

2024-2027 Accessibility Plan



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General

Executive Summary

Transit Windsor's Accessibility Plan outlines a commitment to providing barrier-free public transportation for all residents. With a focus on dignity and equal opportunity, the plan encompasses various aspects including employment, built environment, Information and Communications Technology (ICT), communications, procurement, program delivery, transportation, training, and consultations. Ensuring compliance with relevant legislation and standards, Transit Windsor continuously strives for improvement through stakeholder engagement and feedback mechanisms. Key highlights include accessible terminals and buses, comprehensive employee training, and transparent consultation processes. By prioritizing inclusivity and accessibility, Transit Windsor aims to create a safe, reliable, and welcoming transit experience for all passengers, irrespective of their abilities.

Contact Information

Members of the public, associations representing the interests of persons with disabilities, and employees of Transit Windsor are encouraged to provide feedback on the accessibility plan, accessibility progress report and/or feedback process as well as to request alternate formats of these documents, as desired by contacting:

311 Windsor City Services
311@citywindsor.ca

Transit Windsor may also be contacted through its website, social media platforms, toll free number, in person, or by ground mail.

- Local Number: **311** in Windsor or **519-255-CITY(2489)**
- Mailing address:
Transit Windsor
3700 North Service Road East
Windsor, Ontario
N8W 5X2

Transit Windsor shall provide any information relating to its accessibility plan, accessibility progress report and/or feedback process of its Accessibility Progress Report in alternate formats, upon request. Requests for documentation in braille or audio format must be fulfilled within 45 days of the request. All requests for other alternate formats (large print, physical copy) must be fulfilled within 15 days of a request being made.

Mission Statement

Our mission is providing safe, reliable, and affordable public transit for the community through continuous improvement in customer care, environmental stewardship, and employee excellence.

Operating Environment

Transit Windsor provides conventional public transportation, exclusively by bus, and serves the City of Windsor in addition to LaSalle, Essex, Kingsville, Amherstburg, and Leamington as well as a cross-border service connecting downtown Windsor and downtown Detroit. Serving more than nine million passengers per year, Transit Windsor operates a fleet of 119 buses operating on 20 surface routes. Windsor has a primary terminal located in downtown Windsor and smaller terminals throughout the city. Transit Windsor's service area covers over 300 km² and has a service area population of over 300,000. Since 2020, all Transit Windsor routes and busses are accessible.

Specialized transportation for persons with disabilities is provided by Handi-Transit, a non-profit organization contracted by the City of Windsor. Handi-Transit is not owned and /or operated by Transit Windsor. As a provincially regulated entity, Handi-Transit is not subject to federal accessibility laws.

Legislation

The *Accessible Canada Act* came into force in July 2019, with an overarching goal of realizing a barrier-free Canada by 2040. Following the coming into force of the *Accessible Canada Act*, the Canadian Transportation Agency (CTA) published two sets of regulations: the *Accessible Transportation for Persons with Disabilities Regulations* (ATPDR), and the *Accessible Transportation Planning and Reporting Regulations* (ATPRR), which may apply to Transit Windsor. Employment and Social Development Canada (ESDC) also released the *Accessible Canada Regulations* (ACR) with direct application to Transit Windsor's corporate, organizational, and employment practices.

Accessibility Statement

Transit Windsor is dedicated to providing every passenger with a barrier-free experience that ensures every resident, regardless of their abilities, have the same opportunity to travel comfortably and safely on every bus.

Accessibility Plan Principles

The objective of this accessibility plan is to outline the policies, programs, practices, and services that Transit Windsor has employed and will employ to meet the requirements of the ATPRR and the ACR, the principles of which are that:

- All persons must be treated with dignity regardless of their disabilities.
- All persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities.
- All persons must have barrier-free access to full and equal participation in society, regardless of their disabilities.
- All persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities.
- Laws, policies, programs, services, and structures must consider the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons; and,
- Persons with disabilities must be involved in the development and design of laws, policies, programs, services, and structures.

