



Accessibility Plan

September 2003

TABLE OF CONTENTS

I.	Executive Summary	Page 1
II.	Legislative Framework and Definitions	Page 2
III.	London Transit Profile – Conventional and Specialized Services	Page 4
IV.	Initiatives to Date to Identify and to Address Accessibility Issues	Page 9
V.	The Year 2003 Achievements	Page 13
VI.	Plan Approval and Communication Strategy	Page 14
VII.	Methodology for Conducting the Review	Page 15
VIII.	Identified Barriers and Time-phased Action Plan	Page 17
IX.	Conclusion and Next Steps	Page 21

SECTION I - EXECUTIVE SUMMARY

This report serves as London Transit Commission's Accessibility Plan in conformance with the requirements of the Ontarians with Disabilities Act ("ODA").

The London Transit Commission is committed to:

- the continuous development of accessible public transit services;
- working toward ensuring its facilities are barrier free;
- working toward providing barrier free employment and employment opportunities; and
- establishing communication services that respect the abilities of all customers, employees and the public at large.

The development of the Accessibility Plan is the latest in a series of steps advancing to the principle of full accessibility in service, facilities, employment and communication undertaken by London Transit since 1992. The steps taken to date have seen significant improvements in accessibility for both conventional and specialized transit services in the ultimate goal of providing fully accessible public transit services.

Notwithstanding the steps taken to date and that extensive community consultations were undertaken in developing the Plan, the Plan and resulting initiatives continue to be a work in progress in terms of barrier identification, establishment of action plans to remove those barriers and education and policy development to prevent future barriers. The Plan will be reviewed and updated on an annual basis. The related action plans will form part of London Transit's Business Plan and will be incorporated in annual work programs and the related operating and capital budget programs. Linking the accessibility plan initiatives to the LTC business planning process provides the mechanism to not only chart progress, but to also identify, remove and prevent barriers and safeguard against new barriers being created.



R. Loveless
Chair, London Transit Commission
September 2003

SECTION II - LEGISLATIVE FRAMEWORK AND DEFINITIONS

The Ontarians with Disabilities Act, proclaimed to address the broader public sector in September 2002, sets out the following requirements for public transportation organizations such as LTC:

Section 14 of the Act requires public transportation organizations to:

- prepare an Accessibility Plan; and
- consult people with disabilities and others when it prepares its Plan.

The initial Plan must be prepared and communicated by September 30, 2003.

The Plan content is to include:

- addressing barriers to people with disabilities, and ways to remove and prevent them, in the organization's by-laws, policies, programs, practices and services, this includes:
 - a report on the measures the organization has taken to identify, remove and prevent barriers to people with disabilities;
 - the measures in place to ensure that the organization assesses its proposals for by-laws, policies, programs, practices and services;
 - a list of by-laws, policies, programs, practices and services the organization will review in the coming year to identify barriers;
 - how the organization intends to identify, remove and prevent barriers in the coming year; and
 - all other information required by the regulations.

Further, the public transit organization must make the Accessibility Plan available to the public.

Definitions

Definition of "Disability"

The ODA covers the same broad range of disabilities as does the Ontario Human Rights Code. These include physical, sensory, cognitive, developmental and mental disabilities, and brain injury. Section 2 of the ODA defines "disability" as:

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997 ("handicap").

Definition of "Barrier"

A "barrier" is anything that stops a person with a disability from fully taking part in society because of that disability. Some barriers include:

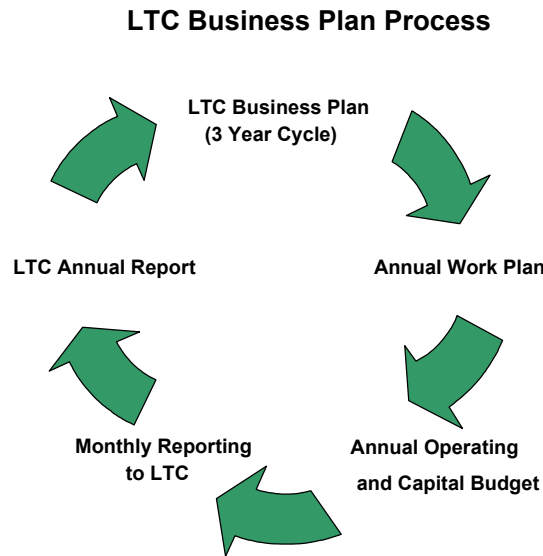
- physical barriers, for example a step at the entrance to a store;
- architectural barriers, for example no elevators in a building of more than one floor;
- information or communication barriers, for example a publication that is not available in large print;
- attitudinal barriers, for example assuming people with a disability can't perform a certain task when in fact they can;
- technological barriers such as traffic lights that change too quickly before a person with a disability has time to get through the intersection; and
- barriers created by policies or practices, for instance not offering different ways to complete a test as part of job hiring.

