic Income, improve communication opportunities between residents and medical professionals), while others were not related to accessibility as outlined by the standards of the IASR.

A summary of ideas received during this phase of engagement can be found on the Get Involved Kingston [website](#).

A second phase of engagement was conducted between June and August 2022. A first draft of the [2023 - 2025 Multi-Year Accessibility Plan](#) was posted on Get Involved Kingston, with residents having the option to ask questions regarding the plan. A total of 10 questions were received, a summary of which can be found on the Get Involved Kingston [website](#).

Copies of the plan were also made available at City recreation facilities, with residents having the ability to leave comments on the Plan.

Below is a table summarizing the number of ideas sorted by the standard to which they most related. In some cases, comments contained multiple topics or topics that spanned multiple standards:

Standard	Number of Comments Received
Design of Public Spaces	8
Information & Communication	1
Transportation	3
Employment	1
Customer Service	0
Out of scope	1

Staff hired Two Canes Consulting to conduct an arms-length review of the Plan, which included one-on-one and small group sessions designed to receive feedback from Kingston residents with disabilities. A full summary of their findings is included in Report Number MAAC-22-012, with a general summary of the main findings provided below:

- Training of staff and creating general awareness in the community regarding the prevalence of disability, categories of disability (permanent, temporary and situational) and non-visible or hidden disabilities. Emphasis was placed on assisting the business community in better understanding this area and the use of City-wide awareness campaigns to do so.
- Consider the diverse range of technology access and literacy when implementing accessibility solutions, keeping in mind the importance of alternate communications means that do not rely on technology.

- In designing public spaces, continue to identify options for improving seating, lighting, audio alerts and tactile walking surface indicators, as well as making the public more aware of accessible parking and public washroom locations.
- Keeping in mind that cost can be a barrier for persons with disabilities when seeking to access shows and performances in the arts and culture sector.
- Continue to work on instituting best practices with respect to accessible employment in terms of communicating policies during recruitment and hiring.

The consultation conducted by Two Canes also revealed that some accessibility initiatives that the City is already undertaking, such as providing discounted ticketing options for arts and culture performances, require greater promotion to make Kingston residents more aware of their availability.

It is important to note that it was not feasible to include all comments or suggestions received in the public engagement in the Planned Strategies section which begins on the following page. Restraints based on budget, Council-approved strategic plans, and service requirements from other levels of governments were factors in determining what strategies could be achieved by staff during the timeframe of this Plan.

An example of the above are suggestions received to increase service for sidewalk snow plowing/removal or to prioritize this service over road snow removal. Provincial regulations require that certain standards be met for snow plowing/removal on roads; this coupled with equipment and staffing limitations make it difficult to commit to an increased level of service. Staff will continue to work towards this goal where possible, bearing in mind the restrictions.

A list of these ideas can be found in Exhibit A – Strategies for Potential Future Implementation.

Planned Strategies for the Removal and Prevention of Barriers

In addition to meeting the standards as prescribed in the IASR, the City of Kingston has general guiding principles for each of the five standards. These five principles can be found at the beginning of each section to follow, along with goals to achieve greater accessibility and remove barriers within that standard.

Customer Service

The City of Kingston will ensure that interactions between City employees and residents respects the dignity, independence, integration, and equal opportunity for all people. Policies and procedures will be put in place to support this principle.

Goals

- Implement a new fare payment system for Kingston Transit that will increase the number of ways that passengers can purchase and obtain their transit fares. The new system will include options to purchase fares including multi-ride tickets and bus passes without having to visit a physical location.
- Kingston Transit and Kingston Access Services will explore a pilot program to allow Kingston Access Bus passengers to use their monthly transit passes interchangeably on both services at no additional cost to passengers.
- Examine the potential for integration of real-time ASL interpretation for City Council meetings as part of meeting management software upgrades.
- Implement technology solutions such as real-time video ASL interpretation and counter-loop systems at City facilities.
- Explore training opportunities for staff in a variety of areas related to accessibility including homelessness and mental health, unconscious bias, neurodiversity, inclusive language, and micro-aggression.
- Complete facility upgrades including improved contrasting between flooring and walls, installing accessible furniture and washrooms for residents, and making necessary accommodations to allow for on-site visits/appointments for medical services such as dental and audiology at Rideaucrest Home.
- Continue to improve access related to the patron experience at the Kingston Grand Theatre through ongoing staff training and based on industry best practices. Work to remove barriers related to accessing arts funding through the City of Kingston Arts Fund.