The Accessibility Plan provides an overview of the organization's existing policies, programs, practices, and services, as well as action plans for 2023/24 to 2025/26. The action plans are divided into several activity areas as stated in the ATPRR, and ACR notably:

- Employment.
- Information and Communications Technology (ICT).
- Communications, other than ICT.
- Procurement of goods, services, and facilities.
- Design and delivery of programs and services.
- Transportation; and
- Built environment.

The Accessibility Plan must be updated at least every three years with progress reports published every year between complete updates. Transit Windsor engages with multiple stakeholder groups with the aim of making certain that its policies, programs, practices, and services are effective and aligned with our accessibility strategy.

Feedback

Transit Windsor welcomes ongoing feedback on its Accessibility Plan, and the implementation of its action items. Members of the public may provide feedback and offer input on:

- The contents of the Accessibility Plan.
- How the accessibility plan is being implemented.
- The barriers encountered by persons with disabilities that use our services.
- Proposals for new ways of improving on our service and accessibility.
- Ensuring accountability and transparency in our planning, the commitment to improve accessibility, and the implementation of the plan.

Feedback can be submitted by mail, telephone, e-mail (accessibility@citywindsor.ca), in person, and any other means used to communicate with the public with acknowledgement of receipt. Feedback can also be provided anonymously if requested. The information and comments gathered from complaints offers invaluable lessons in better understanding how persons with disabilities are treated, the full spectrum of their lived experience, and how this informs policy and practice. In reporting on our progress, feedback plays a crucial role in identifying barriers and how those barriers are removed.

Provisions of CTA Accessibility-Related Regulations

As a small, regulated bus transportation service provider, operating exclusively in Windsor-Essex, Ontario with a single bus service to Detroit in the United States, Transit Windsor is subject to the Accessible Canada Regulations. Based on our interpretation, Transit Windsor is not subject to the ATPRD or Part VII of the Air Transportation Regulations (ATR) but is subject to the Personnel Training for the Assistance of Persons with Disabilities Regulations (PTR). As a result, this plan is based on the expectation that it is further bound by the applicable provisions under the ATPRR. Information on the activities and services covered by these sections is presented in the following sections.

Areas Described Under Section 5 of the ACA

Employment

Prospective and current employees at Transit Windsor should be able to enjoy a fulfilling and rewarding career regardless of their abilities and removing barriers to employment is a key priority. We are focused on the continued development of a systematic and documented approach to addressing accessibility in the workplace through the employment life cycle from recruitment and onboarding to separation and retirement.

Existing Employment Policies, Procedures, and Practices

- Policies and procedures including, but not limited to, a range of accessibility policies governing communications, assistive devices, support persons, human rights, respectful workplace, and accessible job descriptions.
- Employees receive required training during onboarding including AODA compliance training related to their roles such as customer service.

- All employment, procedures, and practices are reviewed through a diversity, inclusion, and accessibility lens and our Diversity and Inclusion Initiative (2018) requires ongoing reviews of existing practices.
- Ensuring all online resources and employment information are accessible.
- Accommodations provided as requested during the recruitment process.

Projected Employment Policies, Procedures, and Practices

- Training priorities related to accessibility and diversity are being developed and training providers selected to deliver both digital on demand and in-person courses.
- Refinement of language used in recruitment and selection processes and job descriptions.
- Purchasing of accessibility equipment for testing and interviews as required
- Reviewing of recruitment, development, and retention practices to ensure barriers to employment are identified and addressed.
- Build upon success of past placements with agencies assisting individuals with disabilities to further expand placement opportunities.

Built Environment

The built environment at Transit Windsor is composed of the Windsor International Transit Terminal (WITT), Transit Centre (TC) sheltered and non-sheltered bus stops, smaller terminal facilities throughout the city, and all buses. Physical locations are composed of both interior and exterior elements that must all be accessible.

