

February 22, 2023

To the members of CWC,

Thank you for the opportunity to present and provide documentation to the Civic Works committee. As described in the letter requesting delegation status, for too long disabled Londoners have been confined by a broken and fragmented accessible transit system. Rather than providing access to our city, Paratransit demands users to form their lives around the system, whether it is spending hours on the phone trying to book a ride or having work, medical and social life determined by a limited number of pick-up times. Our broken system is leaving far too many disabled folks waiting at the curb, unable to equitably participate in the social and economic opportunities enjoyed by nondisabled Londoners.

Within this package, we have included a brief presentation with important perspectives, context, and statistics to help assess the current state of Paratransit in London. We have also included a number of stories, anecdotes and opinions shared by Paratransit riders who felt it was important to give a view into a life disabled by our system. While shocking and unacceptable, these experiences are all too common for those reliant on Paratransit and reflect a dysfunctional parallel transit system that the London Transit Commission appears either unable or unwilling to fix.

Accessible transit in London is possible, but only if you choose to act.

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PARATRANSIT IN LONDON

"Equal access by persons with disabilities, older Ontarians, and families with young children to adequate, dignified public transit services is a right protected under the Ontario Human Rights Code."

Human Rights and Public Transit Services in
Ontario, Consultation Report March 27, 2002

SOME IMPORTANT PERSPECTIVES

"I am also shocked at the lack of training these drivers receive, to deal with customer service issues, sensitivity training to deal with different types of people , not knowing important destinations such as hospitals, shopping centers , etc.

Also, as a transgender person, I can't count the times I've been dealt with in an inappropriate manner with drivers from Voyago."

