



Accessibility for Ontarians with Disabilities Act, 2005

Annual Report 2016

The Honourable Tracy MacCharles

Minister Responsible for Accessibility, Minister Responsible for Women's Issues

On the Cover

ARTIST BIOGRAPHY

Steve Kean is a photographer originally from Sudbury, Ontario who has been living in Toronto for the past 24 years. He came to photography while in high school where he was failing art class. Kean's disability made it difficult for him to draw or paint, but he still had a burning need to create art. A camera was the answer for him. Mostly self-taught, Steve has made tens of thousands of images over more than thirty years attempting to master his craft.

Steve describes himself as both a disabled photographer and a photographer with a disability. What's the difference? Why not use just one descriptor? Well, they are not interchangeable. He identifies as a disabled photographer because he lives and creates art in a world that is not designed to accommodate him and his wheelchair. People are more comfortable with "artist with a disability." Perhaps this is because it acknowledges Kean as a person first and frames his disability a part of him rather than the world around him.

ARTIST STATEMENT

"Moving Landscapes" is my newest body of work. The images in this series are all taken from moving trains and intercity buses with an Apple iPhone. These two things together have done much to mitigate the lack of access to nature for me. And this work has allowed me to explore my roots, indeed the roots of all of us. Outside the confines of cities and free from the pollution from light and industrialization, I am free to explore and create.

Moving Landscapes explores the intersection of the natural world and the one created by man. It is an allegory of the struggle for balance between Nature and Mankind's drive for supremacy. In places, one could see where Nature is taking back what is hers; grass mixed with decaying asphalt and concrete - and the delicate grass is winning. In other places, where man has tried to hurriedly repair the damage of "construction" and the unchecked growth of the human race, things are not so elegant. Nature takes her time and that no longer seems to be in the nature of Man.

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A Message from the Minister

As we mark the 11th year of the landmark Accessibility for Ontarians with Disabilities Act (or AODA), our government remains as committed as ever to building an accessible province for people with disabilities by 2025.

This year, Ontario made history by appointing the first-ever Minister Responsible for Accessibility. I'm proud to be serving in this role, and I am very pleased to be working with Marie-Lison Fougère, Ontario's first Deputy Minister Responsible for Accessibility.

These new appointments reaffirm our government's dedication to accessibility. They have strengthened how we oversee the AODA and are helping us achieve greater accessibility and inclusion in Ontario communities and our economy.

I'm happy to report that regular reviews of existing AODA standards continue to take place. We made amendments to the Customer Service Standard and saw the launch of the Transportation Standards Development Committee.

In 2016, we also expanded our compliance footprint significantly, conducting more

compliance activities than in 2015. Now more than ever, businesses are embracing accessibility and meeting their legislative requirements.

To build on this momentum, we have also engaged in extensive outreach, including a marketing campaign and new EnAbling Change Program projects. These initiatives help inform businesses of their obligations under the AODA, increasing compliance and generating awareness of the importance of accessibility. Our government envisions a future where accessibility is ingrained in everything we do—and these programs and partnerships will help make this vision a reality.

I look forward to continuing our journey together as we move closer to an accessible Ontario in 2025.

Tracy MacCharles

Minister Responsible for Accessibility Minister Responsible for Women's Issues

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Ontario: An Accessibility Champion

When the Accessibility for Ontarians with Disabilities Act (AODA) became law in June 2005, Ontario set in motion the framework for a more diverse and inclusive society. The AODA mandates accessibility standards in key areas of daily living for every organization that provides goods, services or facilities—and sets a firm date for achieving that goal.

First to come into force was the Customer Service Standard. It requires companies and organizations to provide accessible customer service to people with disabilities and train their staff on how to serve them.

Standards that govern accessible employment, information and communications, transportation and the design of public spaces have also come into effect. All five standards are now rolled into one Integrated Accessibility Standard Regulation (IASR) to make it easier for organizations to understand their obligations.

Health pre-consultations—conducted both in-person and online—to inform the development of a new Health Care Standard were held over the summer. They involved stakeholders in the health and disability communities and their input was vital in identifying accessibility gaps and barriers in the delivery of health care.

Since the AODA was first introduced, the Accessibility Directorate of Ontario has worked with people with disabilities, businesses of all sizes, not-for-profit organizations and the broader public sector to bring Ontario's vision to life. In just a little over ten years, we have seen a dramatic shift in attitude, with more and more organizations going above and beyond the legal requirements.