Information and Communication

The City of Kingston will communicate with residents using a variety of methods and techniques to ensure that information is available to all residents in the format that best suits their needs. The City will actively seek feedback regarding the accessibility of programs and services from all residents.

Goals

- Review and update the Corporate Accessibility Standards Policy and the Accessible Consultation Process Policy.

- Launch a new City of Kingston website, with a focus on improving user experience and presenting content in a more accessible format that is less reliant on PDF-based documents.
- Hire an accessibility coordinator to broadly examine digital accessibility across the Corporation.
- Continue to provide information on City programs and services using the widest variety of communications tools possible to ensure that all residents have an opportunity to stay informed.
- Continue to solicit, receive, and incorporate, where possible, suggestions from residents, in particular Kingston Transit riders, regarding accessibility improvements for bus stops and bus stop signage.
- Update priority seating policy and install new priority seating signage on buses consistent with priority seating signage used by other conventional transit provide in Ontario, an example of which is provided below.



- Update the Kingston Transit accessible services handbook.
- Conduct a public awareness campaign targeting residents and business owners regarding the rules and regulations for service animals.
- Continue to engage with businesses groups and organizations to share information and uncover opportunities to educate and inform businesses on the importance of accessibility. Staff will explore opportunities to work with businesses specializing in the field of accessibility for the provision of these education opportunities.
- Update and launch an interactive mapping tool based on the City website that highlights accessibility features at City facilities and parks.

- Provide multiple points of entry for residents related to arts programming and projects, including Grand OnStage and the installation of temporary and permanent public art projects.

Employment

The City of Kingston will support the recruitment of potential employees and retention of current employees by ensuring that policies, practices, and workplaces are accessible.

Goals

- Examine job requirements and minimum qualifications to reduce barriers to application for persons with disabilities and ensure only bona fide qualifications are listed.
- As part of grant funding secured in 2022, continue implementation of program aimed at instituting equity, diversity, and inclusion practices into employment practices. As part of Phase 2 of this program, successes of the program will be shared with neighbouring municipalities.
- Continue the use of the DiscoverAbility Network, a closed job board that allows employers to connect directly with persons with disabilities seeking employment.
- Seek out grants and funding sources from the federal and provincial levels of government to promote equitable and gainful employment through community programs.

Transportation

The City of Kingston will ensure that public transit and transit infrastructure is accessible to all residents through the prevention and removal of barriers.

Goals

- Implement touchless mobility securement systems on all new bus purchases allowing transit passengers using mobility devices to independently secure themselves.
- Continue to invest in the upgrading of bus shelters, stop infrastructure and connectivity to pedestrian access points such as sidewalks and pathways.
- Consult with the persons with disabilities, residents, and the Municipal Accessibility Advisory Committee on the availability of on-demand accessible

taxicabs and report on the progress made towards meeting the need for on-demand accessible taxicabs via annual updates to this plan.

Design of Public Spaces

The City of Kingston will ensure that all newly constructed or significantly renovated public spaces, such as buildings and parks, are accessible to residents through compliance with the Ontario Building Code and the City of Kingston Facility Accessibility Design Standards.

Goals

- Continue inter-departmental collaboration between Public Works and Engineering Services to ensure that accessible features in parks and public space are installed and properly maintained. This includes but is not limited to tables, play equipment and rest benches.
- Complete redesign of the public recycling depot at the Kingston Area Recycling Centre to improve physical accessibility of waste bins and create improved access for persons using mobility devices.
- Continue to implement the Step Safe program, a public reporting process to identify sidewalk trip hazards requiring repair.
- Renovate the following City facilities accessed by the public. All improvements will comply with the accessibility requirements of the Ontario Building Code and FADS:
 - Design changes to physical layout of Council Chamber in City Hall;
 - Restoration of driveway and fountain at Frontenac County Court House;
 - Renovations and expansion for 610 Montreal Street, future site of Kingston Indigenous Languages Nest (KILN);
 - Repairs to front entrance pathways, ramp, and stairs at 1211 John Counter Boulevard;
 - Continue renovations of resident washrooms at Rideaucrest Home (see Customer Service for details);
 - Renovations to Isabel Turner Library Branch.
- Review potential incorporation of EDI principles connected to accessibility for inclusion in FADS.