Existing Accessibility Features of the Built Environment

All major transit terminals are fully accessible (Windsor International Transit Terminal, Tecumseh Mall, St. Clair College, Devonshire Mall, HDGH Terminal, Vollmer Centre). The main floor of the Transit Centre is fully accessible. A new ramp was installed at the Transit Centre in 2019.

Existing Accessibility Features on Transit Windsor Buses

- All buses are low floor.
- All buses have ramps.
- All buses can kneel (front of bus drops to reduce step-in height)
- All buses are equipped with two mobility-device berths with tie-down straps.
- All buses are equipped with priority/courtesy seating areas.
- All buses are equipped with audible and visual stop announcements, along with automated detour announcements

Projected Accessibility Enhancements to the Built Environment

Transit Windsor constantly monitors the accessibility of its built environment, which is provided by the City of Windsor. As budgets allow, landing pads as well as other active transportation features are added.

Information and Communications Technology (ICT)

The inclusion of accessibility in the deployment of digital communications remains a priority at Transit Windsor. In keeping with the principle that every passenger should be treated with dignity; we strive to make all communications available in different forms and accessible to residents regardless of their ability. From adaptive technologies to public announcement systems, persons with disabilities rely on the same information as every other resident to finding information needed to travel safely. The following existing and projected changes serve to address realized and potential barriers.

Existing Accessibility Features and Projects Related to ICT

- Transit Windsor digital content is hosted on the City of Windsor which is required to be WCAG 2.0 Level AA Compliant. Last compliance reported in December 2023
- Continuous testing of digital content has been conducted using NVDA and JAWS screen readers.
- Transit schedules are published as PDFs and remediated to PDF/UA compliant.

Future and Long-term Accessibility Features and Projects Related to ICT

The City of Windsor is currently examining new ways of conveying schedule information without PDFs. Migrating to WCAG compliant web content will make schedules more accessible while reducing the associated overhead of document remediation.

Communications, other than ICT

Communications for persons with disabilities extends beyond the digital dimension to including everything from braille and the use of plain language, large print, telephone services, print and digital displays. Transit Windsor is dedicated to identifying barriers for persons with disabilities and to providing alternative means of communication. Every passenger should be able to find information quickly and effectively regardless of their ability.

Existing Non-ICT Features

- Visual stop screens at all major terminals displaying real-time bus arrival information.
- Info-posts at some stop locations, and in shelters. System maps in all shelters

Planned and Long-Term Non-ICT Features

Conduct a study of current practices of transportation providers to determine what measures can be adopted at Transit Windsor

Procurement of Goods, Services, And Facilities

The procurement process for the City of Windsor prioritizes accessibility in alignment with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its regulations. Here's an overview:

Accessibility Commitment: The City of Windsor pledges equal treatment for individuals with disabilities concerning city services, programs, and goods, ensuring dignity and equity. All suppliers, contractors, and manufacturers engaging with the city must comply with AODA and its regulations.

Accessible Procurement: Accessibility criteria are integrated into the procurement process. Suppliers are encouraged to identify features of their products or services meeting relevant standards. Specific accessibility requirements are clearly stated in procurement documents and given due consideration throughout the process.

Accessible Customer Service Standard: Third-party contractors dealing with the public on behalf of the city must conform to the Accessibility Standards for Customer Service. Requirements include employee training on serving persons with disabilities and maintaining training records, which should be available upon request.

Further Resources: More information on the Standards for Customer Service and training resources for contractors can be found on the City of Windsor website under the Accessibility link.

These practices are reinforced by the Purchasing Bylaw, which outlines procurement regulations and standards. The City's commitment to accessibility extends to all aspects of its operations, ensuring inclusivity and compliance with legal mandates.

In addition to integrating accessibility criteria into the general procurement process, the City of Windsor ensures that such criteria are also incorporated into all Requests for Proposals (RFPs) and other solicitations whenever necessary. This practice underscores the city's commitment to accessibility, ensuring that all vendors and contractors engaging with the city are held to the highest standards of inclusivity and compliance with accessibility regulations.

