

Agenda

Audit Committee

3rd Meeting of the Audit Committee

September 18, 2024, 12:00 PM

Council Chambers - Please check the City website for additional meeting detail information. Meetings can be viewed via live-streaming on YouTube and the City Website.

The City of London is situated on the traditional lands of the Anishinaabek (AUh-nish-in-ah-bek), Haudenosaunee (Ho-den-no-show-nee), Lūnaapéewak (Len-ah-pay-wuk) and Attawandaron (Add-a-won-da-run).

We honour and respect the history, languages and culture of the diverse Indigenous people who call this territory home. The City of London is currently home to many First Nations, Métis and Inuit today.

As representatives of the people of the City of London, we are grateful to have the opportunity to work and live in this territory.

Members

Councillors E. Pelozza (Chair), P. Cuddy, S. Stevenson, J. Pribil;, I. Cheema

The City of London is committed to making every effort to provide alternate formats and communication supports for meetings upon request. To make a request for specific to this meeting, please contact accessibility@london.ca or 519-661-2489 ext. 2425.

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MEMO TO : City of London – Audit Committee
FROM : MNP LLP
SUBJECT : Briefing Note From Internal Audit
DATE : September 18, 2024

- MNP has completed the HRIS Readiness Assessment. This assessment looked to determine the preparedness for the implementation of the HRIS, including whether project objectives are being met, desired outcomes are on track to be achieved, the efficacy of project management and identification of lessons learned. This audit report will be presented at the Audit Committee meeting scheduled for September 18, 2024.
- MNP has completed the Accessibility Review. The objective of this targeted review was to assess the City’s compliance with the Accessibility for Ontarians with Disabilities Act (AODA), and the standards defined in the Integrated Accessibility Standards Regulation (IASR) in order to provide an overview of gaps in compliance, the associated risks with non-compliance, and recommendations for improvement. This audit report will be presented at the Audit Committee meeting scheduled for September 18, 2024.
- MNP at the end of the fieldwork stage and entering the reporting phase of the Municipal Affordable Housing Development Value for Money audit. Given a critical component of new developments are projects that are directly sponsored by the City, and there is a plan to intensify and reuse underdeveloped properties to add to the City’s affordable housing supply, this audit will review these projects in order to understand root causes for any budget/cost changes, schedule delays, delivery effectiveness, and to better understand “Lessons Learned” from these projects to help guide future affordable housing development projects. MNP is targeting this audit report be presented at the next Audit Committee meeting scheduled for November 13, 2024.
- MNP is in the initial stages of planning for and scoping the compliance audit focused on the programing related to Creating a Safe London for Women and Girls. The overall objective of the review will focus on the City's progress towards the execution of its Creating a Safe London for Women and Girls initiative. An update on the progress of the audit will be provided at the next Audit Committee meeting scheduled for November 13, 2024.

City of London
Audit Committee Meeting
September 18, 2024
Internal Audit Follow Up Activities Dashboard

Internal Audit Follow Up Activities as of August 31, 2024

A strong indicator of an effective internal control environment is the timeliness with which Management addresses reported control deficiencies. On a quarterly basis, MNP will conduct an audit follow-up process to ensure internal audit findings have been effectively remediated through the implementation of related Management action plans on a timely basis.

There were **nine (9)** recommendations from issued audit reports that were followed-up on during this quarter. **One (1)** Management action item was closed, **one (1)** action items were retargeted, and **seven (7)** action items are on track to be completed by their respective due dates.

- **Neighbourhood Decision Making Program Value for Money (“VfM”) Audit** – Two (2) Medium Risk Observations.
- **Recruitment and Selection Audit** – One (1) Medium Risk Observation.
- **Vendor Risk Management Audit** - One (1) High Risk and Four (4) Medium Risk Observations.
- **Cyber Security Review** – One (1) Medium Risk Observation.

Remediation Status Legend



Open Management Action Plans

#	Management Action Plan	Risk Rating	Due Date	Remediation Status	Quarterly Update
Neighbourhood Decision Making Program Value for Money (“VfM”) Audit					
1	<p><u>Tracking the Effectiveness of Implemented Ideas/Projects</u></p> <p>The success of ideas post implementation should be measured, where practical. The frequency, type and nature of analysis can vary depending on the implemented idea.</p> <p>Both qualitative and quantitative analysis should be utilized to help determine if desired outcomes have been accomplished. As an example, to determine the effectiveness of an implemented idea, the City could utilize factors such as:</p> <ul style="list-style-type: none"> • Measuring resident attendance or usage (i.e., for park playgrounds, benches, skate parks, community electric vehicle charging stations, etc.). • Tracking social media engagement (i.e., reviewing hashtags for locations/implemented ideas). • Performing resident surveys to obtain their opinions on the implemented idea. • Measuring community safety metrics (i.e., after installation of streetlights and traffic signs). 	Medium	March 2025	On Track for Completion	Management is on track to complete their action plan by the documented due date, pending the outcome of the 2025 Budget Update process.
2	<p><u>Service Level Agreements (“SLAs”) and Key Performance Indicators (“KPIs”)</u></p> <p>SLAs and related KPIs should be established for key processes of the Program. The development of the SLAs and KPIs should factor in the processing of ideas by type, volume, and frequency to help ensure any service standards created are realistic and represent an accurate reflection on performance.</p> <p>The following are examples of internal and external measures that could be implemented by the NDM Program team:</p> <ul style="list-style-type: none"> • Feasibility Analysis (Internal Measure) <ul style="list-style-type: none"> ○ Average time taken for SMEs or relevant staff to provide idea feasibility notes and conclusion. • Communications with idea submitters (External Measures) <ul style="list-style-type: none"> ○ Average time taken to communicate the idea feasibility result to an idea submitter. ○ Average time taken to communicate the voting results to an idea submitter and next steps for idea implementation. ○ Average time taken to provide status update/progress of implementation to an idea submitter. 	Medium	December 2024 Revised to March 2025	Delayed	This action is on hold pending the outcome of the 2025 Budget Update process.

#	Management Action Plan	Risk Rating	Due Date	Remediation Status	Quarterly Update
	Internal measures should be communicated within the City and external measures should be communicated to residents via the City's website to ensure performance expectations are clear and understood by each party.				
Recruitment and Selection Audit					
1	<u>Sourcing and Attracting Applicants</u> People Services will develop the value proposition for working at the City of London and work with Strategic Communications on how best to promote this within our recruitment processes with full implementation targeted for Q2 2024.	Medium	June 2024	Completed	
Vendor Risk Management Audit					
1	<u>Vendor Due Diligence and Formalization of the Vendor Risk Assessment Process</u> Procurement Services has engaged a consultant to review and advise on adding vendor management tools including risk assessments, Performance evaluations, Performance rectification processes. A consulting project is underway with an estimated update of the Procurement of Goods and Services Policy targeted for June 2024. The degree to which additional due diligence is implemented, will be dependent upon the business case submitted requesting operating funds to take on the additional responsibilities of a full Vendor Performance Program/Office.	High	Original - Q3 2024 Revised - Q1 2025	On Track for Completion	Business Case #P-73 Vendor Performance Management was not adopted as part of the Multi-Year Budget so Administration will look to amend the scope of the procurement of goods and services policy to adjust the policy framework and tools to reflect what can be achieved given current state. Vendor Performance Management tools can be implemented on high-risk, high-visibility and high-value projects, exceeding a pre-determined threshold. This will include project specific performance evaluations, performance report cards, rectification processes and a debarment process.
2	<u>Periodic Performance Evaluation of Vendors</u> Procurement Services has engaged a consultant to review and advise on adding vendor management tools including risk assessments, performance evaluations, performance rectification processes and vendor debarment.	Medium	Original - Q3 2024 Revised - Q1 2025	On Track for Completion	Business Case #P-73 Vendor Performance Management was not adopted as part of the Multi-Year Budget so Administration will look to amend the scope of the procurement of goods and services policy to adjust the policy framework and tools to reflect what can be achieved given current state. Vendor Performance Management tools can be implemented on high-risk, high-