SECTION III - PROFILE OF LONDON TRANSIT COMMISSION

The Commission is the agent of the City of London responsible for the operation, repair, control and management of the local transportation system of the municipality on behalf of the City of London. This includes both conventional and specialized transit services. The latter service is designed to meet the range of needs of the citizens of London who have a disability which prevents them, on a regular basis, from being able to use London's regular, fixed route transit service. The Commission's authority to operate is provided under the City of London Act. The Commission (Board of Directors) is a five person board appointed by Municipal Council. The Commission sits for a three year term concurrent with the term of Municipal Council.

The short and medium term orientations for LTC are set out in its Business Plan. The Business Plan provides for the establishment of performance targets, preparation of annual budget, development of related annual work plan programs and the preparation of the annual performance report. The business planning process supports managed change, identifies challenges and expectations and builds upon success through continuous improvement. The Business Plan is updated every three years.

The business planning process is depicted below.



Conventional Services - Service Profile

Type of service	Fixed route - modified radial service										
Hours of service	<table border="0"> <thead> <tr> <th><u>Day</u></th> <th><u>Times</u></th> </tr> </thead> <tbody> <tr> <td>Monday to Friday</td> <td>6:00 a.m. to 12:00 p.m.</td> </tr> <tr> <td>Saturday</td> <td>6:00 a.m. to 12:00 p.m.</td> </tr> <tr> <td>Sunday</td> <td>8:30 a.m. to 11:00 p.m.</td> </tr> <tr> <td>Statutory Holiday</td> <td>8:30 a.m. to 11:00 p.m.</td> </tr> </tbody> </table>	<u>Day</u>	<u>Times</u>	Monday to Friday	6:00 a.m. to 12:00 p.m.	Saturday	6:00 a.m. to 12:00 p.m.	Sunday	8:30 a.m. to 11:00 p.m.	Statutory Holiday	8:30 a.m. to 11:00 p.m.
<u>Day</u>	<u>Times</u>										
Monday to Friday	6:00 a.m. to 12:00 p.m.										
Saturday	6:00 a.m. to 12:00 p.m.										
Sunday	8:30 a.m. to 11:00 p.m.										
Statutory Holiday	8:30 a.m. to 11:00 p.m.										
Annual passenger trips	16.4 million										
Annual revenue service hours	490,000 hours										
Annual kilometers	10.4 million										
Number of routes	34 routes, plus 3 community bus operations										
Types of services	<p>Mainline Downtown – 10 routes – 6 of which are designated low floor bus accessible</p> <p>Mainline Crosstown – 4 routes</p> <p>Downtown/Suburban – 9 routes, 7 of which are designated low floor bus accessible</p> <p>Feeder/local – 9 routes, 1 of which is designated low floor bus accessible</p> <p>Community Bus – 3 routes, all of which are designated low floor bus accessible</p>										
Fleet makeup	- Approved fleet size equals 178 buses of which an estimated 89 will be low floor accessible by December 31, 2003										

Conventional Services - Customer/Client

Conventional transit services are available to all Londoners. Currently an estimated thirty plus percent of Londoners use public transit in the course of the year. Some may use the service only occasionally, while others use the service extensively. The following tables set out the frequency of use by our customers, the make up of the ridership and trip purpose. The Frequency of Use table clearly indicates that ridership is by no means captive, with some 50% of customers using the service, on average, less than four times per week. The Ridership Makeup and Trip Purpose tables reflect the diversity of the ridership and the role trip purpose has in supporting a sustainable community.