- Continue to improve active transportation opportunities by connecting gaps in sidewalk connectivity throughout the city, and by adding and upgrading pedestrian crossings.
- Create a connected pedestrian corridor, including filling sidewalk gaps and constructing cycling facilities on Bayridge Drive along the five kilometre segment between Henderson Drive and Catarqui Woods Drive. This work will include upgrading the signals at 10 intersections to audible pedestrian signals and accessibility upgrades at Kingston Transit bus stops, including the installation of Kingston Transit stations.
- Install audible pedestrian signals as part of standard infrastructure upgrade programs, in addition to targeted replacements of aging signal infrastructure.
- Improve physical access related to the performance areas within the Kingston Grand Theatre (where possible).
- Continue to work with a dedicated MAAC Project Team to ensure accessibility related to temporary and permanent public art projects.

Conclusion

As Kingston embarks upon its third Multi-Year Accessibility Plan, the goal of making City of Kingston programs and services accessible to all Kingston residents remains. Significant improvements to accessibility have been made since the passage of the ODA more than 20 years ago. The evolution of accessibility in Kingston is moving beyond meeting legislative requirements and into a phase of maintaining and including accessibility considerations on an operational basis. With the additional focus of an equity, diversity and inclusion lens, the ability to tackle accessibility needs from an intersectional perspective becomes greater.

The City of Kingston would like to express its thanks to the members of the Municipal Accessibility Advisory Committee, partner organizations in the field of accessibility, City staff, residents, and all who participate in the creation of this plan.

For more information regarding accessible municipal programs, services, and facilities visit the City website at www.cityofkingston.ca/accessibility. This document is available in alternate formats upon request, by contacting 613-546-0000 or contactus@cityofkingston.ca.

Glossary of Key Terms

[Accessibility for Ontarians with Disabilities Act](#) (AODA) – provincial law that sets out a process for developing and enforcing accessibility standards.

Accessible Consultation Process Policy – the policy that sets out a process for City staff and Municipal Accessibility Advisory Committee members to follow a clear consultation process which applies to City services and projects that fall within the definitions noted within the policy.

[Corporate Accessibility Standards Policy](#) – provides the overarching framework to guide the review and development of the City of Kingston policies, standards, procedures, by-laws and guidelines to comply with the IASR.

[Facility Accessibility Design Standards](#) (FADS) – the City of Kingston document that addresses accessibility requirements and the needs of persons with disabilities in the design and construction of new facilities, as well as the retrofit, alteration or addition to existing facilities, owned, leased or operated by the City.

[Integrated Accessibility Standards Regulation](#) (IASR) – establishes the accessibility standards for each of information and communications, employment, transportation, the design of public spaces and customer service; more details on each standard are provided below:

Information and communications standards – help organizations make their information accessible to people with disabilities.

Employment – helps make hiring and employee support practices more accessible.

Transportation – makes it easier for everyone to travel in the province.

Design of public spaces – helps organizations make new and redeveloped outdoor public areas accessible.

Customer service – helps remove barriers for people with disabilities so they can access goods, services or facilities.

[Municipal Accessibility Advisory Committee](#) – a committee of Kingston City Council comprised of one Council representative and 15 members of the community, the majority of whom are residents with disabilities. The Committee reports to Council on accessibility issues faced by people with disabilities.

Appendix A – Strategies for Potential Future Implementation

The following suggestions and comments were received during the engagement for the Multi-Year Accessibility Plan. They are not included in the planned strategies for 2023 to 2025 due to budget or program constraints. It is valuable to maintain a record of them as they do represent strategies for improving access that may be considered for future implementation:

- Developing free therapeutic recreation programming/opportunities for those with disabilities and partnering those programs with information sharing for other relevant service programs.
- Increasing service levels for the snow plowing and removal of sidewalks and active transportation infrastructure.
- Providing free access to assistive devices such as wheelchairs or braces.
- Offering free parking in accessible parking spaces.
- Creation of safe public spaces for persons experiencing altered consciousness (i.e., narcolepsy, epilepsy) to rest and safely store their belongings.
- Improving accessible beach access within the Kingston waterfront.
- Providing conventional transit service in addition to specialized (accessible) transit service currently provided on-site at Providence Care Hospital.



Two Canes Community Feedback Report: City of Kingston Draft Accessibility Plan

Alternate formats of this report are available upon request.