#	Management Action Plan	Risk Rating	Due Date	Remediation Status	Quarterly Update
					visibility and high-value projects, exceeding a pre-determined threshold. This will include project specific performance evaluations, performance report cards, rectification processes and a debarment process.
3	<p><u>Vendor Contract</u> Procurement Services has engaged a consultant to draft a standard City of London Master Contract document. Starting in 2024, for centralized procurements entered into, Procurement will require copies of signed agreements to be provided when complete. Procurement Services will establish the centralized repository to store these contracts along with procurement records.</p>	Medium	Original - Q3 2024 Revised – Q1 2025	On Track for Completion	Business Case #P-73 Vendor Performance Management was not adopted as part of the Multi-Year Budget so Administration will look to amend the scope of the procurement of goods and services policy to adjust the policy framework and tools to reflect what can be achieved given current state.
4	<p><u>Vendor Management Reporting</u> A Vendor Performance Management (VPM) program will need to be implemented and included in new bidding templates. Reporting would begin after the VPM has been implemented for a year.</p>	Medium	Q3 2025	On Track for Completion	Although Business Case #P-73 Vendor Performance Management was not adopted as part of the Multi-Year Budget, Civic Administration is working with a consultant to determine the scale and scope that can be implemented within existing resources.
5	<p><u>Formalization of Key VRM Processes</u> Procurement Services has engaged a consultant to review the City's Procurement of Goods and Services Policy, which will take into consideration vendor management. Approval of the VPM Business Case will affect the degree in which this is undertaken.</p>	Medium	Original - Q3 2024 Revised – Q1 2025	On Track for Completion	Business Case #P-73 Vendor Performance Management was not adopted as part of the Multi-Year Budget. Civic Administration will look to amend the scope of the procurement of goods and services policy to adjust the policy framework and tools to reflect what can be achieved given current state. Vendor Performance Management tools can be implemented on high-risk, high-visibility and high-value projects, exceeding a pre-determined threshold.

#	Management Action Plan	Risk Rating	Due Date	Remediation Status	Quarterly Update
Cyber Security Review					
1	<p><u>Alignment of cyber initiatives</u></p> <p>(a) To support funding for a GRC solution and to ensure all associated documentation connects to the appropriate cyclical activities, ITS will bring forward a business case for consideration through the annual budget update process.</p> <p>(b) Building on the identified ownership and ticketing process of each cyclical activity, ITS will review and update all cyclical activities through the RACI lens and continue to optimize ticketing through a single tool (Information Technology Service Management Application).</p> <p>(c) ITS will review each cyclical activity, determine where additional KPIs can add business value and implement those KPIs.</p> <p>(d) ITS will evaluate and implement Service Level Agreements for cyclical activities were beneficial.</p>	Medium	<p>(a) GRC Tool Funding Business Case</p> <p>(b) Review and Update of Cyclical Activities (June 30, 2024) <i>completed</i></p> <p>(c) Review and Update of Cyclical Activities (June 30, 2024) <i>completed</i></p> <p>(d) Review and Update of Cyclical Activities (September 30, 2024)</p>	On Track	On track for targeted completion.

City of London - Internal Audit

HRIS Readiness Assessment – Recommendations and Roadmap

Final Report – August 14, 2024

Prepared By: Dean Leesui,
Partner, Digital Services
MNP
Email: dean.leesui@mnp.ca

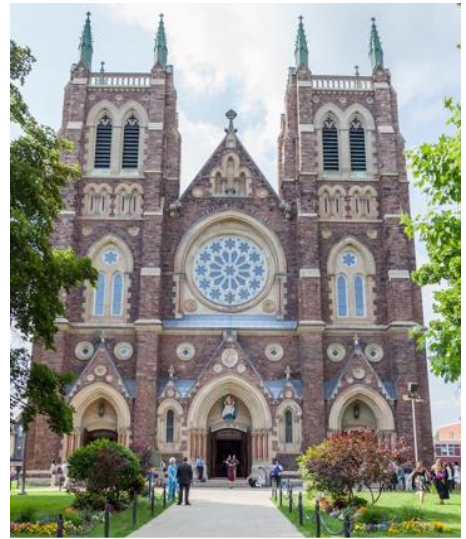


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1.0 BACKGROUND

This report represents the culmination of MNP’s Human Resource Information System (HRIS) readiness assessment for the City of London (the City). The City is upgrading its HRIS in alignment with its goal to become a leader in public service. MNP assessed the organizational readiness for new systems and the ability to implement the right project processes and tools.

The ultimate goal of this report is to summarize the efficacy of project management principles and provide actionable recommendations that ensure or establish rigour as the City moves forward with Phase 2 of the HRIS implementation.

We conducted this assessment using MNP’s human-centred digital transformation framework, focusing on project management practices across three (3) domains; People, Process, and Technology. MNP collaborated with the City of London project leadership across four (4) iterative phases;

- Phase One, ‘Understanding Today’, involved a thorough document review and interviews to establish guiding principles, identify challenges, and assess the current state.
- Phase Two, the ‘Readiness Assessment’, ranked the HRIS project based on factors determining organizational readiness for change and capacity for successful implementation.
- Phase Three, ‘Recommendations and Roadmap’, outlines tactical next steps and an action-priority matrix for the City’s next steps.
- Phase Four, ‘Review and Finalize’, is the concluding version of the document following detailed discussions and collaboration, serving as the final assessment of our HRIS project.

2.0 APPROACH

MNP’s approach to HRIS Readiness Assessments is to incrementally build on findings in a “journey of confidence”, distilling key insights towards recommendations as an exercise in due diligence. The approach is summarized as follows.

Phase 0	Phase 1	Phase 2	Phase 3
Initiation and Planning	Understanding Today	Readiness Assessment	Recommendations and Roadmap
Planning efforts for the HRIS Readiness Assessment.	Understanding Today through a Current State Assessment.	Readiness Assessment through applying a readiness to transform lens to the current state findings.	Determining the Recommendations and Roadmap for activities related to resolving the risks identified during the assessment.

3.0 DETAILED SCOPE OF WORK

For the purpose of this HRIS Readiness Assessment, MNP:

- a) Held meetings with key City of London management to seek input into the details of the HRIS Implementation;
- b) Reviewed ELT and SLT briefing notes;
- c) Reviewed project strategy and communication documents;
- d) Considered People Works change management documentation;
- e) Reviewed the HRIS project's financial analysis of predicted costs;
- f) Reviewed the project's planning, including its current state, reasonableness, and underlying assumptions;
- g) Considered the project's management procedures, including governance, business, and IT change management, from the perspective of effectiveness;
- h) Reviewed the detailed status reports as presented to various governance groups;
- i) Assessed the governance structure of the project; and,
- j) Summarized our observations.

The assessment was not scoped to include an audit of any system related to the HRIS implementation.