Frequency of Use	
Trips per Week	Percent Make up
Up to 1	23%
2 to 4	27%
5 to 8	19%
9 or more times	31%
	100%

Ridership Make up	
Description	Percent Make up
Adult	52%
Post secondary students	34%
Students (Grade 7 to OAC)	9%
Seniors	4%
Child	1%
	100%

Trip Purposes	
Description	Percent Make up
Work	32%
School	21%
Shopping, Medical, Other-recreational, etc.	47%
	100%

Profile of Specialized Transit Services

Type of Service	-	Shared Ride – Door to Door – Pre Booked Service										
	-	Registrants are able to book trips 3 days in advance. Trips, with the exception of subscription trips, are awarded on a first come first serve basis. There is not a guarantee of trip availability										
Hours of Service		<table><thead><tr><th><u>Day</u></th><th><u>Time</u></th></tr></thead><tbody><tr><td>- Monday to Friday</td><td>7:00 a.m. to 11:30 p.m.</td></tr><tr><td>- Saturday</td><td>8:30 a.m. to 11:30 p.m.</td></tr><tr><td>- Sunday</td><td>8:30 a.m. to 11:30 p.m.</td></tr><tr><td>- Statutory Holiday</td><td>8:30 a.m. to 11:30 p.m.</td></tr></tbody></table>	<u>Day</u>	<u>Time</u>	- Monday to Friday	7:00 a.m. to 11:30 p.m.	- Saturday	8:30 a.m. to 11:30 p.m.	- Sunday	8:30 a.m. to 11:30 p.m.	- Statutory Holiday	8:30 a.m. to 11:30 p.m.
<u>Day</u>	<u>Time</u>											
- Monday to Friday	7:00 a.m. to 11:30 p.m.											
- Saturday	8:30 a.m. to 11:30 p.m.											
- Sunday	8:30 a.m. to 11:30 p.m.											
- Statutory Holiday	8:30 a.m. to 11:30 p.m.											
Registrants	-	2,000										
Annual eligible passenger trips	-	146,000										
Attendant/companion trips	-	13,000										
Annual service hours	-	72,000 - includes both primary and secondary service providers										
Fleet requirements	-	Fleet requirements are provided by primary and secondary service providers. The primary service provider operates 21 vehicles, while the number of vehicles provided by the secondary service provider corresponds directly to demand and budget.										
Service Administration	-	Service booking - handling in excess of 200,000 calls annually for trip booking, cancellations, etc.										
	-	Service scheduling - providing daily schedules for primary and secondary service providers consisting of between 20 and 25 vehicles per day during peak periods and providing 146,000 plus trips on an annual basis.										
	-	Dispatching service – deals with “real time” monitoring of service.										

Customer/Client:

Specialized transit services are available to all residents of the City of London meeting the varying eligibility criteria. There are currently approximately 2,000 registrants of the service. The London Transit's specialized transit services provide transportation for persons with a disability who are (or may be) unable to use London's regular fixed-route bus service for some or all of their trip requirements.

Of the 2,000 registrants, approximately 50% utilize a mobility device (defined as wheelchairs or scooters) with the remaining 50% considered to be ambulatory, noting they may use a walker, cane or other similar devices. A number of the registrants require an attendant when travelling on the service. As indicated, attendant/companion travel totals an estimated 12,900 trips on an annual basis.

Given the pre-booked nature of specialized transit service, all trips booked on the service are not taken. On average, annual completed trips represent 84% of all trips booked. Of the remaining 16%, approximately 14% of the trips are cancelled and the remaining 2% are “no shows”.

The majority of specialized service riders would be considered “captive” in nature, unique to the service eligibility. Trip purpose particulars are, for the most part, similar in nature to that of conventional transit customers. A summary of trip purpose is set out in the Trip Purpose table below.

Trip Purposes	
Description	Percent Make up
Medical	30%
Work related	27%
School	15%
Other – (shopping, recreational, etc)	28%
	100%

London Transit continually monitors key indicators to assess on an ongoing basis the level and quality of service being provided. These measures include late pick-ups, trips of over 60 minutes, average trip time, and unaccommodated rides. The monitoring represents part of the ongoing assessment of service performance which, in turn, provides for measured improvements. In making improvements to the service, two principles are considered and balanced, i.e. impact or need for resources and the impact on other performance indicators, noting many of the indicators are competing in nature, e.g.:

- relaxing cancellation policy impacts trip availability
- reducing time on vehicle (i.e. more direct trips) impacts number of available trips

SECTION IV - INITIATIVES TO DATE TO IDENTIFY AND TO ADDRESS ACCESSIBILITY BARRIERS

i) 1992 - Full Accessibility Goal

In September 1992, the London Transit Commission established a goal of full accessibility to its transit services for all citizens of London.

