



City of London - Internal Audit

Accessibility Review

Final Report – September 3, 2024

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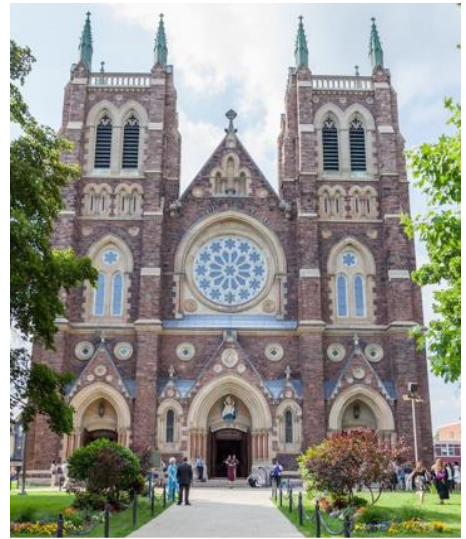


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1.0 BACKGROUND

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>

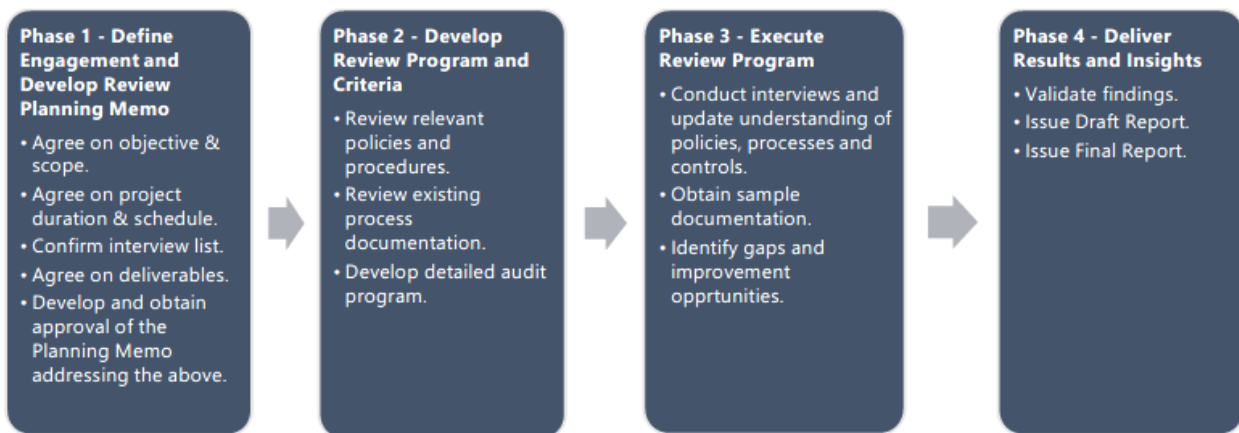
4.0 RISKS

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
<p style="text-align: center;">Low</p>	<p>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.</p>
<p style="text-align: center;">Medium</p>	<p>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.</p>
<p style="text-align: center;">High</p>	<p>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.</p>

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