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Introduction

Throughout July and August 2022, Two Canes Consulting launched an initiative to assist the City of Kingston with gathering community feedback on their draft 2023-2025 Multi-Year Accessibility Plan. Participants were asked to review two documents:

- Appendix A: draft Accessibility Plan
- Appendix B: Two Canes document outlining the five categories of accessibility barriers recognized by the Government of Ontario and four guiding questions for feedback on the Plan

Feedback was collected in the following ways between July 18 and August 29:

- Facebook comments and Direct Messages
- Emails
- Phone calls
- A 1.5 hour virtual focus group on August 22

Additional options for participation were provided, but not utilized (i.e. mail, video and audio recordings, text messages). A total of 12 participants provided in-depth feedback as part of this process, representing a wide range of disabilities, lived experiences, and roles supporting the disability community, personally and professionally.

Questions for Feedback



QUESTION 1: What does accessibility mean to you? What does an accessible City of Kingston look like? This question is meant to generate some high-level language and thoughts around accessibility, rather than specific examples.

QUESTION 2: What is one accessibility barrier that you or somebody you know has experienced within City-operated spaces, programs, and services? This includes, but is not limited to, City Hall, recreational facilities, community museums and art programs, greenspaces, infrastructure, public transportation, and events. Please share your experience in the level of detail you are comfortable with. You may address more than one barrier.

QUESTION 3: What improvements or solutions would best address the barrier(s) you or somebody you know has faced within City of Kingston programs, services, and facilities? You may outline solutions you've seen implemented elsewhere or that you have personally experienced to improve accessibility.

QUESTION 4: Reviewing the draft Accessibility plan, please share your thoughts and suggestions for the following:

Does the Plan use inclusive language and framing of disability issues?

Are there any categories or topics missing from the Plan, that you would like to see included?

Feedback Overview

The experiences shared throughout the Two Canes feedback process overlapped with and built onto the goals outlined in the City of Kingston draft Multi-Year Accessibility Plan. It has been interesting to note recurring themes, particularly around customer service training and the provision of accommodations. In alignment with the draft Accessibility Plan, feedback received from community members is categorized under the five standards of the Accessibility for Ontarians with Disabilities Act (AODA): Customer Service, Information and Communication, Employment, Transportation, and Design of Public Spaces. The final section of this report is entitled Additional Two Canes Suggestions. While these aren't tied to the AODA, they provide tangible measures the City of Kingston can take to further disability inclusion and accessibility, beyond basic compliance.

Customer Service

Attitudinal barriers were highlighted as prevalent among community members, particularly around providing accommodation to attendees of City-operated events, spaces, and transportation. A few key points addressed:



Providing Accommodations

At Kingston museums, galleries, and performances, American Sign Language (ASL) Interpretation currently isn't offered in many circumstances without request. In some cases, these requests are denied, or not fulfilled in time to properly advertise ASL Interpretation availability to the larger community. Customer service representatives and event planners are often unaware of the proper process for providing ASL Interpretation, and it is Deaf community members that take on the logistical and financial burden of facilitating these arrangements. Some specific examples provided:

- Kingston Penitentiary Tours – ASL Interpretation is advertised on the website, however, is not always available. In one instance, the solution provided was to allow the ASL Interpreter free admission, not considering the value and cost of Interpretation services or additional financial burden for the Deaf visitor.
- City Meetings and Events – Requests always need to be made for Interpreters and are never guaranteed as part of standard planning.
- Kingston Grand Theatre - There are often special arrangements that need to be made in advance of performances with specific theatre groups for Sign Language Interpretation. If left until the last minute, these arrangements can't be made or advertised to the wider community. Whereas the current approach is to provide accommodation for a single attendee, a more proactive approach may draw interest from Deaf individuals within and outside of the immediate Kingston area.

Customer Service Training

A few participants recalled barriers faced when entering and navigating through local shops, businesses, and streets, often citing inadequate customer service training. While these instances aren't specific to the City of Kingston, they highlight an overall need for increased training among staff of local downtown businesses. Some specific examples provided:

- Despite calling ahead to ask a restaurant about whether their space is wheelchair accessible and being told it was, a participant arrived to find a step to enter the restaurant and restrooms on another level
- Many businesses utilize StopGap Ramps within the City of Kingston. However, these ramps are often kept inside and are only available upon request, requiring a patron to approach or enter the front door to make the request. It was noted that this barrier is most prevalent among shops along Brock Street. The key concern here is the assumption that patrons requiring the ramp will be travelling with another individual who will be able to first enter the shop and make the request for them
- The City of Kingston recently hosted a walking tour of Wright Crescent to discuss the rezoning of the street to build apartment buildings. Many residents of the Kinsmen apartments on Wright Crescent were unable to complete the walk due to mobility challenges and use of assistive devices. Two Canes received feedback from community members that they felt accessibility wasn't considered in the planning of this event and the appropriate people weren't consulted



