
ACCESSIBLE ELECTION PLAN 2022

City of London
2022 Municipal Election

January 15, 2022

VOTES



City of London Accessible Election Plan 2022

Introduction

The City of London is committed to making municipal elections accessible to all citizens of London – including voters, candidates, employees and volunteers who participate in the election administration. The City of London's Accessible Election Plan 2022, supports and enhances the City's policies, multi-year Accessibility Plan and commitment to respond to the needs of persons with disabilities.

Purpose

The focus of the Accessible Election Plan 2022 is to:

- a) ensure that electoral services are accessible to all voters and candidates;
- b) identify and eliminate barriers for persons with disabilities; and
- c) create a positive and inclusive voting experience.

Plan Development and Review

The City of London's Accessible Election Plan 2022 was developed by the Elections Office, in consultation with the Accessibility Advisory Committee and the City's Accessibility and Inclusion Specialist.

The following criteria were considered in the development of this Plan:

Policies and procedures must be consistent with the principles of the [Municipal Elections Act, 1996](#), the [Ontarians with Disabilities Act, 2001](#), and the [Accessibility for Ontarians with Disabilities Act, 2005](#), and respect the dignity and independence of persons with disabilities.

The City Clerk's Office will continue to learn, develop and adjust the Accessible Election Plan 2022 in order to meet the needs of persons with disabilities. This Plan will be reviewed and updated as new opportunities are identified or become available. Following the election, the City Clerk will review the outcomes with the Accessibility Advisory Committee to identify potential areas of improvement and any additional barriers experienced during the election that can be addressed in future plans. The City Clerk will report to Municipal Council within 90 days following the election on the outcomes and performance of the Accessible Election Plan 2022.

Legislative Requirements – *Municipal Elections Act, 1996*, as amended

The City Clerk is responsible for conducting municipal elections and establishing policies and procedures to ensure all voters have the opportunity to fully participate in the 2022 Municipal Election.

The *Municipal Elections Act, 1996*, as amended states the following:

12.1(1)A clerk who is responsible for conducting an election shall have regard to the needs of electors and candidates with disabilities. 2009, c. 33, Sched. 21, s. 8 (8).

12.1(2)The clerk shall prepare a plan regarding the identification, removal and prevention of barriers that affect electors and candidates with disabilities and shall make the plan available to the public before Voting Day in a regular election. 2016, c. 15, s. 11.

12.1(3)Within 90 days after voting day in a regular election, the clerk shall prepare a

report about the identification, removal and prevention of barriers that affect electors and candidates with disabilities and shall make the report available to the public. 2016, c. 15, s. 11.

41(3) The clerk shall make such changes to some or all of the ballots as they consider necessary or desirable to allow electors with visual impairments to vote without the assistance referred to in paragraph 4 of subsection 52 (1). 1996, c. 32, Sched., s. 41 (3); 2001, c. 32, s. 30 (1).

45(2) In establishing the locations of voting places, the clerk shall ensure that each voting place is accessible to electors with disabilities. 2009, c. 33, Sched. 21, s. 8 (23).

Accessible Customer Service

The City Clerk's Office is committed to providing quality goods and services that are accessible to all persons in accordance with the City of London Accessible Customer Service Standards (Appendix "A") and in compliance with the customer service standards of the *Accessibility for Ontarians with Disabilities Act, 2005*. In fulfilling our mission, the City Clerk's Office will provide services that respect the dignity and independence of persons with disabilities.

Key Areas of Focus in the Elections Process

The Elections Office has identified the following five key areas of focus within the election process to prevent and remove accessibility barriers:

1. Elections Communication and Information
2. Voting Places
3. Voting Methods
4. Recruitment and Selection of Election Workers
5. Assistance for Candidates

Elections Communication and Information

Provide an informative and accessible election website

- Provide election information is available in clear, simple language.
- Continuously update election information posted on the City's website to reflect the most recent information, and temporary disruptions.
- Enhance the City's "Where Do I Vote?" web application to provide information about voting options, voting places and accessible transportation options
- Establish and continuously update a dedicated accessibility section on the election's website that provides information on voting methods, accessible voting tools, and accessibility feedback.