4.0 SUMMARY OF OBSERVATIONS

Over the course of the engagement, no high risks were identified. MNP found that resource challenges have been a theme during the HRIS Implementation. This report also intends to highlight that when effective controls are in place, short-term gains from outsourcing and co-sourcing can help rapidly stabilize and develop maturity, capacity, and skill. It is recommended that the City develop organization-wide frameworks for project governance and risk identification, develop and implement modern resourcing models, and adopt an effective change management model.

5.0 CLIENT STATE SUMMARY

Through MNP's readiness assessment of the City of London's HRIS Phase 1a and 1b implementation, the following observations were identified:

Risk Identified

- 1. **Inefficient Processes.** Phase 1a lacked adequate project documentation for the established project management process, and proponents were not aligned on interdepartmental functions or future state operational models.
- 2. **Inadequate Resources:** During Phase 1a, functional areas were overlooked in project planning, and project management resources were at, or exceeding, capacity.
- 3. **Unclear Strategic Alignment.** During Phase 1a, challenges in project governance, a lack of integrated planning, and limited strategic experience resulted in a poor alignment of services and capabilities with the City's needs and priorities.

Strengths and Project Praise

1. **Clear Effort Placed on Understanding the HRIS Project.** During Phase 1a, the City experienced attrition in project personnel and identified the need for broader Project Management Office (PMO) improvements. Developing project management templates on demand necessitates a thorough understanding of project requirements, strong organizational skills, and the ability to identify and prioritize key project elements. With enhanced tools and templates established in Phase 1a and a better understanding of interdepartmental resources, the City is expected to benefit from this investment in the future.
2. **Dedication and Expertise of Leadership.** Despite formal resource management challenges in Phase 1a, project leaders' dedication, expertise, and ingenuity allowed the City to progress with the implementation. Individuals needed to understand project requirements and constraints, adapt, and adjust. Ongoing quality assurance, process design, and solutioning in Phase 1a showed a commitment to modernizing the organization. Attention to detail and effective problem-solving skills of project leads minimized costs and enhanced the project's reputation and credibility, building stakeholder trust.
3. **Culture of Collaboration.** City leadership effectively managed challenges in the project schedule by maintaining transparent, accountable, and collaborative management practices. They fostered a culture of intrapreneurship, where project leadership was self-motivated and proactive. This led to impressive collaboration and consensus-building during the later stages of the project. Despite the significant impact of HRIS systems on front-line employees, City leadership maintained a positive operational environment for staff. The success of Phase 1a demonstrated the City's ability to manage and motivate team members without formal metrics in a resource-constrained environment, showcasing the skill and dedication of project leaders.

6.0 RECOMMENDATIONS AND ROADMAP ACTIVITIES

The following Recommendations will support the City of London in establishing HRIS Project and Change Management strategies, controls, and processes that will improve the Phase 2 release. These recommendations are based on MNP’s frameworks, experience, and observations of the City’s experience with Phases 1a and 1b.

While this HRIS Readiness Assessment is not a formal audit, the recommendations and roadmap have been presented in a familiar format to encourage management to consider the response and eventual approach to seeing the roadmap activities successfully completed.

#	Observation	Priority	Recommendation	Management Response
1	Phase 1a lacked adequate project documentation for the established process, and proponents were not aligned on interdepartmental functions or future state operational models. The City’s established HRIS environment became cumbersome as modern system leading practices interface with manual City workflows. This resulted in new HRIS capabilities not being fully realized and day-to-day operations at odds with project operations.	Medium	<p><i>The project management team should leverage the City’s existing standardized project management planning tools and ensure their adoption.</i></p> <p>Standardizing project management planning tools across City projects provides several key benefits. Standardized and accessible project management planning tools ensure that all project managers and team members are using the same tools and processes. This consistency helps streamline project planning and execution, leading to greater efficiency and a clearer future state for all stakeholders.</p> <p>Project documentation may seem like a simple answer to the complex questions surrounding knowledge management or business process management, but it can mature an organization rapidly. Templates that are used throughout project delivery, such as a business case one-pager, a project RACI, and project reporting, can standardize communication across the portfolio of City Projects.</p> <p>A RACI matrix, for example, can clarify roles and responsibilities for tasks and decisions within a project. The acronym stands for Responsible (the person or people responsible for completing a task), Accountable (the person ultimately answerable for the task or decision), Consulted (those who provide input and are consulted before a decision is made or a task is performed), and Informed (those who are kept informed of decisions or actions).</p>	For Phase 2, industry leading practices for project management will be reviewed by management and built into the project to align with this recommendation and activities outlined below.

#	Observation	Priority	Recommendation	Management Response
			<p>Standardized toolsets also help the City define the relationships between project delivery and continuous improvement.</p> <p>The goal of standardizing is to promote project delivery as a repeatable process. In standardizing project management planning resources for Phase 2, the City should undertake the following activities.</p> <p>Activity 1: The project management team should implement the City's existing Project Management Frameworks and Templates</p> <p>Identify and adopt common leading practices for managing projects and assemble them into a framework. Develop templates for project proposals, implementation plans, prioritization, and reporting. Design and develop value-focused training for project staff at all levels. Consider aligning artifacts to the project management toolset.</p> <p>Outputs for this activity are a Project Management Framework and Project Management Templates</p> <p>Activity 2: The project management team should implement the City's existing cloud-based project tracking and reporting system.</p> <p>Implement a cloud project management system. Ideally, the system will work in conjunction with any existing/future ticketing and knowledge management systems. Establish a set of reporting metrics that are collected and added to relevant leadership meetings. Determine a reporting schedule that suits the organization.</p> <p>Outputs for this activity are the Cloud-based project management system and Reporting Metrics.</p> <p>Activity 3: The project management team should implement the corporation's existing risk management and decision frameworks.</p> <p>In alignment with leading practices, create a repeatable approach for identifying, assessing, and mitigating organizational risks associated with HR technology and data. Determine the escalation process for risks and ongoing reporting. Create a decision-making model and risk</p>	

#	Observation	Priority	Recommendation	Management Response
			<p>management process to strategically manage projects and ensure success.</p> <p>This activity's outputs are a Risk Management Plan, a Risk Register, and a Program-level Decision-Making Model.</p>	
2	<p>During Phase 1a, functional areas were overlooked in project planning, and project management resources were at, or exceeding, capacity. The City lacked the dedicated labour force and skill mix required to implement this software appropriately.</p>	Medium	<p><i>The City of London should develop and implement a detailed resource model.</i></p> <p>A resource model for a project management office should be developed that outlines the various resources required to effectively manage and support projects within the City. The model should consider personnel, tools and technology, training and development, as well as external resources.</p> <p>Beyond the timeframe, the model should also consider the availability and capability of the needed skillsets, the risk of a given function performed outside the City, and the impact on the project budget.</p> <p>In developing a formal resource model for Phase 2, the City should undertake the following activities.</p> <p>Activity 1: Define Short-term and Long-term Resourcing Models.</p> <p>City leadership needs to define the resourcing model in the short term, during which the HRIS is implemented, and in the long term, as HRIS processes evolve in cross-department functions. Both models should clearly demonstrate how project management acumen can be increased across the City and ensure experienced project management professionals are accounted for.</p> <p>Outputs for this activity are a Short-Term Resourcing Model and a Long-Term Resourcing Model.</p> <p>Activity 2: Recruit Positions for Project Managers and Business Analysts.</p> <p>In order to successfully implement the HRIS, as well as deliver ongoing workforce services, the City should establish and fund</p>	<p>Proper resourcing, especially staffing models for a right-sized number of employees to manage the implementation and ongoing administration of Phase 1a, 1b, and 2, will be reviewed by management based upon this recommendation and activities.</p>