Exhibit B to Report Number MAAC-22-012

- One participant noted that they would like to become more involved with the arts community and attend shows and performances, however they are often cost-prohibitive. While this isn't directly disability related, it is important to note the additional costs many people with disabilities incur, in addition high unemployment rates

Suggested Solutions

- There is a universally high demand for ASL Interpretation and shortage of professionals in this field. For this reason, the best approach is not always to preemptively arrange for ASL Interpretation, without knowing if it will be required. City-run events, programs, and venues should develop and follow consistent protocol that ensures the appropriate steps are taken, within a time-sensitive manner to provide ASL Interpretation services. Despite the shortages it is suggested that the City does their due diligence to secure an interpreter and provide sound reasoning if this cannot be accomplished. Additionally, providing captioning services wherever applicable, although not the perfect solution for everyone, will provide a more equitable experience for many.
- Engaging downtown businesses in training opportunities related to customer service for patrons with disabilities is one way to promote consistency between establishments in: a) understanding features of a space that make it accessible or inaccessible, and b) communicating with patrons with a diverse range of needs and what their rights to accommodation are.
- Working with the arts community, performance groups, and venues to create opportunities for community engagement and participation at a lower cost. For instance, where possible, opening dress rehearsals and relaxed performances to an audience at a lower cost than a traditional performance.

Information and Communications

Feedback under this category was a bit broader, touching on key themes of internet access, technological literacy, and the provision of information in alternate formats.

Internet Connectivity and Digital Access

- Access to reliable and affordable internet is a challenge for many residents living in more rural areas of Kingston and just outside of City boundaries. This is important to consider as accessibility solutions are implemented. If solutions rely heavily on access to technology and reliable internet, folks living in these areas may be facing additional barriers.
 - Also important to consider is the wide range of technological literacy among Kingston residents, Solutions such as scannable QR codes to direct people to additional information must be applied in a consistent manner, and without the assumption that this approach is widely understood and recognized



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- Many residents with access to technology and reliable internet prefer to complete shopping and other transactions online, so it is important to ensure that these options are made available and implemented with digital accessibility in mind.
 - Example: Registration or application forms that can be filled out online should be compatible with screen reader and magnification software, navigable using keyboard only, have adequate contrast, etc.
- One participant, who is knowledgeable on web accessibility, addressed the goal outlined in the draft Plan to launch a new City website with a more accessible format. They wondered what this means, if it is a reference with compliance with Web Content Accessibility Guidelines or additional focus on User Experience (UX)
- A few participants noted that display screens on parking meters throughout the city do not have high enough contrast for easy visibility and there is no alternate method provided for some of these meters

Suggested Solutions

- Providing options to access information in non-digital formats and attend virtual or hybrid meetings by calling in, where applicable
- Ensuring alternate formats of information are made available, and that the process to request alternate formats is clear. If there is a situation where an alternate format cannot be provided (i.e. a highly complex map that can't be converted to text-only without losing key information), the reason why the request cannot be fulfilled must be provided.
- In museums and venues where QR codes are used to connect visitors with digital content such as menus, websites, information panels, etc., it is important to create clear guidelines for consistent implementation and educate the public on how to access these codes. Additionally, mobile device lending programs would eliminate barriers to affordability and technological access
- Providing open captions as part of Movie in the Park screenings during summer months
 - While some viewers may find open captions distracting, Two Canes recommends having them available as they provide access to viewers who are Deaf and hard of hearing, while also improving the experience for many others. Recent research has found that, despite previous understanding, open captions may improve the experience for neurodiverse viewers as well, by providing more focusable content.

Employment

This standard wasn't discussed in-depth as none of the participants are actively employed with the City of Kingston. However, Two Canes did receive some feedback from a participant that was interviewed for a role with the City within the last year, citing a negative experience as a person with a disability, and as a candidate overall. They shared that, despite self-identifying as being disabled, they did not receive any follow up



communication regarding accommodations when selected for an interview. They also did not receive any indication during the interview on when they would hear back and what next steps would be, and ultimately did not receive any follow up to let them know they hadn't been selected.