Provide election information in alternative formats and through multiple channels

- Present information about election accessibility to stakeholder and community organizations.
- Produce an American Sign Language (ASL) interpreted and closed-captioned "How to Vote" video and accessible pamphlet. Provide easy access QR code to video at the polling station.
- Produce a city-wide mail out that outlines key election information, including accessible options on Advance and Voting Day and accessible transportation information.
- Provide election information in braille at the polls on Advance vote and Voting Day.

Voting Places

Ensure Voting Places are accessible to all voters

- Review and update Voting Place Accessibility Checklist 2022.
- Review all potential voting places with consideration for public transit access; provide information to voters on public transit access.
- Clearly identify two (2) accessible parking spots near the closest entrance to the poll(s) during polling station review.
- In the event of disruptions to service or unforeseen circumstances that affect the accessibility of voting places during the Advance Vote or on Voting Day, notices of disruption will be posted as soon as possible:
 - on the City's website
 - on the City's social media
 - at the site of the disruption
- When applicable, a media advisory will be issued.

Ensure all Voting Place access routes and entrances are clearly identified

- Ensure voters directed to the accessible voting entrance by prominent signage.
- Use large-print signage at voting places for election information.

Provide a contact centre to deal with accessibility issues, concerns or complaints on Advance Vote and Voting Day

- Establish easy access website link to an accessibility feedback form so an elector who encounters an accessibility issue can contact Election or Accessibility staff before Advance Vote and Voting Day.
- Provide a separate accessibility information phone line for Advance Vote and Voting Day.

Provide accessible pandemic-related health and safety precautions

- Utilize high-visibility physical distancing markers, if required.
- Use high-visibility health and safety pictorial info-graphics at each Voting Place, if required.

Voting Methods

Provide accessible voting opportunities and methods on Advance Vote and Voting Day

- Provide voters with the option to vote by mail or vote by proxy.
- Provide voter's with the opportunity to request a transfer of their polling location before advance vote or voting day, if the voting place does not meet their accessibility needs.
- Ensure legibility of ballots through use of accessible font styles and sizes, and colours.
- Provide braille and large print candidate lists and vote instructions at each polling station.
- Provide an accessible ballot-marking device (ABMD) at all advanced polls for independent voting via "sip-and-puff", paddles, or a tactile device.
- Provide magnifiers at all voting places.
- Provide on-site ASL interpretation services for the duration of advance vote at City Hall.

Provide assistance to voters, as requested

- Upon request, provide voters with the opportunity to vote from anywhere at the voting place (including curbside) with assistance from a Deputy Returning Officer.
- Upon request, assist the elector with voting or reading of ballot.
- Enable voters to swear an oath if they are unable to provide the required identification and/or documentation with a signature.

Provide instructions on the use of accessible voting equipment

- Produce videos that outline the voting process and the accessible voting technologies in use for the election. Videos will include accessible elements including ASL interpretation and captioning. Post the videos on the City's website.
- Provide pictorial instructions on voting processes at all voting places.
- Host a promotion event (September 2022) on voting technology, including accessible voting equipment and processes.
- Provide recordings for the ABMD audio files using a human's voice.

Recruitment and Staffing

Provide accessibility training to all Voting Day workers who participate in the election

- Develop an Accessible Election Procedure providing direction on how the City of London will address the needs of persons with disabilities during the election and distribute the manual during training.
- Develop accessibility training and reference materials for all elections staff, including:
 - how to interact and communicate with persons with various types of disabilities;
 - how to interact with persons who use assistive devices or require the assistance of a service animal or support person;
 - how to use voting equipment and assistive devices to deliver election services;
 - what to do if a person is having difficulty accessing election information or services.