ii) 1994 - Accessible Service Plan

In May 1994, consistent with the September 1992 full accessibility goal, the London Transit Commission adopted London Transit's first Accessible Service Plan. The 1994 Plan addressed a number of issues, including:

- a program to move toward accessible conventional buses, beginning with specific routes and with an eventual goal of fleet conversion to accessible "low floor", wheelchair securement style buses (by December 31, 2003, 89 of the approved fleet of 178 vehicles in service will be low floor accessible). Currently 10 routes are designated as accessible and a further 10 routes have had the bus stops upgraded. By the fall of 2003, a further 7 routes will be designated as accessible, bringing the total to 17 or approximately 45% of total routes;
- compiling an assessment of stops and shelters, again commencing with high priority stops such as those along accessible routes and in transfer terminals (discussed in more detail below). By September 2003, approximately 75% of the stops will have been upgraded to meet accessibility standards. There are a total of 2,100 stops in the system;
- employee training to ensure that all front line employees have the necessary knowledge to assist riders with disabilities to use accessible conventional transit. Accessibility awareness and sensitivity training was delivered to all employees and was included as part of training program for new employees; and
- co-ordination with City of London and other agencies on issues such as site planning, stop and shelter criteria and snow removal at stops;

iii) 1997 - Paratransit Responsibility

In 1997, London Transit assumed full responsibility for the delivery of specialized transit service. In 1998, the Commission established a brokerage operation to operate the service. The brokerage is responsible for call taking, customer service, scheduling and dispatching and primary and secondary service providers provided vehicles and drivers. Since 1998, under the brokerage operation, eligible passenger trips have increased from 122,000 to 146,000. In addition, other policy changes have been adopted, e.g. reducing booking window from 7 to 3 days, all of which balance providing more trips, service quality and resource availability.

iv) 1998 - Policy Framework- Human Rights Policy

In 1998, the London Transit Commission adopted a Human Rights Policy which incorporated the City of London's Diversity Policy. The Human Rights Policy provides that London Transit believes that each person has the right to live, work, receive services and participate fully, free from discrimination on the basis of any of the prohibited grounds. This statement provides an overall policy framework which is linked to the development of specific policies with respect to individuals with disabilities. This framework is applied proactively, in terms of policy, procedure and service development activities and also reactively in terms of dealing with situations which arise wherein the need for accommodation is a requirement.

v) 1998 - Specialized Service – Customer Surveys

Beginning in 1998, and repeated every two years, the registrants of the specialized transit service are surveyed to determine their overall satisfaction with various aspects of the service as well as service expectations. In addition to specific questions about the service, respondents are given the opportunity to list aspects of the service they would like to see improved, as well as the aspects of the service they like the best. The surveys have resulted in several policy and procedural changes to the service. For example, the booking window was shortened from seven days to three days in 1999. Further, in the 2002 survey, respondents identified the following as being most important:

- on-time reliability (50%)
- trip availability (36%)
- and length of time on vehicle (14%)

The information has been used when setting system parameters and determining where budget monies should be allocated (i.e. more service versus a more reliable service). The survey is completed and will continue to be completed on a bi-annual basis.

vi) 2002 Get on Board Program

The Get on Board Program, introduced in June of 2002, was designed to encourage, through a training and familiarity program, the use of accessible conventional transit by eligible registrants of the specialized service. Further, the program provided training support for applicants deemed ineligible for the specialized service. The program is listed in the Accessibility Directorate's website as a best practice.

As an incentive, trips on the accessible conventional service were provided free for the target customers and one companion, during off-peak hours (9:00am – 2:00pm and 6:00pm – 12:00am) on weekdays, and all day on weekends and statutory holidays. At peak times on weekdays, the customer paid the prevailing fare.

The program had two principle objectives:

- to support increased opportunity for travel and access to the community by designated individuals, addressing in part the latent demand for specialized transit services; and
- to relieve pressure on the specialized transit service, freeing up resources to be used to support other forms of specialized transit services and/or meet increased demand for the service.