#	Observation	Priority	Recommendation	Management Response
			<p>positions for project managers and business analysis. These are strategic positions that will be instrumental in coordinating the Short-Term and Long-term Resourcing Models</p> <p>Activity 3: Leverage Third-Party Services.</p> <p>Identify mechanisms to procure third-party services for delivering capabilities that the City does not have the capacity for or may not be of strategic value. These could include bringing in coordination supports and subject matter experts via:</p> <ul style="list-style-type: none"> • Project-based Outsourcing: Engaging an external vendor to complete a specific project with defined deliverables and timelines. • Staff Augmentation: Adding temporary or contract personnel to your existing team to fill skill gaps or increase capacity for specific tasks or projects. • Vendor Co-Sourcing: Collaborating with an external vendor who works alongside your internal team to share responsibilities and resources. • Managed Services: Contracting an external provider to manage and assume responsibility for a specific set of functions or processes on an ongoing basis. <p>The outputs of this activity are effective project management support.</p>	
3	During Phase 1a proponents would have benefited from clear decommissioning plans and additional support in their roles as change leaders.	Low	<p><i>The City of London should invest in a formal change management framework that supports the project's strategic alignment.</i></p> <p>Change management is crucial to the successful implementation, adoption, and sustainment of any technology-based project. As the HRIS has such a broad user base, the City should ensure effective change leadership, oversight, and management are in place.</p> <p>This recommendation ensures City departments integrate effectively to support the implementation's overall goals. Change leadership encompasses all activities related to the change management</p>	Leveraging existing corporate change management and communication frameworks, management will review and implement this

#	Observation	Priority	Recommendation	Management Response
			<p>strategy, planning, and implementation, including ongoing organizational readiness and communications.</p> <p>In developing a formal change management framework for Phase 2, the City should undertake the following activities.</p> <p>Activity 1: The project management team should implement the City's existing change management models.</p> <p>Create a plan to guide program implementation and management, ensuring that the recommended activities remain on track and aligned with the City of London's goals. Establish an approach to managing change.</p> <p>ADKAR is a change management model that represents the five key elements required for individuals to successfully adopt a change. The acronym stands for Awareness (of the need for change), Desire (to support and participate in the change), Knowledge (of how to change), Ability (to implement the change), and Reinforcement (to sustain the change).</p> <p>The ADKAR model can guide the City through the process of managing and implementing change effectively by focusing on individual transitions. Adoption of a change model should account for the HRIS project schedule, key milestones and decision gates, dependencies, controls, and budget.</p> <p>Outputs for this activity are a Formalized Change Management Plan</p> <p>Activity 2: Review and Prepare Communication Strategy and Plan.</p> <p>Review and update internal and external Communications Strategy and Plan to inform employees and stakeholders on the purpose, progress, and impacts.</p> <p>Outputs for this activity include a Communication Strategy and a Project-level Communication Plan.</p>	<p>recommendation and activities into Phase 2, as well as build upon the existing rollouts of Phases 1a and 1b.</p>

APPENDIX A – RATING SCALE

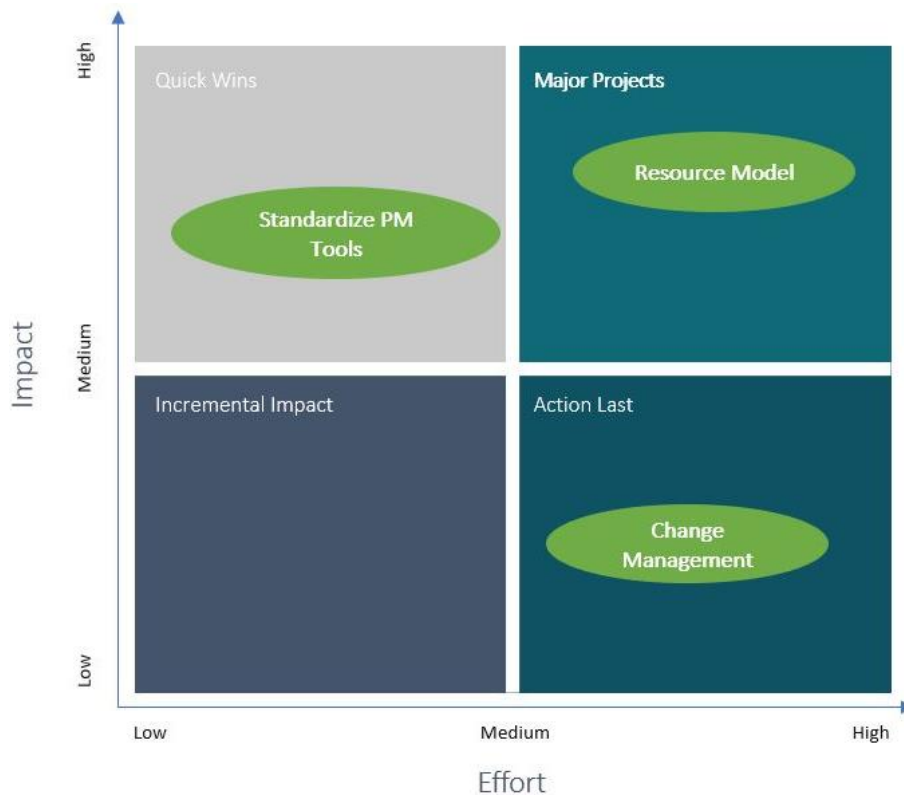
The findings outlined in this report have been assessed based on a rating scale defined in the table below:

Rating	Description
Low	The finding is not critical but should be addressed in the longer term to improve either internal controls, efficiency of the process, or mitigate a minor risk.
Medium	The finding represents a control weakness or risk that could have or is having an adverse effect on the ability to achieve process objectives and/or a significant impact to the City's residents. The finding requires Management action within the short-to-intermediate term.
High	The finding represents a significant control weakness or risk that could have or is having a major adverse effect on the ability to achieve process objectives and/or a material impact to the City's residents. The finding requires immediate Management action.

APPENDIX B – MNP PRIORITIZATION MATRIX

This Prioritization Matrix evaluates the impact of recommendations to determine where time, energy, and resources could be invested. It will help in understanding the incremental steps required to build a roadmap. There are four (4) quadrants.

1. **Quick Wins:** Activities that have valuable impacts on the organization but are not time or resource intensive.
2. **Incremental Impact:** Activities that are identified as medium priority, require a longer timeframe to implement, and are more resource intensive.
3. **Major Projects:** Activities that are major organizational undertakings, require dedicated resources (both funding and individuals), and require a longer period of time to implement.
4. **Action Last:** Activities that are considered low priority, require a longer timeframe and are resource intensive.





APPENDIX C – REPORT DISTRIBUTION LIST

City of London
To:
John Paradis, Deputy City Manager, Enterprise Supports Anna Lisa Barbon, Deputy City Manager, Finance Supports
MNP
Dean Leesui, Engagement Partner Phil Racco, Quality Assurance Partner Kate Dergousoff, Consultant Ryan Clarke, Consultant

City of London - Internal Audit

Accessibility Review

Final Report – September 3, 2024

Prepared By: Geoff Rodrigues, CPA, CA, CIA, CRMA, ORMP, CSC
Partner, Enterprise Risk Services
MNP
Email: geoff.rodriques@mnp.ca

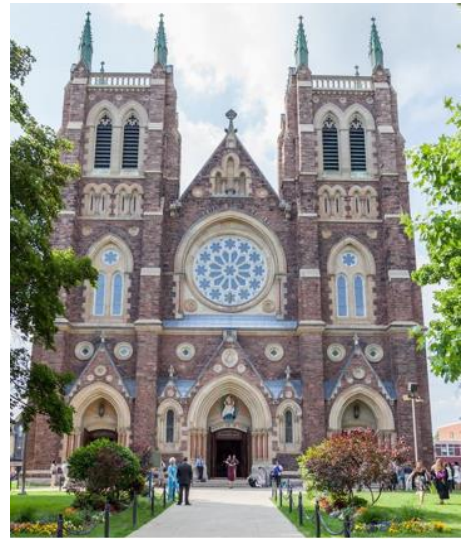


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1.0 BACKGROUND

The City of London (City) is a municipality with a population of 439,500 as of 2023 and it provides various community support services to its residents including neighborhood support programs, infrastructure services, recreational amenities and cultural organizations and programming. As a municipality, the City is continually attempting to improve its operating efficiency, effectiveness, and transparency for the benefit of its residents.