But there is more work to be done.

To keep the momentum building, this year Ontario's first-ever Minister and Deputy Minister Responsible for Accessibility were appointed. It was a clear indication of the government's commitment to achieving the goal of an accessible Ontario by 2025.



Local coffee shop using an StopGap Foundation accessible ramp in Toronto, Ontario.

Businesses and non-profit organizations with 50+ employees and public sector organizations must review and update their accessibility plan at least once every five years and post it on their website if they have one. ¹

We're past the half-way mark: Important dates²

January 1, 2016 All businesses and non-profit organizations with 1-49 employees must train staff and volunteers on accessibility laws and make it easy for people with disabilities to provide feedback when asked

All public sector organizations with 1-49 employees must make public information accessible on request

Businesses and non-profit organizations with 50+ employees must make public information accessible when asked and make employment practices accessible

All public sector organizations with 1 or more employees must make new or redeveloped public spaces accessible

January 1, 2017 All businesses and non-profit organizations with 1-49 employees must make public information accessible when asked and make employment practices accessible

All businesses and non-profit organizations with 50+ employees must make new or redeveloped public spaces accessible

December 31, 2017

All businesses and non-profit organizations with 20+ employees and all broader public sector and government organizations with at least one employee must file an accessibility compliance report

Milton Public Library 3

Milton Public Library has a new resource to help make the library more accessible to people with cognitive special needs such as autism, ADHD and Asperger's. It's called MagnusCards and it's an app that was developed in partnership with MagnusMode, a Waterloo company that specializes in developing technology for various social interactions. MagnusCards combines a proven method of instruction with elements of game design to give library users step-bystep directions on how to navigate their library visit, from registering for a library card to returning library items. "It gives a group of people who are often invisible the same level of independent use as everyone else by letting them access services without having to interact with library staff if they don't want to," says Mark Williams, deputy chief librarian.

Launched in April 2016 to mark National Autism Awareness Month, the app has proved to be highly successful. Milton has re-subscribed for another three years and other libraries across Ontario are signing on as well.

Strengthening the AODA

The Ontario government is working hard to ensure that accessibility standards are working as intended. That's why a regular review of every accessibility standard is written right into the AODA. Each standard is carefully reviewed every five years by a Standard Development Committee to determine whether it requires adjustments. At least 50% of a committee's members are people with disabilities.

As a result of a comprehensive review of the Customer Service Standard—the first to come into force—a number of amendments were made in 2016.

Effective July 1st:

- the Customer Service Standard—together with the other four accessibility standards—became part of the IASR, making it easier for organizations to understand their obligations and comply with them
- all members of an organization—not just those who deal directly with the public—must be trained on accessible customer service
- more types of regulated health professionals—including psychologists, psychotherapists, audiologists and optometrists —can provide documentation on the need for a service animal
- in certain cases, an organization can require a support person to accompany someone with a disability for health or safety reasons but only after consulting with the person, and if a support person is required, their fee or fare—if one exists must be waived
- private sector and non-profit organizations with 20-49 employees no longer need to document their accessible customer service policies or make them public (compliance and reporting requirements remain in effect)

To help organizations meet their obligation to provide accessible customer service, the Accessibility Directorate has developed an accessible customer service policy template. ⁴

Businesses and non-profit organizations with 50+ employees and all public sector organizations must put their accessible customer service policy in writing and make it publicly available. They must also provide their policy in accessible format or with communication support on request. 5



Transportation Standards Development Committee, November 17, 2016: (left to right) back row: Gary Malkowski, Sarah Keenan, Eve Wiggins, Dana Earle, Robert Gaunt, Kelly Paleczny (Chair), Steve Murphy, Tracy Schmitt, James Bisson; front row: Sam Savona, Sue Morgan, Nicole Cormier, Antonia Hammer.

Also in 2016, the Transportation Standard Development Committee began its review. The Committee is made up of transit providers, municipalities, and individuals with disabilities and is supported by the Accessibility Directorate of Ontario, the Ministry of Transportation and the Ministry of Municipal Affairs.