Existing Accessibility Requirements related to Procurement of goods, services, and Facilities.

The City of Windsor is committed to providing equal treatment to people with disabilities with respect to the use and benefit of City services, programs, and goods in a manner that respects their dignity and that is equitable in relation to the broader public. All bidders, Suppliers and Contractors who provide goods, services or construction to the City shall comply with the Accessibility for Ontarians with Disabilities Act, 2005, and all Regulations emanating therefrom.

Accessible Procurement

Accessibility criteria will be considered throughout the procurement process. Suppliers, contractors, and manufacturers should identify features of their product or services which meet the relevant standards. Link to Integrated Accessibility Standards: http://www.e-laws.gov.on.ca/html/source/regs/english/2011/elaws_src_regs_r11191_e.htm

Where specific accessibility requirements are identified, they will be clearly stated in the procurement document and will be given appropriate consideration throughout the procurement process.

Accessible Customer Service Standard

Effective 1 January 2010, third party Contractors who deal with the public or other third parties on behalf of the City, as well as contractors who participate in developing City policies, practices or procedures governing the provision of goods and services to members of the public or other third parties, must conform with the Accessibility Standards for Customer Service, O. Reg. 429/07 under the Accessibility for Ontarians with Disabilities Act 2005("AODA").

Contractors shall ensure:

- 1) Their employees are trained on serving persons with disabilities as outlined under the Standards for Customer Service
- 2) Training records are maintained, including dates when training is provided, the number of employees who received training and individual training records.
This information will be made available, if requested by the city.

Further information on the Standards for Customer Service including training resources for contractors and the City of Windsor Accessible Customer Service Policy can be found under the Accessibility link on the City of Windsor website www.citywindsor.ca

Planned and Long-Term Requirements related to Procurement of goods, services, and Facilities.

In addition to integrating accessibility criteria into the general procurement process, Transit Windsor will be exploring the application of a Diversity and Accessibility lens to all policies including procurement. Though still in the conceptual stage, examining procurement through the perspective of inclusion and a litmus test involving the identification of any barriers that would adversely impact persons from marginalized communities.

Design and delivery of programs and services

Transit Windsor operates 119 buses on 20 surface routes that serve over 9 million riders every year. A rider's experience is not only impacted by our facilities and buses but just

as much by our front-line customer support staff and drivers. Every driver understands and is trained on the importance of providing all customers with a safe, comfortable, and enjoyable journey regardless of any physical or sensory impairment. While accessibility has been gradually instilled into our service delivery model, we are always responsive to new approaches and strive to implement best practices in assisting passengers with disabilities.

Existing Accessibility Requirements for Delivery of Programs and Services

Each driver receives extensive training at the time of hire in accessibility awareness and accommodation requirements, as well as customer service training to ensure that all customers, regardless of ability, are treated fairly and equitably. Drivers are trained on the operation of accessibility features of the buses, including the proper securement of mobility devices, and the administration of Priority and Courtesy seating areas of the buses. All Transit Windsor trainers are certified by the Ontario Ministry of Transportation to deliver training as outlined in the provincial Driver Certification Program. In addition, all trainers are certified in the delivery of customer service training through the Professionals in Driver Education program (PRIDE), offered through the Ontario Public Transit Association.

Planned and Long-Term Changes to the Delivery of Programs and Services

Transit Windsor plans to enhance driver training through the purchase and implementation of the Transit Ambassador program, offered through the Canadian Urban Transit Association (CUTA).

Transportation

Our facilities were designed to ensure that every passenger can access our terminal facilities easily and safely. While passengers arrange transportation to our facilities, amenities have been installed to allow passengers to access any terminal regardless of their ability.

Existing Accessibility Features related to Transportation

All major transit terminals are fully accessible (Windsor International Transit Terminal, Tecumseh Mall, St. Clair College, Devonshire Mall, HDGH Terminal, Vollmer Centre). The main floor of the Transit Centre is fully accessible. A new ramp was installed at the Transit Centre in 2019.