Consequently, the City is committed to accomplishing the principles outlined in the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) to meet the needs of residents and visitors with disabilities, through the implementation of the requirements of the AODA. As per the AODA, all businesses and public spaces must meet compliance requirements by January 1, 2025, including its standards as defined in the Integrated Accessibility Standards Regulation (IASR). This includes standards in the following areas:

- General Accessibility Requirements
- Customer Service
- Information and Communication
- Employment
- Transportation
- Design of Public Spaces

In pursuit of continuous improvement and in accordance with the City's FY2023 internal audit plan, a targeted review was performed to confirm compliance with AODA requirements and to understand any key gaps and issues so that these can be reviewed and remediated in order to ensure citizens are being appropriately supported by the City.

2.0 OBJECTIVE

The objective of this targeted review was to assess the City's compliance with the AODA, and the standards defined in the IASR in order to provide an overview of gaps in compliance, the associated risks with non-compliance, and recommendations for improvement.

3.0 SCOPE

This review followed a structured and targeted approach to confirm compliance to the AODA and IASR in the following key areas:

1. Accessible procurement practices;
2. Accessible emergency preparedness; and
3. Interpretation of the Zoning By-law No. Z.-1¹ with accessibility requirements.

¹ The Zoning By-law can be found online: <https://london.ca/by-laws/5111>

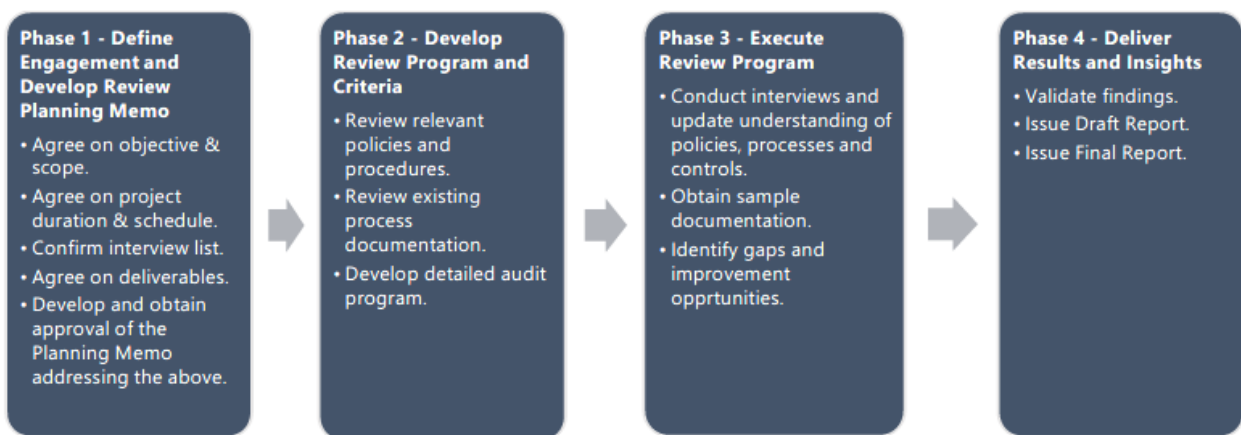
4.0 RISKS

Given the stated objective of this targeted review, several inherent² risks were identified and considered in the planning of this review which include:

- Lack of leadership, ownership and accountability of AODA requirements;
- AODA requirements, standards and legislation are not understood and communicated; and,
- Legislated AODA requirements are not met resulting in non-compliance.

5.0 APPROACH

In accordance with MNP's Internal Audit methodology, the high-level work plan for this targeted review included the following phases:



6.0 SUMMARY OF OBSERVATIONS

The City's compliance to the AODA legislation falls under the responsibility of the Accessibility and Inclusion Advisor. Their responsibility is to oversee that compliance requirements are met and complete the required government reporting. In addition, the Accessibility and Inclusion Advisor supports the City's Accessibility Community Advisory Committee and oversees accessibility activity beyond compliance requirements to further embed and mature the City's accessibility.

Overall, MNP did not find any significant compliance issues during the conduct of this targeted review, however, MNP did note several areas for improvement to better incorporate accessibility requirements and remove or reduce barriers to remain in alignment with the spirit of the AODA legislation.

A detailed summary and overall observations for each area reviewed are noted below. Key strengths, and recommendations and opportunities for improvement have been identified. Detailed information on the observations and recommendations can be found in the Detailed Observations and Recommendations section of this report. A summary of the City's compliance to the AODA and each in-scope standard within the IASR has been provided in Appendix C: Compliance Ratings.

² The risk derived from the environment without the mitigating effects of internal controls; Institute of Internal Auditors

KEY STRENGTHS

Area	Strength
Procurement	<p>The City has an established Procurement Policy. This policy governs all procurement related activity, and therefore, requires accessibility to be considered.</p> <p>The City has implemented several mechanisms to ensure third-party's attest to their compliance to training requirements set out in the AODA.</p>
Emergency Preparedness	<p>The City has put significant efforts towards improving and maturing its emergency preparedness when responding to community-based emergencies. This includes partnering with third parties to ensure accommodation needs will be fulfilled and ensuring that accessibility is a consideration during tests and exercises. These efforts exceed the requirements set out in the IASR.</p>

PROCUREMENT

When performing a review of the City's accessible procurement practices, MNP specifically reviewed existing documentation and practices. MNP understands that the City is imminently going to undertake a refresh of all its procurement practices and associated documentation. With this in mind, we have provided examples of practices we believe should continue (and should be incorporated into processes) as well as opportunities to implement improvements.

The City's Procurement Policy includes wording to ensure accessibility is incorporated during procurement. This Policy governs all procurement related activity and is important in defining the City's requirements. When refreshing its procurement policy, the City should retain this language.

The City's procurement practices require the business areas to ensure they are considering accessibility when making a purchase. In general, it is left up to the business areas to understand their procurement needs and identify accessibility requirements.

When a purchase is valued at \$15,000 or more, a Procurement Initiation Approval (PIA) form is completed. The PIA form is completed by the business area and submitted to the Purchasing team. The PIA form includes a query to determine if the third-party needs to be compliant with the IASR's training requirements. If yes, the third-party will be required to complete the AODA Contractor Self Declaration form. The City also has Standard Terms and Conditions for vendors, which indicates that any successful bidder is required to ensure they are compliant with the training requirements within the IASR. These are both mechanisms in place to ensure vendors are compliant with the training requirements set out in the IASR.

While there are processes in place that demonstrate that the requirements are being met, there are several areas of improvement where accessibility practices could be further strengthened. These are provided below in the table below.