The Committee was asked by the Minister to discuss specific transportation focus areas including:

- conventional transportation (e.g., buses, trains, subways)
- specialized transit (e.g., paratransit services)
- the duties of municipalities that license taxicabs
- new and emerging technologies
- shared economies
- inter-jurisdictional transit issues

The Committee met six times in 2016 and submitted its first report to the Minister on November 25, 2016, outlining recommendations for changes to the standard. The initial report is posted on our website and we encourage constructive public comment. ⁶

There were also changes to the Accessibility Standards Advisory Council (ASAC). 2016 was Rich Donovan's first year as Chair, and four new members were added to the Council. The Council provides high-level strategic advice to the Minister on matters related to implementing the AODA—and promoting a culture shift to move beyond it. ASAC met five times in 2016 and provided valuable input on upcoming standard development committee reviews. Members of the disability community and organizations that are required to comply with Ontario's accessibility laws are encouraged to apply to sit on ASAC. ⁷

ASAC also provided advice on the development of the new Health Care Standard and a new Employment Strategy for People with Disabilities. Additionally, on December 5, 2016, Premier Kathleen Wynne made a public commitment to develop a new accessibility standard for education.



Accessibility Standards Advisory Council, July 27, 2016: (left to right) back row:
Josephine Ho, Ann Hoy (Assistant Deputy Minister), Don Halpert, Dean Walker, Minister Tracy MacCharles,
Serge Falardeau, Scott Allinson, Kelly Paleczny, Lois Davies, Michelle Saunders; front row: Dean Mellway,
Jane Arkell, Pina D'Intino, Rich Donovan (Chair), Kevin Shaw and Sam Savona

Promoting Accessibility

Outreach/Education Initiatives

The Directorate is responsible for ensuring that businesses and organizations across the province understand the benefits of accessibility and their legal requirements under the law.

In 2016, we continued to reach out to employers through a wide range of initiatives, including:

- 6 e-newsletters
- 37 face-to-face presentations
- 56 trade show exhibits
- 27 webinars
- 13,000+ telephone helpline inquiries
- 3,400 emails
- 11,688 engagements on Twitter and Facebook

We launched a new monthly newsletter called the AODA Toolbox. ⁸ Distributed to more than 6,000 subscribers, it contains important accessibility information, including:

- current and upcoming accessibility requirements and deadlines
- tools and resources to help organizations comply
- upcoming webinars and events

We also introduced a new quarterly newsletter, On the Path to an Accessible Ontario, which highlights our new accessibility initiatives. ⁹



Directorate staff attend events across Ontario to engage the public about accessibility issues and promote awareness.

Also this year:

Employment Standard Marketing Campaign

We began a two-phase marketing campaign focused on the Employment Standard. Phase one, which ran from December 14, 2015 to March 31, 2016, targeted large businesses and non-profits with 50+ employees. Phase two began on October 31, 2016 and is directed at small and medium-sized businesses. The campaign, which uses direct mail, print, radio and online ads, and office elevator screens, reminds businesses of the deadlines for compliance. Phase one was highly successful in driving visitors to the government webpage for accessibility information, and encouraging businesses to take advantage of the free resources and templates. ¹⁰



Employment Standard marketing campaign advertisement

Summer Student Outreach Program

We ran a Summer Student Outreach Program. A team of three students travelled throughout Ontario attending conferences, community events and festivals, engaging employers and spreading the word about the January 1, 2017 compliance deadline for new requirements. Over 16 weeks, the students attended 22 events and interacted with over 9,000 people, including 100+ employers from organizations spanning a broad range of sectors and sizes. The employers received the students' accessibility message with enthusiasm, many of them saying they were updating their accessibility policies to meet AODA requirements.



Summer student handing out resources at the accessibility booth at an outdoor festival in Kitchener-Waterloo

As well, the Directorate supported and participated in a number of events in 2016—both at home and abroad—reinforcing our leadership in building an inclusive society. These included:

4th annual Access Israel Conference 11

The theme of the 2016 conference was accessible tourism, transport, culture and leisure. Seven hundred participants from around the world took part, including: travel agents, tour guides, managers of museums and culture institutions, hoteliers, managers of airlines and transport companies, accessibility professionals, architects, designers and engineers and delegates of local and state authorities. Assistant Deputy Minister, Ann Hoy, was invited to speak about Ontario's experience in building an accessible province. Other speakers included: Daniela Bas. Director of the UN Division for Social Policy and Development (DSPD), Anna Grazia Laura, President of the European Network for Accessible Tourism (ENAT) and Victor Calise, New York City's Accessibility Commissioner.