Suggested Solutions

Employers must make their workplace and employment practices accessible to potential or current employees with disabilities. This builds on the Ontario Human Rights Code (OHRC) requirement to provide employee accommodation to the point of undue hardship. Some recommendations related specifically to retention and recruitment include:

- Informing candidates that accessibility accommodations are available on request for interviews when reaching out to schedule
- Using each touchpoint with candidates as an opportunity to highlight the availability of accommodations at various stages of recruitment and onboarding
- Giving candidates as much detail as possible regarding the layout, process, and timeline for interviews and the recruitment process. If possible, also providing the interview questions ahead of time
- When offering a job to a successful applicant, inform them of your organization's policies on accommodating employees with disabilities

Transportation

Two Canes received a mix of positive and negative feedback regarding accessibility of City-Operated transportation services. This feedback focused on awareness and training of operators, availability of information, and alternative options available.

Conventional Transportation

- Participants that utilize accessibility features such as ramps to board and depart public buses are unsure whether these features are available on all vehicles and never felt the process for requesting these features was explicitly explained to them or made public available
- There was a wide range of feedback on customer service experiences with bus operators. While some are accommodating and seem to have a general awareness of accessibility, others do not:
 - Example: With mask wearing throughout Covid-19, some participants had a hard time hearing and communicating with the bus operator and weren't provided with alternate means of communication
- Feedback was provided suggesting that inclusive language and specific communication strategies for people with varying needs including vision loss seems to be lacking
 - Example: When self-identifying as having vision loss or using a white cane, riders noted that bus operators were unsure of how best to assist and provide instruction on completing tasks such as paying fare

Accessible Transportation

- Although one participant has found the Kingston Access Bus to be helpful, they shared that the customer guidelines they were required to read through when registering were quite lengthy, which they felt might be a barrier or deterrent for many riders
- Another participant noted an instance where a Kingston Transit Bus would be able to pick them up before the Kingston Access Bus would reach them. However, being a Kingston Access Bus user, they had only those passes on hand, which were not accepted on the Kingston Transit bus
- Concerns were communicated regarding the and limits of Kingston Access Bus i.e. people live too far away to access it
- One participant shared that sometimes audio announcements stop working on Kingston Transit Buses, and a rider with vision loss may not be able to reliably count on this feature being available
- A participant that has taken the Wolfe Island Ferry by foot noted that an audio announcement was made over the sound system, which they were unable to hear clearly. The information was not displayed anywhere else on the Ferry
- There are several streets throughout Kingston that do not have sidewalks, and several bus routes that run along these streets. Lack of sidewalks and safe walking pathways may deter many people with disabilities from using public transit, particularly during winter months or in poor weather conditions.

Suggested Solutions

- Ensuring that transit operators participate in ongoing training opportunities to ensure that they are following best practice when communicating with riders, fulfilling accommodation requests, and navigating unforeseen circumstances (i.e. audio announcements that aren't working)
- Expanding Kingston Access Bus routes to areas of convenience and where riders are likely to access essential services (i.e. medical offices, pharmacies, grocery stores)
 - Understanding resource limitations, another option may be to continue leveraging partnerships with local taxi and transportation companies to address some of these gaps in service areas
- In cases such as the Wolfe Island Ferry, where announcements are made verbally, strategically placed QR codes may provide riders with the same information on the City of Kingston website, as well as accessible signage directly on the ferry

Design of Public Spaces

Similar to the City of Kingston's own public engagement process, a large proportion of barriers identified by participants are public and architectural in nature. These barriers



are often further exacerbated by attitudinal barriers and build on many of the issues under the Customer Service category. Some specific examples shared include:

Accessible Seating

- Attending the Grand Theatre with a disability and/or assistive device such as a mobility scooter or wheelchair often limits patrons to sitting in one specific area of the audience, towards the back of the theatre.
- There are limited seating options throughout City-operated parks and greenspaces, as well as downtown on streets with high foot traffic, which makes it challenging for many people to take rest breaks as needed