Observation	Recommendation
Procurement	
<p><u>Procurement Process</u></p> <p>As the City is undertaking a refresh of its procurement practices, there is opportunity to further embed accessibility into the overall process.</p>	<p>The City should look to incorporate accessibility considerations into various checkpoints along the procurement process. This includes:</p> <ul style="list-style-type: none"> • At procurement initiation. • During development of Request for Proposal / Services / Quotes, etc. documents. • During bid evaluation. • During the contracting phase. • Vendor assessment activities.
<p><u>Accessible Procurement Awareness</u></p> <p>Much of the responsibility of knowing when to incorporate accessibility into procurements is put on the responsibility of the business areas. Some business areas will have more awareness based on the nature of their work, but others may not.</p> <p>There is opportunity to increase business area knowledge about how accessibility can be incorporated.</p>	<p>The City should look to provide formal training to increase awareness amongst all business areas and individuals who are authorized to make purchases. This training should provide guidance and examples on when accessibility considerations are required.</p>
<p><u>Service Provider Training</u></p> <p>While there are requirements that Vendors may need to comply with IASR Training requirements, there is opportunity to provide more information so that vendors can better assess their compliance requirements.</p>	<p>The City should look to provide increased guidance within the PIA form to help City employees determine whether or not the potential vendors will need to comply with the training requirements.</p>

Additional details can be found in the [Detailed Observations and Recommendations](#) section of this report.

EMERGENCY PREPAREDNESS

There are two (2) aspects to the City’s emergency preparedness that were assessed as part of this review. This includes the internal emergency preparedness for the organization (e.g., for staff) as well as emergency preparedness for the community. It is important to note that emergency preparedness requirements in the IASR for the community is limited to ensuring that London’s Emergency Response Plan is provided in accessible format, however, MNP reviewed how accessibility was incorporated into emergency planning, preparedness and response.

Internally, the City works with its staff to support individuals who request accommodation and support in case of emergency. Individuals are encouraged to work with their respective Supervisor or Manager, with the Human Resources team, and the Emergency Management and Security Services (EMSS) Department to identify and address any accommodation supports or needs. The EMSS Department and the individual work to complete and document an Individualized Workplace Emergency Response Plan form. If any training is involved, this is completed as required with the individuals with the need, as well as with any individuals who will support.

The EMSS department is also responsible for the development and maintenance of the London Emergency Response Plan (LERP) and for overall community emergency preparedness. The LERP is available on the City's public website and is considered an accessible document per web document compliance requirements. As part of planning the City must prepare for different types of emergencies and anticipate the many different types of individuals with disabilities that would require support. The City has implemented several mechanisms to remain agile and flexible in supporting accessibility needs for individuals. The EMSS department has maintained relationships with several partners (including hospitals, Red Cross, etc.) who can be called on at any time to provide support as needed for a person with a disability (e.g., to procure a wheelchair, cane, sign language interpreter). In addition to this, and as part of their overall preparedness, the EMSS Department also performs emergency tests and exercises under the assumption that they will be supporting individuals with disabilities. The EMSS department has fully embraced the assumption that accessibility needs to be incorporated into all of their emergency preparedness and response activities.

While the City's emergency preparedness is in good shape, it should continue efforts to ensuring accessibility is incorporated into internal and external practices.

BYLAW INTERPRETATION

There are many areas of the Design of Public Spaces Standard that can apply to the City's [Zoning Bylaw](#). Within our report, we have provided some key information related to the Design of Public Spaces Standard that can support the interpretation and application to the Zoning Bylaw. We have not made specific recommendations, as the nature of interpretation will vary by the query or issue identified. The Design of Public Spaces Standard covers several different areas, including:

- Recreational Trails and Beach Access Routes
- Outdoor Public Use Eating Areas
- Outdoor Play Spaces
- Exterior Paths of Travel
- Accessible Parking
- Obtaining Services

When queries about the AODA and bylaw are received, initial interpretation should be completed by the advisory team (i.e., the Director, Anti-Racism and Anti-Oppression; or the Accessibility and Inclusion Advisor), followed by validation from the legal team. Some queries may benefit from consultation with the City's Accessibility Community Advisory Committee to determine the best solution.

We have provided supporting guidance on the interpretation of the IASR and its application to the Zoning Bylaw, which can be found in [Section 8 Bylaw Interpretation](#).

6.1 ACKNOWLEDGEMENT OF COOPERATION AND EFFORTS

Internal Audit would like to express our appreciation for the cooperation and efforts made by City personnel with the Emergency Preparedness, Purchasing, and Human Resources departments who share responsibilities for accessibility elements within the scope of this review. Their contributions assisted in ensuring a successful engagement.

6.2 LIMITATIONS AND RESTRICTIONS

This report is intended solely for the information and use of the City of London and should not be distributed to third parties without MNP's prior written consent. Any use that a third party makes of this report, and any reliance or decisions made based on it, are the responsibility of such third party. MNP accepts no liability or responsibility for any loss or damages suffered by any third party as a result of decisions made or actions taken based on this report.

7.0 DETAILED OBSERVATIONS AND RECOMMENDATIONS

#	Observation	Rating	Recommendation	Management Responses
1	<p><u>Procurement Process</u></p> <p>As the City is undertaking a refresh of its procurement practices, there is opportunity to further embed accessibility into the overall process.</p>	Low	<p>The City should look to incorporate accessibility considerations into various areas of the procurement process. Key areas include:</p> <p><i>Procurement initiation:</i> In order to ensure accessibility is considered, the Procurement Initiation Approval (PIA) form can be updated to include a question about whether the goods, services, or facilities being procured need to consider accessibility. The form can be updated to include additional guidance to help arrive at a decision.</p> <p>Currently, accessibility consideration is primarily determined at the initiation of a procurement and identified by the business areas. When business areas identify the need to complete a procurement, they should have enough awareness and understanding to determine the requirements (Refer to Observation #2).</p> <p><i>During development of Request for Proposal / Services / Quotes, etc. documents:</i> The City's templates for Request for Proposal / Services / Quote etc. should be reviewed and modified to include a section on accessibility requirements within the deliverables. The users should be able to customize these requirements as needed. In addition to this, there can be clauses within the terms that indicate that the winning bidder will be required to submit a copy of their most recent Accessibility Compliance Report (ACR) that was submitted to the Ministry. The bid documents could also include clauses that will allow the City to audit an organization for their AODA compliance.</p>	<p>Action Plan:</p> <p>Procurement will co-ordinate with ARAO office on identifying additional tools that can be referenced in the PIA, and other bid documents and procurement templates</p> <p>Accountability:</p> <p>Senior Manager, Procurement and Supply</p> <p>Timeline:</p> <p>2nd half of 2025</p>

#	Observation	Rating	Recommendation	Management Responses
			<p>The City can also consider including an appendix into their bid documents, which require an organization to declare their compliance with the AODA.</p> <p><u>During bid evaluation:</u> There are several areas where accessibility can be incorporated into bid evaluation:</p> <ul style="list-style-type: none"> • The City can consider including accessibility considerations into the evaluation criteria of a procurement (if appropriate to the nature of the goods, services, or facilities being provided). • The City can consider including a pass/fail evaluation for the requirement of the third-party to self-declare their AODA compliance. • The City can consider including a third-party's past performance related to accessibility as part of the evaluation criteria. <p><u>During the contracting phase:</u> The City should ensure accessibility requirements are included in contracts. While the City's Standard Terms and Conditions include these requirements, it is important the City ensures that accessibility requirements are reviewed and included when required/possible in third party contracts where the terms and conditions used are not the City's.</p> <p><u>Third-party assessment activities:</u> Although they City does not currently have an established third-party assessment program, the City can consider using a third-party's past performance in relation to accessibility as a factor for third-party evaluation, contract renewal, or potential future work.</p>	