The program has been extremely successful, resulting in approximately 24,700 trips being taken on London's accessible conventional transit service by specialized transit service registrants. These trips may have otherwise been provided by or requested for the specialized transit service. The program has received a positive response from the community as indicated by the following:

- 55% of pass holders had never tried accessible conventional transit prior to having the pass
- 89% of customers that made use of the pass indicated their experience on the accessible conventional transit service was good to excellent
- 60% of the trips provided on the accessible conventional service were reported by customers as being trips in addition to those normally taken on the specialized service

vii) 2002- Eligibility Review for Specialized Service

In 2002, London Transit Commission undertook a review (through public consultations) of the eligibility for Specialized Service. The following principles were adopted by the Commission to guide the undertaking:

- There will always be a need/requirement for some form of specialized public transit services for those persons unable to use conventional public transit services (including accessible conventional transit).
- Eligibility for specialized public transit service should be determined not only on the basis of a type of disability, but also according to the type of functional limitations that result from the disability. Specialized transit services are intended for those who fall within the definition of disability according to the Ontario Human Rights Code and are not able to use conventional transit services, accessible or otherwise, because of that disability.
- Specialized transit services are to be viewed as complementary to accessible conventional public transit service. This requires ensuring as many of the disabled population as possible are able to use accessible conventional transit services.
- The nature, design and delivery of specialized public transit service will need to reflect the needs of those it is intended to serve based upon defined eligibility criteria which, in all likelihood, means the service will be different than what we now know.
- The development of accessible public transit services (specialized and conventional) is to be predicated on the principle of integration.

- While recognizing diverse and potentially competing community expectations, development of accessible public transit services requires a balance between fiscal realities and obligations under the Ontarians with Disabilities Act and the Ontario Human Rights Code.
- Development of specialized transit services requires partnership with various levels of government, agencies supporting the disabled community, and others in order to provide for a service model that supports the equitable distribution of the related financial requirements.

The review report and recommendations were presented to the Commission at its November 27, 2002 meeting. The Commission approved the Eligibility Review – Specialized Transit Services report including the following recommendations:

- the development of accessible public transit services that can be used to meet the range of needs between accessible conventional bus and the paratransit service;
- continued support of other community resources, agencies and providers in developing a system that co-ordinates those resources to their best effectiveness as part of a range of services, that promotes mobility and choice;
- the development of qualifications for service appropriate to each new service as it is introduced. Within the hierarchy of services, those who qualify for specific services should also have access to the other service options in the hierarchical list;
- the establishment of temporary eligibility for persons whose needs will be met by a future service, prior to its implementation. Upon implementation of that service, a person's eligibility status would be changed to include the new service;
- the modification of the application form to identify the applicant's transportation needs and limitations, without unduly focussing on the applicant's condition;
- the establishment of a reconstituted advisory committee, London Accessible Public Transportation Service Advisory Committee, which will represent a more diverse range of the disabled, and will provide advice into a broader range of London Transit services than did the predecessor advisory committee which dealt exclusively with Paratransit (Note: the London Accessible Public Transportation Service Advisory Committee is an outgrowth from the London Paratransit Service Advisory Committee which operated for approximately 25 years in support of the delivery of the paratransit service);
- the establishment of a committee-based appeals process, according to the details laid out in the report; and
- the establishment of an implementation program that includes consideration for continued expansion of accessible conventional services, establishing new initial service (per above) and working with other departments of the City of London, as part of the development of the City's mandated Accessibility Plan, to ensure that City-wide accessibility supports the development and implementation of alternative service models. This includes the identification of barriers, and ensuring that barriers are linked to service requirements and prioritized to be effectively addressed.

viii) 2002-2003 Facility Improvements

As part of the facility upgraded improvements undertaken in 2002/2003, several issues relating to facility access were addressed including:

- improved sidewalk and door access
- improved door designs
- improved parking design and the number of spots for the disabled
- improved lighting and signage in and around the facility

SECTION V – THE YEAR 2003 ACHIEVEMENTS

i) Specialized Transit Service Changes

Consistent with the November 27, 2002 Eligibility Review report, a variety of service options have been developed and implemented including:

- medical shuttles
- workshop shuttles
- trip planning
- travel training

Some of the service options will assist Londoners with disabilities to more readily use accessible conventional transit. Others, such as expanding community bus, introducing flex routes and shuttles, are being studied for potential development to enhance service options for those who cannot avail themselves of accessible conventional transit, yet who do not require lift equipped van transportation. These service options will mesh with a revised eligibility assessment for applicants for specialized transit service and the new focus on matching the individual's needs to the correct service option.

ii) 2003 Bus Stop Standards and Technical Guidelines

In June 2003, the Commission adopted a Bus Stop Standards and Technical Guidelines report. The report sets out:

- standards relating to bus stops, including stop location, passenger amenities and accessibility features; and
- technical guidelines relating to bus stops, maintenance, passenger amenities, accessibility, and inventory.