Assistant Deputy Minister Ann Hoy delivering a speech at the 4th Annual Access Israel Conference Photo courtesy of Keren Kayemeth,

Lelsrael Jewish National Fund

The Ontario Leaders in Accessible Employment Award

This award honours a business or organization that has created an accessible work environment, values the contribution of persons with disabilities, and promotes the development of an inclusive workplace culture. ¹² In 2016, Minister MacCharles presented the award to Hillside Haven Retirement Residence of Campbellford. The runner-up was the YMCA of Hamilton/Burlington/Brantford.



Winner of the Ontario Leaders in Accessible Employment, Hillside Haven Retirement Residence talking at the Winners Lounge at the Ontario Business Achievement Awards

Disabilities Mentoring Day 13

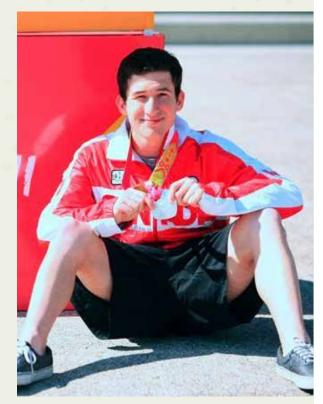
Now in its sixth year, we also provided support for this one-day event, organized by Dolphin Digital Technologies and their local community partners, that aims to put job-ready candidates with disabilities together with potential employers and it is attracting more participants every year. In 2016, 102 mentors and their respective 102 mentees participated in six cities across the province, with a number of mentees securing employment.



2016 Disabilities Mentoring Day meet and greet in Kingston, Ontario. - *Photo courtesy of Emily Burton.*

Perspectives on Accessibility in Sport webinar

On March 10, 2016, 430 people from all over the globe took part in the Directorate's free international webinar on the importance of accessibility and inclusion in sport. The focus was on Ontario's approach to the highly successful 2015 Pan/Parapan AM Games, and lessons learned about the impact of inclusive sport on the health and well-being of marginalized populations. Speakers—all leaders in the field of inclusive sport—included: Alfred Spencer, Director of Outreach and Strategic Initiatives at the Accessibility Directorate; Karen O'Neill, CEO of the Canadian Paralympic Committee; Vicki Keith, Canadian marathon swimmer; Chris Sergeant-Tsonos a competitive para-athlete; and Scott Mitchell, Director of Knowledge Transfer at the Canadian Mental Health Association, Ontario.



Guest speaker at Perspectives on Accessibility in Sport webinar, Chris Sergeant Tsonos

Partnerships: EnAbling Change Program

EnAbling Change is a strategic partnership program that provides funding and expertise to incorporated non-profit organizations that educate an industry or sector about accessibility requirements and promote accessibility.

2016 saw the launch of 22 new projects, with priority given to those that addressed:

- compliance assistance
- education and inclusion
- the business case for accessibility
- promotion/distribution of resources to help small and medium size businesses meet the 2017 reporting deadline

Among the projects funded in 2016 were:

Enabling Minds:

Developed by the Canadian Mental Health Association of Ontario, Enabling Minds is a 45-minute, online training course on accessible customer service aimed at people who work in sports, fitness or recreation. ¹⁴ The course includes information on how to recognize and remove barriers to physical activity programs for people with mental health disabilities and how to create a supportive and inclusive environment that promotes positive mental health for everyone.

The Directorate thanks all of our 2016 partners for their contributions:

- Bio-Talent Canada
- Canadian Abilities Foundation
- Canadian Manufacturers and Exporters
- Canadian Marketing Association
- Conference Board of Canada
- Council of Ontario Universities
- Design Exchange
- Electricity HR Canada
- Institute on Governance
- Learnography
- Miles Nadal Jewish Community Centre
- OCAD University
- Ontario Public School Boards Association
- Ontario Restaurant, Hotel and Motel Association
- Ontario Soccer Association
- · Retail Council of Canada
- Ryerson University
- Trucking HR Canada
- StopGap Foundation
- United Way Ottawa

ReelAbilities Film Festival:

Held in Toronto May 12-19, 2016, the festival showcased the lives, stories and art of people with disabilities and deaf people. 15 The first of its kind in Canada, it was accessible to audience members of all abilities. All films had open captioning/subtitles and selected screenings were sensory friendly (lower volume and dimmed theatre lights). Venues were wheelchair accessible, companion seating was available free of charge, and service animals were welcomed. Panel discussions were supported by American Sign Language and Computer Assisted Real Time Transcription (CART). Following the festival, the Miles Nadal Jewish Community Centre incorporated its experiences of organizing an accessible film festival into a short guide, "ReelAccess: A Guide to Accessible Film Festivals and Screenings." 16 Available in English and French, the guide offers tips and resources on accessibility for people with disabilities so the magic of cinema can be available to everyone.