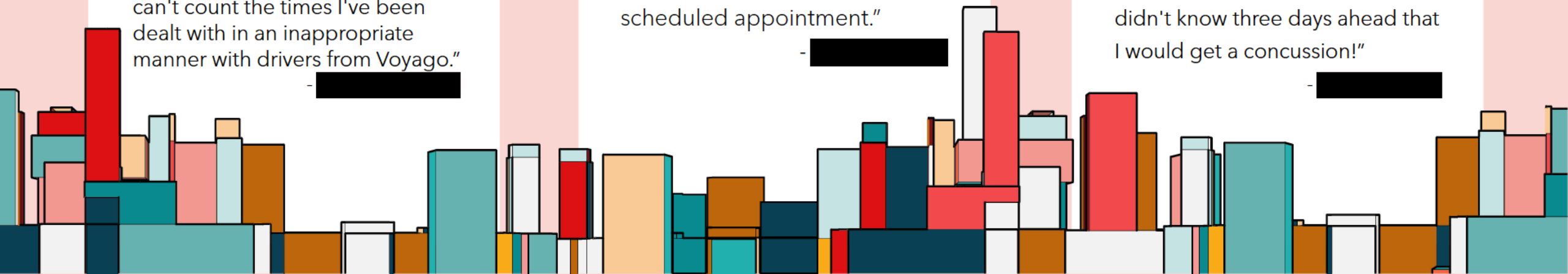
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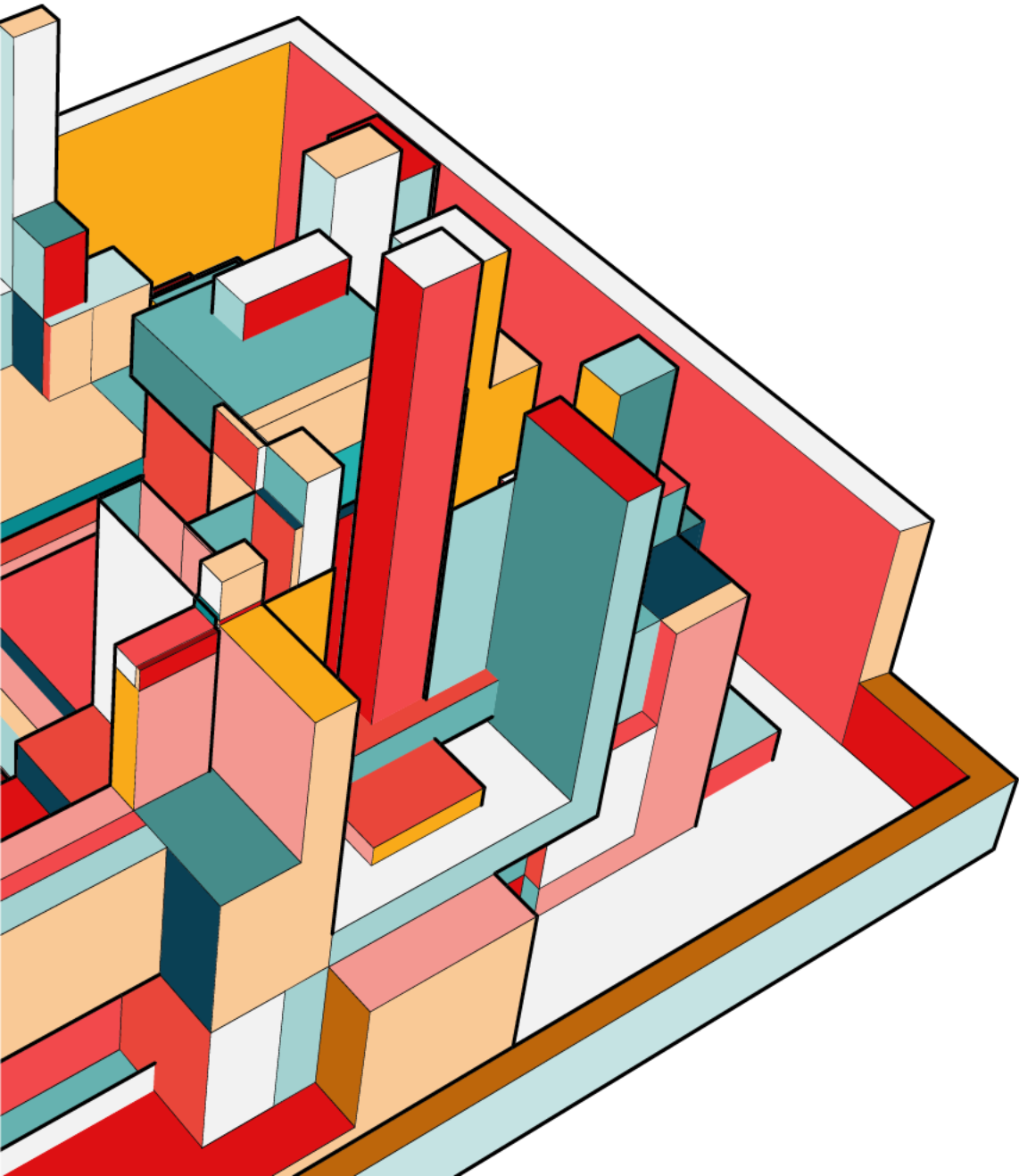
"...I learned quickly that paratransit was a terrible service due to having to set an alarm and spam call at 7 in the morning sometimes for [30min to over an hour] and like trying to win a prize on the radio only to find out I couldn't make my scheduled appointment."

- [REDACTED]

"Another time I got suspended for two weeks until my dad called to help me get the service back. I had a booking made to go to Fanshawe. But I was playing sledge hockey and got a concussion and was really sick. I tried to tell them I couldn't go. I didn't know three days ahead that I would get a concussion!"