The report, before being finalized, was reviewed by the appropriate Civic departments as well as the March of Dimes. Comments and suggestions for changes were incorporated in the final document as considered appropriate.

The new bus stop standards ensure:

- a consistent approach to stop locations and placement
- enhancement of the corporate image of the transit system by ensuring that bus stop locations are clean, modern, safe, attractive, with appropriate passenger amenities and features to accommodate accessible transit, and;

- assistance with providing a safe and secure area for passengers waiting to board or those deboarding from a bus.

iii) Accessible Conventional Service Changes

In the fall of 2003, seven additional routes will be designated as fully accessible bringing the total to 14 fully accessible routes. Designation of accessible routes is based upon analysis of specialized transit patterns, customer input and availability of low floor buses. Customer input is generated from the bi-annual specialized transit survey and recorded contacts with customer service department.

iv) Preparation of Accessibility Plan

In 2003, as required by ODA, the LTC prepared an Accessibility Plan, the process for which is set out in Section VII.

SECTION VI PLAN APPROVAL AND COMMUNICATION STRATEGY

The Commission approved the Accessibility Plan at its September 2003 meeting. The required communication of the plan will include the following:

- release of the report at the Commission meeting in September 2003
- presentation of the approved report to Members of City Council via the Environment and Transportation Committee (October 2003)
- release of the approved report to support agencies and London's Accessibility Advisory Committee
- release of the approved report to the Accessibility Directorate of Ontario, Ministry of Citizenship
- release of the approved report to public libraries
- inclusion of the approved report in London Transit's website (www.londontransit.ca)
- notification of the availability of the approved report in "Transit Talk" and LCTB newsletter

SECTION VII – METHODOLOGY FOR CONDUCTING THE REVIEW

An administrative task team was established to develop the initial Accessibility Plan. The task team was comprised of the Directors of Human Resources, Finance and Administration and Planning Services. The major components of the process were as follows:

Major Components	Lead	Support
Develop overall approach, i.e. to look at services, communications/ information, facilities and employment	General Manager	
Development of Work Plan	Director of Human Resources	Director of Planning Services Director of Finance and Administration
Public Consultation Process (all aspects)	Director of Human Resources	Director of Finance and Administration Director of Planning Services
Review of Corporate Policy	Director of Finance and Administration	Administrative Assistant to the General Manager
Transportation Planning issues/ Stop Accessibility	Director of Planning Services	Senior Transit Planner
Review of Facilities Access	Director of Plant and Equipment	City of London Facilities Staff
Review of Standard Operating Procedures	Director of Plant and Equipment Director of Transportation Services	
Employment Issues and Employee Input	Director of Human Resources	Supervisor of LCTB, Manager of Human Resources, Administrative Clerk- Benefits and Commission Legal Counsel
Review of Specialized Transit Issues	Director of Finance and Administration	Supervisor of LCTB
Draft Plan Preparation	Director of Human Resources	Director of Finance and Administration Director of Planning Services General Manager
Draft Plan Review	Director of Human Resources	Director of Finance and Administration Director of Planning Services Commission Accessibility Advisory Committee Support Agencies
Finalize Plan	Director of Human Resources	Director of Finance and Administration Director of Planning Services Commission

The development of the ODA Accessibility Plan included:

- 1) consultation interviews with key agencies, including Canadian National Institute for the Blind, Hutton House, Community Living London, Dialysis Unit at London Health Sciences Centre, Multiple Sclerosis Society, March of Dimes, Regional Mental Health Care and Dale Brain Injury. Barriers were identified and options to work collaboratively to address issues and concerns were reviewed. Responses to the survey which was sent out in support of eligibility review in 2002 were reviewed to go over any agency specific concerns or comments.
- 2) review of existing data sources which included the results of Specialized Service Customer surveys conducted in 1998, 2000 and 2002 and London Transit Commission customer service contact database.
- 3) consultation and involvement on a working committee of the Ontario Community Transportation Association, resulting in the development of a template document for the transit agency which has been tailored to the needs of London Transit.
- 4) consultations with London's Accessibility Advisory Committee.
- 5) a review of London Transit's employment policies, procedures and practices to identify any barriers to people with disabilities. The review considered:
 - internal postings and processes for promotions
 - external recruitment procedures and practices
 - use of Agencies to assist in recruitment efforts

The components noted above were reviewed in light of the ODA, the *Ontario Human Rights Code* (including best practice information from the OHRC's website, and the input of identified employees with disabilities). As the result of this review, procedures and practices were updated and then reviewed by external legal counsel as an additional step. Actions taken as a result are captured in Section VIII; all identified barriers relating to employment issues were addressed in 2003.