Opening night film screening at the ReelAbilities Film Festival in Toronto, Ontario - Photo Courtesy of: Louis Thomas for Miles Nadal Jewish Community Centre



AccessForward Customer Service Standard Training Module:

This online training module, developed by Learnography (formerly known as Curriculum Services Canada), covers everything an organization needs to know about providing accessible customer service—including their legal obligations and why it is important. It is offered free of charge. ¹⁷



AccessForward Customer Service Standard Training Module

StopGap Foundation 18

In 2016 the Accessibility Directorate of Ontario began a project with the StopGap Foundation to pilot a model in five Toronto elementary schools to raise awareness about accessibility and inclusion.

StopGap will develop lesson plans and resources for teachers to assist students in reaching out to local business owners with single-stepped entryways to explain the importance of storefront that everyone can access. The project will enable each school group to provide up to five ramps in their community to interested business owners.



Luke Anderson giving a class presentation as part of the School Ramp Project Photo courtesy of StopGap Foundation

Enforcing the Standards

With five accessibility standards now in place, the Directorate is busier than ever, working with organizations across the province to ensure they meet their requirements under the law.

In 2016, with momentum continuing to build toward 2025, we expanded our compliance footprint, conducting more compliance activities than in 2015. These included 1,604 activities where we worked with organizations that either didn't file an accessibility compliance report or reported that they were not in compliance, as well as auditing organizations that reported full compliance.

We also piloted a third-party compliance project, which ran between May and November 2016. It was very successful, with nearly 500 audits conducted. What we learned from the pilot will inform the Directorate's internal compliance assurance work and potential future compliance projects. ¹⁹

An audit blitz targeted at the hospitality sector took place this year to complement our other compliance initiatives. It looked at two specific requirements of the Employment Standard for accessibility: both the need for notification of accommodations throughout the recruitment process, and during the hiring process.

Through our call centre, we handled more than 13,000 calls, providing one-on-one assistance to thousands of organizations and followed up on compliance issues.



Enforcement action can be taken against organizations that don't file an accessibility compliance report. ²⁰

Compliance officer keeping track of 2016 compliance activities.

Marilu's Market

Twenty years ago, Marilu's Market co-owner Mario Antico was approached by a local high school to see if he would offer co-op placements to students with intellectual disabilities. He didn't hesitate. Since then, his Burlington gourmet grocery store has provided dozens of special needs students with real work experience. "The program has been well received by everyone involved," he says. "The students gain confidence and skills. The staff enjoy training and working with them. And the customers are happy as well." In fact, a number of students have come back looking for work and one former co-op student got a full-time job and worked at the store for 15 years. In 2015, Marilu's Market was recognized for its accessibility leadership with a City of Burlington Accessibility Award in the employment category. Says Antico, "It's been rewarding to see the difference we've made in so many kids' lives. It's something every business should think about doing."

"It's been rewarding to see the difference we've made in so many kids' lives. It's something every business should think about doing."

Marilu's Market in Burlington, Ontario





Special Advisor, Mr. David C. Onley

David C. Onley

In the second full year of his mandate as Special Advisor, Mr. Onley focused on three core priorities: helping to shift culture to create a more inclusive society, helping the private and public sector see the benefits of hiring more people with disabilities, and advising the government on how to be a leader in accessible policies and programs.

Mr. Onley was able to increase public awareness of accessibility and disability issues by participating in a number of conferences, public events and media appearances. He was also able to bring new voices into the government decision-making processes, as well as his own perspectives on a number of government policies that relate to accessibility.