#	Observation	Rating	Recommendation	Management Responses
2	<p><u>Accessible Procurement Awareness</u></p> <p>The responsibility of knowing when to incorporate accessibility into procurements is often placed on the City's business areas. Some business areas have more awareness on accessibility requirements based on the nature of their work than others and there is a risk that other business areas may not.</p> <p>Accessibility requirements can vary significantly and there is an opportunity to increase business area knowledge and awareness on these requirements.</p>	Low	<p>The City should look to provide awareness training to all business areas and individuals who are authorized to make purchases. The training should provide guidance and examples on when accessibility considerations are or could be required. For example, accessibility should be considered in the following circumstances:</p> <ul style="list-style-type: none"> • When procuring goods / services / or facilities with technical features. For example: <ul style="list-style-type: none"> ○ Software ○ Documents ○ Websites – Note that the City's website and any web content (i.e., documents, videos, etc.) are required to be compliant per Section 14 of the Information and Communications Standard in the IASR. • When procuring goods / services / or facilities with structural features. For Example: <ul style="list-style-type: none"> ○ physical design (e.g., when working with engineers or architects) ○ hardware or product specifications (e.g., when working with contractors). <p>This guidance should apply to purchases of any value, and regardless of whether the Purchasing team is involved in the procurement.</p> <p>Once the City has completed the exercise of refreshing its procurement process, this awareness training should be provided as part of the implementation and roll-out of the refreshed process.</p>	<p>Action Plan:</p> <p>The update to the procurement policy along with the roll-out of the refreshed process will look to increase accessibility considerations and awareness particularly in low dollar procurements and informal processes.</p> <p>Accountability:</p> <p>Collaboration between ARAO Office, and Procurement.</p> <p>Timeline:</p> <p>Mid 2026</p>

#	Observation	Rating	Recommendation	Management Responses
3	<p><u>Service Provider Training</u></p> <p>The Procurement Initiation Approval (PIA) form includes a section that asks whether vendors are required to complete an AODA Contractor Self Declaration Form. The AODA Contractor Self Declaration Form requires vendors to indicate whether or not they have completed the training required by the AODA. While its is important that this be completed, there does not appear to be any guidance for users to determine when this is required.</p>	<p>Low</p>	<p>There is an opportunity to add additional direction in the PIA form to support with determining when a contractor is required to complete this training. That is, the training requirement applies to organizations that provide goods, services or facilities on behalf of the organization. This can include outsourced services, such as payroll, facilities management and contact centres.</p> <p>The City should also retain any records of compliance for a contractor or third-party (e.g., copies of the third-party's attestations or training records).</p>	<p>Action Plan:</p> <p>Procurement will work with ARAO to determine what additional documentation/ records could be provided as part of the documentation required over and above the existing self declaration</p> <p>Accountability:</p> <p>Senior Manager, Procurement and Supply</p> <p>Timeline:</p> <p>Mid 2026</p>

8.0 BYLAW INTERPRETATION

The Zoning By-law can be found online: <https://london.ca/by-laws/5111>

KEY CONSIDERATIONS

The following key aspects of the Design of Public Spaces Standards should be kept in mind when addressing questions or issues related to the Zoning Bylaw:

- The Design of Public Spaces Standard only applies to obligated organizations. This includes:
 - The Government of Ontario;
 - The Legislative Assembly;
 - A designated public sector organization;
 - A large organization (organization with 50 or more employees in Ontario); and
 - A small organization (an organization with at least one but fewer than 50 employees in Ontario).

To clarify, the Standard does not apply to individuals. For example, it does not apply individual residential homeowners but may apply to a landlord or property manager who operates under a business license and has at least one employee in Ontario. Even if the business is registered outside Ontario or Canada, if they have an employee in Ontario, they must comply.

- The organizations that construct or redevelop the space must comply with the Standard, but compliance is a shared responsibility between the developer and the planner / architect / engineer / etc. This means that organizations need to work together to address compliance requirements.
- The Design of Public Spaces Standard applies to public use areas only. If an area is for private use and is not open to the general public, then compliance is not required. For example:
 - Individual homeowner: Is not required to comply with the Standard because they are not an obligated organization, and their property is considered private (i.e., not open to the public).
 - A hotel: The organization that owns the business is likely an obligated organization. The building premises are visited by guests (i.e., it is open to the public). This organization would be required to comply with the Standard.
 - A long-term care centre: The organization that owns the business is likely an obligated organization. The building premises, while intended for residential use, is often visited by guests (i.e., it is open to the public). This organization would be required to comply with the Standard. This organization also likely has obligations under the Ontario Human Rights Code to accommodate unit owners or tenants.
 - An apartment or condominium: The organization that owns the apartment or condominium is likely an obligated organization that permits guests to visit (i.e., it is open to the public). This organization would be required to comply with the Standard. This

organization also likely has obligations under the Ontario Human Rights Code to accommodate unit owners or tenants.

- An Office Building: The organization that owns the facility is likely an obligated organization. The building premises are visited by staff and guests (i.e., it is open to the public). This organization would be required to comply with the Standard. This organization also likely has obligations under the Ontario Human Rights Code to accommodate employees.
- The Design of Public Spaces Standard is not retroactive. This means that it is only applicable to buildings and renovations completed after the implementation date (i.e., 2016 for designated public sector, 2017 for large organizations and 2018 for small organizations).
- Many accessible elements (e.g., bathrooms, elevators, etc.) fall under the Ontario Building Code, not the AODA.
- The AODA and IASR is not a replacement or a substitution for the requirements established under the Human Rights Code nor do the standards limit any obligations owed to persons with disabilities under any other legislation.

RECREATIONAL TRAILS AND BEACH ACCESS ROUTES

A recreational trail is a public pedestrian trail intended for recreational and leisure purposes. The standard applies to newly constructed or redeveloped recreational trails that an organization intends to maintain. The standard does not apply to the certain types of recreational trails, such as wilderness trails, backcountry trails and portage routes. These types of trails are difficult to access because of their location and are built in a way that reduces their impact on the natural environment.

Multi-use trails are used for different purposes at different times. For example, pedestrians may use a trail in the summer, but in the winter, the trail becomes a snowmobile trail. Another example is a pedestrian trail that is also a biking trail. These types of trails are not “solely intended” for either snowmobiling or biking and are required to comply with the Standard.

Beach access routes are routes constructed for public pedestrian use that provide access to public beaches from off-street parking facilities, recreational trails, exterior paths of travel and amenities. The standard applies to beach access routes that can be either permanent or temporary but does not apply to beach access routes that are created through repetitive use and without formal authorization.

Organizations must meet the requirements of the standard when they construct a recreational trail or beach access route that they intend to maintain or redevelop an existing one.

This section of the Standard will likely apply to (but is not limited to) the following sections of the Zoning Bylaw:

- Section 36: Open Space Zone. For example:
 - Municipal public parks
 - Golf courses
 - Conservation areas, etc.

OUTDOOR PUBLIC USE EATING AREAS

Outdoor public use eating areas are public areas with tables intended for use by the public as places to consume food. Examples include (but are not limited to) picnic tables in public parks, in shopping plazas, on hospital grounds or university campuses, and outdoor food courts in amusement parks or resorts.

Private and not-for-profit organizations with 49 or fewer employees are not required to comply with the requirements.