- 6) an audit of London Transit's facilities at 450 Highbury Avenue and at Dundas and Richmond with the assistance of staff from the City of London's facilities area using the Facilities Accessible Design Specification (FADS). As the result, changes were made to the parking/boarding area in the visitor's parking lot. Identified areas of non compliance to FADS with respect to Customer Service counters will be added to the 2004 Work Program.

The draft plan was reviewed by the agencies with whom consultation interviews were conducted. In addition, the draft was forwarded to the Province's Ministry of Citizenship which has responsibility for the ODA legislation and also to the City of London's Accessibility Advisory Committee for their review and comment.

SECTION VIII - IDENTIFIED BARRIERS AND TIME PHASED ACTION PLAN

The following tables consolidate the barriers identified through the Accessibility Plan development process. The identified barriers are grouped under the following major categories:

- services
- employment
- facility
- communication

As indicated on the tables, the business of addressing the barriers is continuous. Meeting the targeted timelines will be dependent upon the availability of both human and financial resources, recognizing both limitations of the resources and the competing (both internal and external) demands for the resources.

TABLE 1 – SERVICE

Issue	Service	Description	Action	Who	2003	2004	2005	2006
Bus Stops- Sidewalks	CT	Access to stop location- sidewalk design/curbs including identification of missing curbs	a) Compile a listing inventory of accessibility issues re sidewalk access given stop locations b) Prioritize improvements and establish program to implement	LTC City		X	X	
Bus Stops- Snow Clearance	CT	Snow removal is either delayed or not complete in certain situations	Review standards and priorities re snow clearance, in concert with City priorities and recommend amendments to same as appropriate	LTC City		X		
Bus Stops- Stop design	CT	Design features of the stop itself create barriers	a) Update inventory of stop definitions b) Continue, in a prioritized manner, to implement approved bus stop standards and technical guidelines	LTC LTC	X	X X	X	X
Bus Stops- shelters	CT	Design features such as striping, access to those on wheelchairs	a) Update inventory of shelter status b) Continue, in a prioritized manner, to implement bus stop standards and technical guidelines	LTC LTC	X	X X	X	X
Bus Stops- distance to stops	CT	Mobility impaired may not be able to reach the stop	Continue to look at improvements which may include flex routes, increased number of stops, rerouting of service	LTC	X	X	X	X
Bus Boarding/alighting	ST	Establishment of boarding/alighting area at new and existing facilities	Continue to provide input to site plan development process. Review customer contacts to identify higher need locations	LTC City				
Service Quantity- Accessible routes	CT	Majority of bus routes are not accessible	Continue to expand, in a prioritized manner, the number of accessible routes, based on low floor bus availability and stop upgrades. Seven routes targeted for fall of 2003	LTC	X	X	X	X
Service Quantity- level of services	ST	Number of non-accommodated trips	Continue to develop and implement the family of services consistent with resource availability and direction of LTC Business Plan. Priorities set in annual work plan	LTC	X	X	X	X

CT – Conventional Transit ST – Specialized Transit

TABLE I – SERVICE (continued)