Selected accomplishments include:

- completing a media relations campaign that reached nearly six million
 Ontarians in 26 markets, detailing the benefits of hiring people with
 disabilities and debunking many myths and misperceptions that
 employers and the public sometimes have;
- providing keynote/guest speaker remarks at 12 conferences, reaching approximately 1,600 people in five cities;
- generating media coverage for the annual David C. Onley Awards for Leadership in Accessibility by providing guest speaker remarks at awards event and presenting awards to three individuals and eight organizations from across Ontario; ²¹
- consulting with 23 external organizations from private, public and not for profit sectors to hear concerns about accessibility issues;
- providing advice and report-back of stakeholder comments to both Minister Duguid and Minister MacCharles;
- participating in five all-day sessions as part of the joint working group to establish an Employment Strategy for People with Disabilities;
- serving as Honorary Chair of the Champions League, coordinated by the Ontario Disability Employment Network (ODEN) and facilitating meetings of this group of business leaders committed to increasing employment for people with disabilities.

Looking forward to 2017

In 2017 we will hit some important milestones on our path to an accessible Ontario by 2025.

On January 1, 2017, all organizations with 1-49 employees will be required to provide accessible formats and communications supports for information upon request, and make their employment practices accessible as well.

All organizations with 50+ employees will need to make new or redeveloped public spaces (e.g., trails, beach access routes, outdoor eating areas) accessible.

For the first time, organizations in all sectors will have to submit their accessibility compliance reports in the same year. By December 31, 2017, businesses and non-profits with 20+ employees, as well as all public and government sector organizations with at least 1 employee will need to file an accessibility compliance report.

Over the next 20 years, people with disabilities will form 40% of Ontario's consumer base. ²²

2016 Accessibility Innovation Showcase 23 24

On May 9-10, 2016, the Directorate, in partnership with the Ontario Centres of Excellence, hosted the second Accessibility Innovation Showcase and Tech Pitch Competition. Thirty-five Ontario-based companies exhibited their accessibility-focused innovations, promoting awareness of advancements in this growing market and putting companies together with potential private investors. Five of the Showcase companies were invited to pitch their innovations to a panel of judges that included members of the investment community and leaders in accessibility. At stake? A \$20,000 prize. The winning company was iMerciv, a startup based at the University of Toronto's Impact Centre. Its BuzzClip is a discrete wearable for people living with vision loss that uses ultrasound to detect obstacles in the user's path, allowing for safe navigation



2016 Accessibility Innovation Showcase Tech Pitch Competition winner—iMerciv Photo courtesy of: Ontario Centres of Excellence

around them. The award money went toward completing the manufacturing of the device and getting the necessary certification. The BuzzClip is in the process of being sold and distributed in Canada and the U.S.

Innisfil Accessibility Advisory Committee 23

In 2001 it became law for Ontario municipalities with 10,000 or more citizens to establish local accessibility advisory committees. The role of the committee is to work with their municipal councils to identify and break down barriers for people with disabilities in their own communities. Innisfil, a town of about 35,000 located on the western shore of Lake Simcoe, embraced the idea whole-heartedly. From the start, its eight member committee has been creative—and relentless—in its pursuit of an accessible community. There was the "Paint the Town Yellow" campaign to make sure Innisfil's curbs are visible to people with disabilities. The "Disabled for a Day" program, an awareness program for elementary schools, highlights the benefits of accessibility for people of all abilities. There is also an accessible garden at the community centre. In June, 2016, the committee and the town were recognized for their forward thinking with a David C. Onley Champion Award for leadership in accessibility. "We're proud to be leading the way to an accessible Ontario," says committee member Rick Winson.

Accessible bench in Innisfil, Ontario



To help organizations meet their obligations, the Directorate will:

- enhance our education and outreach efforts to help employers understand and implement their accessibility requirements
- introduce a new, simpler compliance reporting process in March 2017

We will also:

- ask for public comment on the Transportation Standard Development Committee's initial recommendations
- support the development of a Health Care Standard
- review the Employment Standard and the Information and Communications Standard
- develop a new Employment Strategy for People with Disabilities
- launch a survey to gather information for early work on an Accessible Standard for Education

And, finally, we will advance the business case for accessibility at every opportunity. Because accessibility is not just the right thing to do, it's the smart thing to do, as thousands of organizations across Ontario have already discovered.

To succeed in the 21st century, Ontario is going to need to harness the talents of all of its citizens. People with disabilities represent a talented labour pool that can fuel growth across Ontario's economic sectors.

Notes:

- 1. https://www.ontario.ca/page/how-create-accessibility-plan-and-policy
- 2. https://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits
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- 25. Approved by Rick Winson, committee member, by email, March 7, 2017



ontario.ca/accessibility

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