This section of the standard will likely apply to several different sections of the bylaw, depending on if an eating area is developed and open to the public or if it is accessible by guests or employees of a business/organization. This section of the Standard will likely apply to (but is not limited to) the following sections of the Zoning Bylaw:

- Sections 16-18: Office areas. For Example:
 - Where a business area may include picnic table for staff
- Section 20: Downtown Area Zone
- Sections 21-23: Regional, Community, Neighbourhood, or Associated Shopping Areas Zones
- Section 35: Day Care Zone
- Section 36: Open Space Zone. For Example:
 - Municipal public parks
 - Conservation areas, etc.
- Section 39: Office Business Park

OUTDOOR PLAY SPACES

Requirements apply to new play spaces or existing play spaces that are redeveloped that an organization plans to maintain.

Organizations have the flexibility to design play spaces that are creative, fun and challenging for children of all ages and abilities. A number of resources are already available that can help organizations develop accessible play spaces for everyone. Annex H of the Canadian Standards Association's Standard for Play Spaces (CAN/CSA Z614), and the Ontario Parks Association's PlayAbility Toolkit are examples of useful resources that can help organizations determine the best way to incorporate accessibility features into their play spaces.

Private and not-for-profit organizations with 49 or fewer employees are not required to comply with the requirements.

This section of the Standard will likely apply to (but is not limited to) the following sections of the Zoning Bylaw:

- Section 35: Day Care Zone
- Section 36: Open Space Zone. For Example:
 - Municipal public parks
 - Conservation areas, etc.

MNP recognizes that the information within this section of the Standard is not always prescriptive, and is sometimes open to interpretation (e.g., what is considered a firm surface for a playground?). The City

should consider engaging with its Accessibility Community Advisory Committee (ACAC) for consultation and advisory when developing public spaces or responding to queries related to the Zoning Bylaw. As the ACAC is made up of various individuals including those with disabilities, they may offer insights through their lived experiences.

EXTERIOR PATHS OF TRAVEL

All sections apply to all organizations except small private or not-for-profit organizations with 1-49 employees. The requirements apply to paths intentionally designed for pedestrian use. They do not apply to unplanned paths that pedestrians may use, such as short cuts.

There are many sections of the zoning bylaw where this standard would be applicable depending on if an exterior path is available to the general public, or accessible by guests or employees of a business or organization. This can include paths for (but is not limited to):

- Shopping plazas
- Golf courses
- Amusement parks
- Municipal public parks
- Office buildings
- Apartments and condominiums
- Townhouse complexes
- Residential areas where there is a public sidewalk.

PARKING

The requirements for accessible parking spaces in off-street parking facilities apply to parking spaces that are intended for public use. The regulation does not apply to off-street parking facilities that are used exclusively for other purposes, such as lots used exclusively for buses, delivery vehicles, law enforcement vehicles, medical transportation vehicles or impounded vehicles.

If a portion of any off-street parking facility includes parking spaces for the public, these spaces must meet the requirements in the regulation. For example, the requirements for accessible parking will apply to visitor/guest spaces only and not to the other parking spaces in parking facilities for employees or unit owners/tenants in multi-unit residential housing, such as an apartment, townhouse or condominium. Landlords and employers already have a legal duty to accommodate employees or unit owners/tenants with disabilities under the Ontario Human Rights Code.

There are many sections of the zoning bylaw where this standard would be applicable depending on if an off-street parking facility is being developed and is available to the general public, or by guests or employees of a business or organization. This can include paths for (but is not limited to):

- Shopping plazas
- Golf courses
- Amusement parks
- Municipal public parks
- Office buildings
- Apartments and condominiums

OBTAINING SERVICES

The requirements in this section apply to all new counters and fixed queuing guides. They also apply to all new and redeveloped waiting areas with fixed seating. Any of these features can be located either indoors or outdoors.

Service counters are intended to be a place where a person receives a service. This can include check-out counters, hospitality/concierge desks or information kiosks. Organizations must make sure that the service counters they are purchasing and/or constructing will work for customers using mobility devices. This applies to service counters located indoors and outdoors.

Fixed queuing guides are often used to organize long customer service lines, such as those that serve multiple service counters. Making them accessible for people with various disabilities is part of making the services accessible. These requirements only apply if the queuing guides are fixed to the floor, both indoors and outdoors. They do not apply to temporary guides, such as moveable posts and ropes.

Waiting areas form part of many service areas. Making sure that indoor and outdoor fixed seating areas provide spaces where a customer or patron using a mobility device can wait is essential to providing services for people with disabilities. This does not apply to waiting areas where furniture can easily be moved to accommodate.

There are many sections of the zoning bylaw where this standard would be applicable depending on if a service counter, fixed queuing guide, or waiting areas with fixed seating has been developed and is available to the general public, or by guests or employees of a business or organization. This can include reception or front desk areas for (but is not limited to):

- Hotels
- Amusement parks
- Golf courses
- Campgrounds
- Office reception areas
- Retail stores

APPENDIX A – LIST OF RELEVANT STANDARDS WITHIN THE IASR

The Integrated Accessibility Standards Regulation, O. Reg. 191/11 can be found [online](#).

Section	Sub-Section	Section Number	Compliance Rating	Reference (Observation and Recommendation)
Procurement				
General	Procuring or acquiring goods, services or facilities	5	Compliant	Observation and Recommendation #1 and 2
	Training ³	7	Compliant	Observation and Recommendation #3
Customer Service	Training for staff, etc. ⁴	80.49	Compliant	Observation and Recommendation #3
Emergency Preparedness				
Information and Communications	Emergency procedure, plans or public safety information	13	Compliant	N/A
Employment	Workplace emergency response information	27	Compliant	

³ Specifically related to training for organizations that provide goods, services, or facilities on behalf of the City of London.

⁴ Specifically related to training for organizations that provide goods, services, or facilities on behalf of the City of London.

Section	Sub-Section	Section Number	Compliance Rating	Reference (Observation and Recommendation)
Zoning Bylaw Interpretation				
Design of Public Spaces Standards	Recreational Trails and Beach Access Routes	80.6, to 80.15	Compliant	N/A
	Outdoor Public Use Eating Areas	80.16, 80.17	Compliant	
	Outdoor Play Spaces	80.18 to 80.20	Compliant	
	Exterior Paths of Travel	80.21 to 80.31	Compliant	
	Accessible Parking	80.32 to 80.39	Compliant	
	Obtaining Services	80.40 to 80.43	Compliant	

APPENDIX B – RATING SCALE

The findings outlined in this report have been assessed based on a rating scale defined in the table below:

Rating	Description
Low	The finding is not critical but should be addressed in the longer term to improve either internal controls, efficiency of the process, or mitigate a minor risk.
Medium	The finding represents a control weakness or risk that could have or is having an adverse effect on the ability to achieve process objectives and/or a significant impact to the City's residents. The finding requires Management action within the short-to-intermediate term.
High	The finding represents a significant control weakness or risk that could have or is having a major adverse effect on the ability to achieve process objectives and/or a material impact to the City's residents. The finding requires immediate Management action.

APPENDIX C – REPORT DISTRIBUTION LIST

This report was distributed to the following parties:

City of London
To:
Sanjay Govindaraj, Director, Anti-Racism and Anti-Oppression Melanie Stone, Accessibility and Inclusion Advisor Sandra Datars Bere, City Manager Anna Lisa Barbon, Deputy City Manager, Finance Supports
MNP
Geoff Rodrigues, Engagement Partner Phil Racco, Quality Assurance Partner Deepak Jaswal, Engagement Leader Reena Patel, Subject Matter Expert