Issue	Service	Description	Action	Who	2003	2004	2005	2006
Fare Parity	ST	<ul style="list-style-type: none"> • Fare media and pricing is different for Specialized services versus Conventional services • Registration fee is a barrier 	As directed by both the London Transit Commission and Municipal Council (Community & Protective Services) the issue of fare parity and elimination of the registration fee will be considered as part of the 2004 budget program	LTC		X		
Service Quality	ST CT/ST	<ul style="list-style-type: none"> a) 3 day advanced booking window b) late/no show policy c) baggage policy d) attendant policy (attendant fare) e) on-time performance f) length of time on vehicle for trips 	Specialized service policies are subject to review and assessment utilizing a series of key performance measurements. Action to be taken to balance impact on quantity and quality of service with availability of resources	LTC		b) X c) X d) X e) X f) X	a) X	
Eligibility for Specialized	ST	Individuals with “temporary disabilities” not eligible for Specialized	Review expansion of current eligibility criteria to include temporary disability. Fiscal implications to be considered as part of 2005 operating budget program	LTC			X	
Service Integration	ST/CT	Currently no provision for transfer between services	Review various issues and impact, e.g. transfer connections/ service scheduling and develop implementation plan for consideration	LTC		X		
System Navigation	CT	Ability of riders to identify stop locations, orient oneself in time and space	Expand trip planning/travel training programs. Assess issue re on board communication by operators re stop locations. Site specific identification	LTC/ Community Agencies	X	X	X	X
Customer Service	CT/ST	<ul style="list-style-type: none"> a) Driver/ Operator awareness b) Fleet reliability (i.e., accessible buses not available) c) Public timetables and schedules 	Continue both global and disability awareness training, including sensitivity to special needs Ongoing maintenance and fleet replacement program and working with suppliers to improve product quality Analyze and deliver alternatives for low vision riders	LTC	a) X b) X	a) X b) X	a) X b) X c) X	a) X b) X
Behavioural Compatibility	CT/ST	Behavioural issues associated with certain disabilities impacting service operations	Public awareness and acceptance through communication. Continued development of attendant travel program and working with community supporting agencies	LTC/ Community Agencies		X		
Sensitivity and Awareness Training	CT/ST	Training for all service delivery representatives on sensitivity and awareness training	Continue to deliver, as scheduled, sensitivity and awareness training	LTC/Service Providers	X	X	X	X

TABLE II - EMPLOYMENT

Issue	Service	Description	Action	Who	2003	2004	2005	2006
Employment Opportunity Advertising	CT/ST	Lack of indication that those with disabilities are welcome to apply	Revisions in the wording of external advertisements to welcome applications as an Equal Opportunity Employer	LTC	X			
Employment Recruiting Agency	CT/ST	Ensure that the agency carries out functions as if the LTC is performing them in terms of dealing with those applicants with disabilities	Clarification of expectations and revision of internal documentation of the contracted Employment Agency	LTC	X			
Employment-accommodating selected applicants and employees with disabilities (permanent/temporary)	CT/ST	Workplace accommodation of a range of disabilities	Review, update and implement London Transit's modified work program	LTC	X			

TABLE III – FACILITY

Issue	Service	Description	Action	Who	2003	2004	2005	2006
Facilities- Visitor Parking	CT/ST	Identified non-conformance with "FADS" on customer service policy	Assess requirement and determine corrective action. Include in 2004 budget program.	LTC		X		
Facilities- Access to Customer Service Counters	CT/ST	Identified non-conformance with "FADS"	Assess requirement, include in 2004 operating budget program	LTC		X		

TABLE IV - COMMUNICATION

No identified issues/barriers arose concerning corporate communications. In keeping with London Transit's commitment to the Human Rights Policy, identified individual needs are addressed as they arise. The corporate website will be reviewed to ensure that it meets current standards for accessibility. Consideration is being given to adding a page or pages to the website which describe the accessibility undertakings of the Commission and describe the accessible features of our services, facilities, and our approach to accessible communications and employment practices.

SECTION VIII - CONCLUSION AND NEXT STEPS

The London Transit Commission has been very progressive since first adopting a goal of full accessibility to its transit services for all citizens of London.

Progress made to date has not been without its challenges, including:

- the overall downturn in the economy experienced in the early to mid 1990's;
- the downturn in London Transit fortunes experienced during the same period and the pressures of growth, e.g. service capacity and reliability currently being experienced
- local service realignment (in 1998)
- availability of public investment; and
- vehicle quality/reliability issues.

Similar challenges will continue to impact London Transit's ability to meet not only the targets of the Accessibility Plan, but also those expected in terms of the City of London's Transportation Plan and London Transit's Business Plan. The objectives may, by their nature, be competing particularly when dealing with the issue of funding the various initiatives.

However, the London Transit Commission has long been dedicated to being proactive in its efforts to identify, remove and prevent barriers for people with disabilities. This Accessibility Plan is considered a work in progress in terms of barrier identification and establishing action plans that provide for an assessment of the barriers and options to address them. The Plan direction, in terms of timelines, reflects the basic premise on how London Transit Commission operates, that is, to build on success through continuous improvement and balance competing needs with available resources.

Linking the Accessibility Plan's development and implementation to the LTC business planning process provides the mechanism to measure progress against plans and also provides the means for safeguarding against new barriers being created.