Footpaths and Navigation

- A participant noted that construction projects, including one that was underway at Wright and Palace Road, create additional obstacles for pedestrians and vehicles, and sometimes damage pedestrian pathways, proving especially dangerous for people with mobility challenges and varying degrees of vision loss
- Accessible signage and wayfinding was identified by participants as a concern. One participant mentioned that it is difficult to find an accessible and comprehensive map of downtown Kingston online or in any digital format
- Lots of improvements have been made for audio and accessible crosswalks downtown. However, these features are lacking outside of downtown areas
- Navigating sidewalks downtown, particularly on streets such as Princess Street, Brock Street, and Ontario Street is cumbersome due to signage, patios, garbage cans, planters, etc. blocking the footpath. This presents barriers for pedestrians with visual disabilities, mobility challenges, and those who are Deaf or hard of hearing.
 - One participant noted that the Bagot Street and Princess Street area is where they run errands and complete their shopping, as Bulk Barn, a pharmacy, medical clinic, and Dollar Store are conveniently located within close proximity to public transit. They identified that they and others they know with various disabilities and lower income, or no access to a vehicle, frequent this area for its convenience and affordable options. However, the sidewalks are not always easy to navigate due to previously mentioned obstacles
- Many park benches are in direct sunlight without shelter, so sitting isn't always a comfortable experience, further limiting options for pedestrians
- Participants of the focus group agreed that there is often focus on challenges many face while navigating upwards (i.e. using a ramp instead of stairs). However, sometimes it is traveling down hills and ramps that is challenging

Lighting

There was a great deal of discussion around lighting during the focus group. Participants agreed that a few outdoor areas are not well lit enough for people with



visual disabilities and can lead to diminished perceptions of personal safety among many pedestrians at night. The following locations were identified as being dimly lit:

- Various underground parking garages downtown
- The stretch of City Park in front of the Courthouse (one participant offered their experience as a driver, concerned they might not see a pedestrian due to lack of sidewalks)
- Outside of Kingston General Hospital, along the waterfront
 - One participant shared that they once had a security guard walk with them down the ramp and over into the parking lot as they were: a) concerned for their safety as a woman late at night, and b) experience mobility challenges navigating steep inclines while using a walker

Accessible Restrooms

- Participants discussed the restrooms in City Hall and that although they are centrally located, they cannot be accessed at certain hours and are also dimly lit with poor overall contrast, making them an inaccessible option
- Although the city does not have control over private establishments it is important to note that there are very few accessible washrooms in restaurants downtown. There are a handful of restaurants that identify their restrooms as accessible, even though they are not

Accessible Parking

- A few participants noted that there aren't many accessible on-street and off-street parking spaces downtown. It was noted that there often aren't many visibly disabled people downtown Kingston, and this is because there aren't enough parking spots to accommodate them.
 - Example: One participant provided a specific instance of visiting Marc Raymond Optician on King St E, and not being able to find an accessible parking space close by
 - Please note, Two Canes acknowledges the City's use of the HonkMobile App to highlight off-street accessible parking spaces in the Suggested Solutions outlined below, and how the information on that app can be made available to more residents

Suggested Solutions

- Evaluate seating options available in public spaces such as parks and greenspaces, City sidewalks, and City-operated buildings to identify areas of improvement and expansion
- In museums, theatres, and galleries, consider making [cane seats](#) available for visitors as both a navigational tool and seating option when waiting in lines and traveling throughout the venue



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- Conducting an audit of lighting in high-traffic and essential areas (i.e. outside of KGH)
- Adding audio alerts and tactile walking surface indicators at crosswalks to more intersections outside of the downtown core
- Making information about public washrooms and parking spaces throughout the City of Kingston more widely available and easy to find (i.e. more prominent links on the City website, Visitor Information Website, etc.)
 - Although there is a [map of public restrooms](#), it would be helpful to indicate which of these restrooms are accessible. Another measure to take for overall inclusivity would be to identify all-gender restrooms as well. Additionally, best practice would be for any museums, galleries, or venues that do not have restrooms or accessible restrooms to indicate this on their website. And, where possible, identify the location of the closest accessible restroom and any relevant details (hours of operation, directions on how to get there)

Additional Two Canes Observations

Awards and Recognition

The topic of awarding and recognizing the work being done by disability advocates came up during the focus group. It was identified by one participant that there is an existing award given out by the City of Kingston - the Celebrating Accessibility Award. Their perception of this award among the focus group is that it is often given to initiatives led by non-disabled folks that work to support and help the disability community. This generated further discussion around the narrative that people with disabilities require charity and are on the receiving end of these efforts, rather than leading them. One suggestion made was that there may be some additional criteria for these awards that preference is given to people with lived experience with disability. The City of Kingston is fortunate to have a large network of disability advocates, and this award is a great way to acknowledge the work they are doing.

** Please note, Two Canes did review previous recipients of this award after receiving this feedback and noted that a number of them are disabled or have lived experience with disability.