- [REDACTED]





WHAT WE'RE HEARING

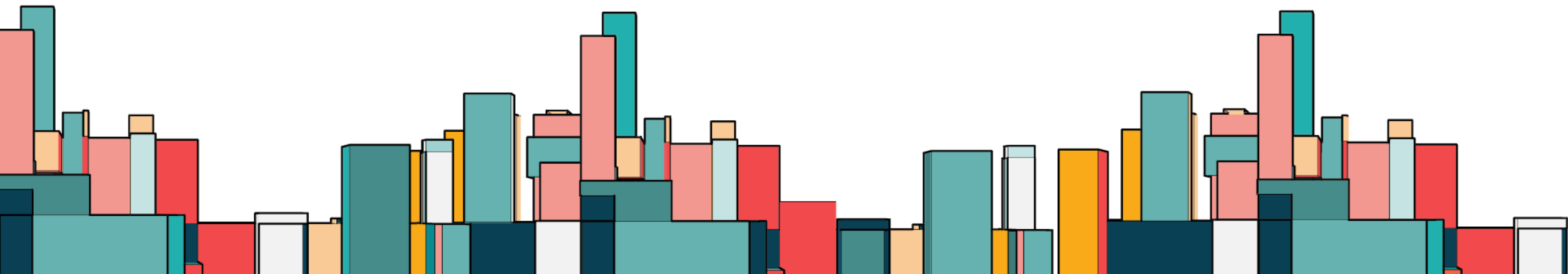
- ❑ Dialing 100s, sometimes 1000s, of times to book a ride
- ❑ Limitations of the 3-day pre-booking requirement
- ❑ Lack of available rides and limited service hours
- ❑ Late or missed pick-ups
- ❑ Excessive amount of time spent on bus
- ❑ Safety concerns and lack of respect from drivers
- ❑ Disciplinary nature of the system

HUMAN RIGHTS OBLIGATIONS

Under the *Code*, persons with disabilities, older persons, and families with young children have a right to equal treatment in the provision of public transit services. As part of this, human rights laws create a right to accommodation with dignity. Providers of public transit have a duty to design and develop transit systems in such a way as to maximize accessibility, and to remove barriers to accessibility where they exist. This may include integration of conventional systems, as well as the development and maintenance of paratransit systems.

It should be emphasized that the standard for the duty to accommodate is a high one. The factors to be considered in assessing undue hardship are costs, outside sources of funding, and health and safety. Costs will be considered to amount to undue hardship if they are quantifiable, shown to be related to the accommodation, and so substantial that they would alter the essential nature of the enterprise, or so significant that they would substantially affect its viability.

The duty to accommodate patrons with disabilities is not a voluntary or temporary duty. It is an ongoing legal duty under ss.1, 11 and 17 of the *Code*. The provisions regarding special programs cannot be used as a defense in place of a service provider's responsibility to accommodate disability short of undue hardship. Paratransit programs cannot be viewed as special programs, or as a complete response to the duty to accommodate. Rather, they are one aspect, along with the integration of conventional systems, of the duty to accommodate to the point of undue hardship.



AODA REQUIREMENTS



O. Reg. 429/07: ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

6.2 The training must include a review of the purposes of the Act and the requirements of this Regulation and instruction about the following matters:

1. How to interact and communicate with persons with various types of disability.
2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability.
4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.

7.2 "The feedback process must permit persons to provide their feedback..."

7.3 "The feedback process must specify the actions that the provider of goods or services is required to take if a complaint is received."

O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS

66.6 "provider shall ensure that the same fare payment options are available for all transportation services"