Planned and Long-Term Features related to Transportation

Future development of new East-and West-End terminals will incorporate the latest in accessibility features, as per AODA requirements.

Training

Transit Windsor is committed to ensuring employees receive training and skills development in the following areas that are consistent with the regulations under the Personnel Training for the Assistance of Persons with Disabilities Regulations. Training should be at the appropriate level relevant to the role of the employee including:

- Policies, procedures, and regulatory requirements.
- Understanding the range of human disabilities, how to communicate with persons with disabilities, and the roles of employees.
- Assisting with mobility aids through doors, in elevators, on curbs, and surface requiring assistance.
- Transferring a person with a disability between the person's own mobility aid and a mobility aid provided by a carrier and between a mobility aid and the person's passenger seat, including the correct methods gather information and performing lifts, guiding the visually impaired through facilities, assisting persons with difficulties with balance, ability, or coordination.
- Different types of mobility aids.
- Requirements, limitations, and procedures for securing, carrying, and stowing mobility aids in the passenger compartment of a vehicle.
- Proper methods of carrying and stowing mobility aids in the baggage compartment of a vehicle.
- Instruction on telephone devices for persons who are deaf or hard of hearing, signage, audio or video equipment, mechanical lifts, ramps and other level-change devices on-board oxygen, on-board electrical supply, connection of auxiliary respirator systems and installation of stretchers.

Training will be provided within 60 days of the commencement of an employee's duties and refresher training will be provided at suitable intervals in addition to periodic reviews of materials to ensure material is current and accurate.

Consultations

As part of planning for accessibility, Transit Windsor values a public consultation process that is transparent, accessible, accountable, and inclusive of the broad diversity of Windsor. The consultation was open to all residents and stakeholders, and everyone is invited to share their feedback on our three-year accessibility plan.

Consultation Objectives

The consultation period shall/has taken place over the course of one month to allow residents and stakeholders including employees, City of Windsor administration, and groups representing the interests of persons with disabilities sufficient time to review the plan and provide constructive feedback. That process includes:

- Sharing the accessibility plan both internally and externally.
- Received feedback on the content of the plan.
- Raised awareness of the plan both internally and externally.
- Allowed for proposals of new ways it can improve accessibility.

The Accessibility Plan shall be published in a format that meets the requirements for Level AA conformance under the Web Content Accessibility Guidelines 2.1, on Transit Windsor website to communicate with the public, and can be accessed directly on the webpage or through a hyperlink.

Consultation with the General Public

The draft accessibility plan shall be shared on the public website between October 3rd and October 31st, 2022, coupled with a communications plan to improve reach and increase participation. The public had the option to submit feedback on the plan via an online form available on our website, or through any of the following contact mechanisms:

Accessibility Officer (accessibility@citywindsor.ca)

Toll free number: 311 locally

TTY line: Bell Relay Service) Type 711 for the operator or dial 1-800-855-0511.

Mailing Address

Transit Windsor

3700 North Service Road East

Windsor, Ontario, N8W 5X2

Consultation with Groups Representing the Interests of Persons with Disabilities

To maximize the impact of the public consultation process, there has been extensive outreach to groups representing the interests of persons with disabilities for feedback. These groups were directed to the plan on Transit Windsor external website and encouraged to share the information with their members and networks.

Transit Windsor will be providing the accessibility plan for the purposes of consultation with the Windsor Accessibility Advisory Committee, the Infrastructure Working Group, the Transit Windsor Working Group, and select accessibility organizations within the Windsor-Essex Region.

Glossary

Accessibility: The design of products, devices, services, environments, technologies, policies, and rules in a way that allows all people, including people with a variety of disabilities, to access them.

Barrier: Anything that might hinder people with disabilities' full and equal participation. Barriers can be architectural, technological, attitudinal, based on information or communications, or can be the result of a policy or procedure.

Disability: Any impairment, or difference in physical, mental, intellectual, cognitive, learning, or communication ability. Disabilities can be permanent, temporary, or can change over time.