Disability Awareness Campaigns

The idea of launching City-wide disability awareness campaigns seemed appealing to feedback participants. These could be campaigns directed at local business or the public, through social media posts, accessible signage and advertisements (print and radio). A few potential themes were explored:

- **Prevalence of Disability** – It is part of the human experience and the largest equity-deserving group that everybody will be part of at some point in their lives.



Community members that aren't disabled themselves often have family members that are.

- Globally, people with disabilities make up the largest equity-deserving group with over 1 billion people.
 - In Ontario, approximately 2.6 million people - roughly one in four Ontarians have a disability. As the population ages, this number is expected to grow.
 - We will all experience disability at some point in our lives.
- **Permanent, Temporary, Situational Disability** – Disability can be broken down into three categories: Permanent, Temporary, and Situational. The first two categories reflect a combination of personal and environmental factors, while Situational refers to environmental barriers that impact everybody to some degree. The three are outlined below as they relate to why an individual might benefit from a captioned movie screening.
 - Permanent- A disability that is considered long-term or permanent, may fluctuate or require different levels of accommodation at different times, but is not expected to go away with time.
Example: Being deaf or hard of hearing.
 - Temporary - A disability that is considered short-term or temporary, and any accommodation an individual requires is not expected to be needed in the future.
Example: Temporarily reduced hearing due to ear infection or illness.
 - Situational - This does not fit within the holistic notion of disability, rather is strictly the result of environmental factors that impact everybody. People with permanent and temporary disabilities may be negatively impacted to a greater extent, depending on the barrier.
Example: excessive background noise and distractions.
 - **Non-Visible or Hidden Disabilities** – Most disabilities are hidden or non-visible, which is why it is important to establish inclusive practices for serving all people, regardless of whether a disability is readily apparent.

Collaborative Partnerships and Working Groups

During the focus group, there was discussion around the shared accessibility challenges between the City and other major employers in Kingston, such as Queen's University. It was acknowledged that different organizations, and even departments within those organizations, are working in silos to find solutions.

The group seemed interested in the idea of collaborative working groups between organizations, led by people with lived experience with disability, to develop accessibility solutions and determine how best to implement them across all organizations and throughout the City.



With two post-secondary institutions within Kingston, the City has access to expertise, research, and creativity to create ongoing solutions for accessibility. One example that is currently under development is a partnership between Murney Tower Museum (not City-operated) and the Queen's Engineering Department. As part of a project Two Canes is completing for the Museum, a design contest is being developed that would require Queen's Engineering students to develop a tactile replica of a key feature of the museum. This contributes to a multi-sensory experience for all interested visitors, while also providing blind and visually impaired visitors with another means to perceive and engage with certain components of the museum.

Summary of Findings

The Two Canes feedback process, which spanned over the course of five weeks, garnered positive attention and high levels of online engagement among Kingston Community members. While nearly twenty people explicitly indicated the intent to participate, we ended up receiving feedback from twelve in total. The majority of which were white women. Although this group represented a wide range of ages and needs, it is worth noting the lack of representation across gender and race, and how a lack of intersectionality will impact the general findings of this feedback process. The time of year may have been a barrier to participation, with people away on vacation and spending less time engaging online over the summer. However, Two Canes appreciates the detail and quality of feedback received. The findings are explored more in-depth throughout the report, along with suggested solutions. Overall suggestions are summarized as follows:

1. The City of Kingston is encouraged to consider the diverse range of technological access and literacy among residents when implementing technology-based accessibility solutions and features. Technology has the potential to bring important information to a wider audience in a more inclusive manner, if implemented correctly. However, it is important to provide alternative means to accessing information that doesn't rely on technology access.
2. The City of Kingston is encouraged to continue seeking out accessibility consulting and training opportunities led by disabled experts and advocates. A few key topics identified include:
 - Accessible event planning and facilitation
 - Sign language-specific training
 - AODA Customer Service Standard training
3. As previously stated, Two Canes appreciates that the City of Kingston does not have control over decisions made by private businesses. However, we believe the City is positioned to guide and influence local businesses through the following;



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- Targeted bursaries and grants to small businesses that focus on accessibility. Or highlighting things like digital accessibility when promoting funding focused on digital growth and adoption
- Incentives that support inclusion and accessibility (i.e. a promotional campaign that highlights local businesses that are actively promoting increased inclusion and accessibility within their spaces, for both employees and customers)