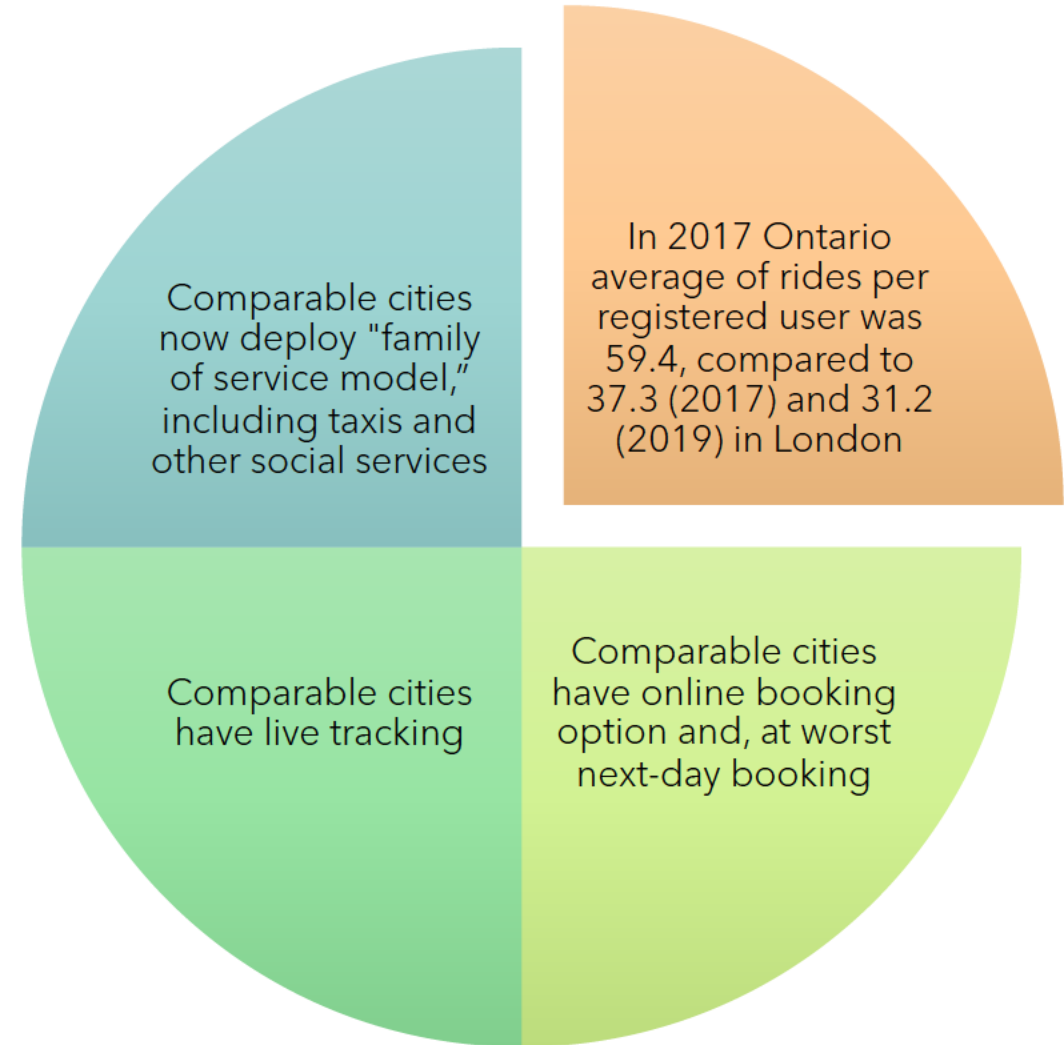
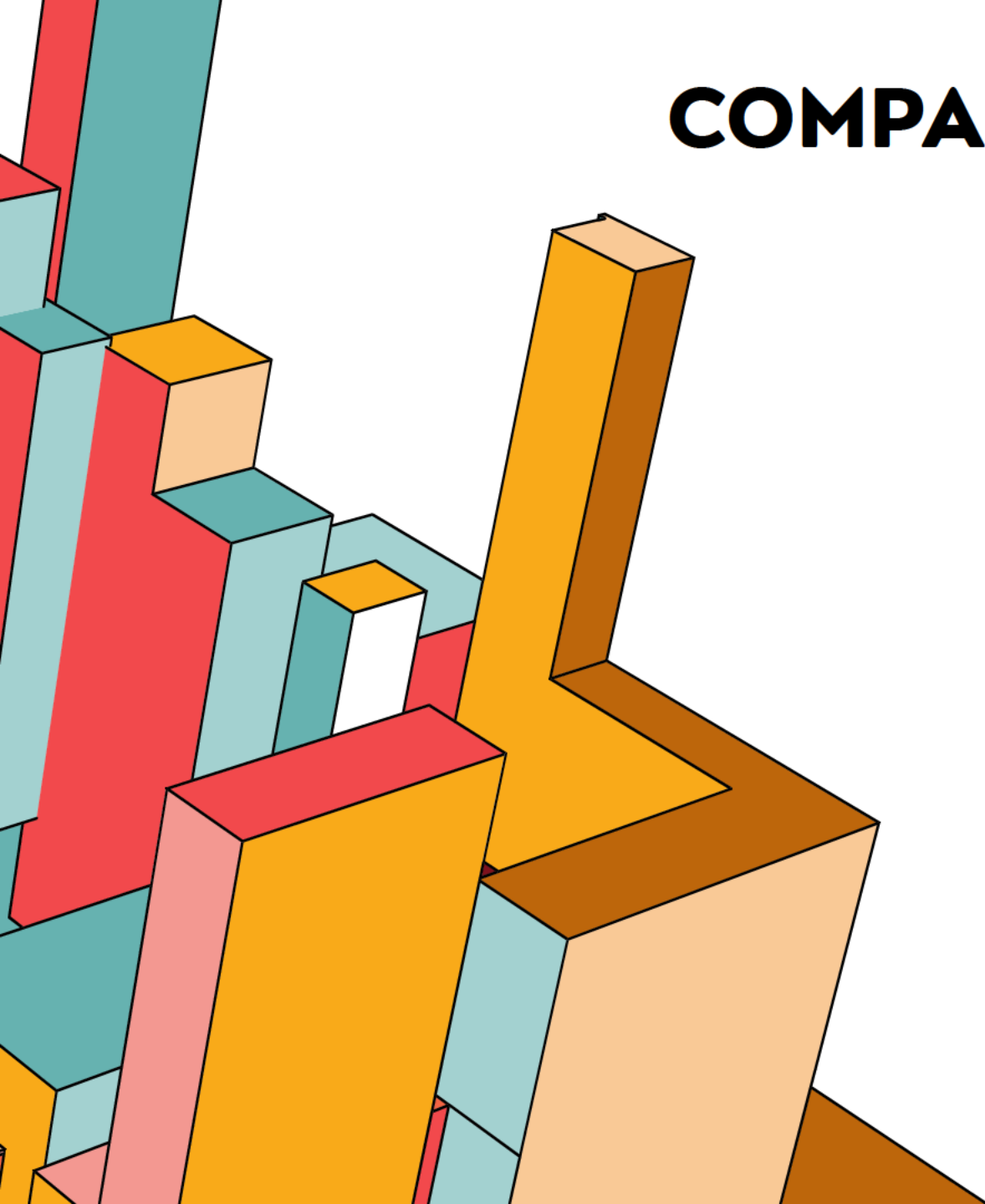
70.1 "...shall ensure that it has, at a minimum, the same hours and days of service as any one of the conventional transportation service providers"

71.1 "Provide same day service to the extent that it is available" or when not available "accept booking requests up to three hours before the published end of the service period on the day before the intended day of travel"

71.2 "shall provide accessible means to accept reservations"

73.1 "provide information on duration of service delays" (delay= 30 mins or more)

COMPARED TO OTHER SERVICES



NECESSARY REDUCTIONS



Reduce the time it takes for users to book a ride



Reduce # of users unable to book a ride



Reduce the frequency of late (+15min) or missed rides



Reduce excessive ride times due to scheduling inefficiencies



RECOMMENDATIONS

By September 2023

- Same-day booking options
- Smart card access in every bus
- Sensitivity training for drivers

By January 2024

- Online/app booking option
- Live bus tracking
- Increased efficiency so riders do not spend excessive amounts of time on the bus

4-Year Goal

- Increase ride capacity by 10% YOY

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...but only if you choose to act.