Ensure the recruitment process for staff is accessible

- Provide accommodations and special services for recruitment process, upon request.
- Ensure the worker's manual and/or other relevant materials are available in an accessible format, upon request.
- Provide applicants an opportunity to proactively request an accessibility-related workplace accommodation during the application process.

Assistance to Candidates

Provide candidates with information on how to make their campaign accessible to the public

- Provide candidates with references and links to provincial publications at the time of nomination, including Accessible Campaign Information and Communication.
- Topics covered include accessible communication, accessible all candidate's meetings, and accessible customer service.

Provide candidates with access to information in alternative and accessible formats

- Provide a Candidate Information Session in-person and electronically. Provide a recording of the information session on the City's website.
- Ensure the candidate guide and/or other relevant publications are available in an accessible format, upon request.
- Provide the City of London Voters' List in multiple formats, upon request.
- Provide accommodations and special information services upon request.
- Provide candidates the opportunity to record their name for the ABMD device on a dedicated phone line established by the Elections Office.

Post-Election Report

Following the election the City Clerk will review the outcomes with the Accessibility Advisory Committee to identify potential areas of improvement and any additional barriers experienced during the election that can be addressed in future plans. The City Clerk will report to Municipal Council following the election on the outcomes and performance of the Accessible Election Plan 2022.

The City Clerk's post-election report will be posted on the City's website in a format accessible to persons with disabilities and distributed to disability groups and other stakeholders, upon request.

Feedback

The City Clerk welcomes feedback to identify areas where changes and improvements can be considered and ways in which the City can improve the delivery of an accessible election. The feedback process provides the City Clerk's elections staff with an opportunity to carry out corrective measures to prevent similar recurrences; address training needs, enhance service delivery, and offer accessible methods of providing election services.

Please provide us with your feedback so that we can continuously improve the accessibility of London's municipal elections. Feedback can be submitted to the Elections Office through a variety of methods including:

Telephone	519-661-4535
TTY	519-661-4889
In Person	300 Dufferin Ave, Second Floor
Mail	300 Dufferin Ave, Second Floor, Elections Office, London, ON N6A 4L9
Website	www.london.ca/elections
Email	elections@london.ca

The London Accessibility Feedback Form can be found on the City of London's website. This form will be forwarded to the Elections Office for action. Additionally, staff can, upon request, complete and submit the feedback form on behalf of a requestor. Each completed form is reviewed by the City Clerk's elections staff who will respond to the candidate or voter directly within two business days, providing an anticipated action and timeframe for a full response where appropriate.

Accessibility has been considered in the creation of this document. If you require this information in an alternate format, please contact the Elections Office.

Appendix "A"

City of London

Accessible Customer Service Standards from the Integrated Accessibility Standards Policy

Customer Service Standards

a. The Provision of Goods, Services, and Facilities to Persons with Disabilities

The City will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- the City's goods, services and facilities are provided in a manner that respects the dignity and independence of persons with disabilities;
- the provision of the City's goods, services and facilities to persons with disabilities are integrated with the provision of goods, services and facilities to others, unless an alternative measure is necessary, whether temporary or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the City's goods, services and facilities;
- persons with disabilities are given an opportunity equal to that of persons without disabilities to obtain, use or benefit from the City's goods, services and facilities.

b. Communication with Persons with Disabilities

When communicating with a person with a disability, the City will do so in a manner that takes into account the person's disability.

Upon request, the City will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at a cost that is no more than the regular cost charged to other persons.

c. Notice of Temporary Disruptions in Goods, Services, and Facilities

The City is aware that the operation of its goods, services and facilities is important to the public. However, temporary disruptions in the City's services and facilities may occur due to reasons that may or may not be within the City's control or knowledge.

The City will make reasonable effort to provide notice of the disruption to the public, including information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, that may be available. The City will make reasonable effort to provide prior notice of planned disruption if possible, recognizing that in some circumstances such as in the situation of unplanned temporary disruption, advance notice will not be possible. In such cases, the City will provide notice as soon as possible.

When temporary disruptions occur to the City's services or facilities, the City will provide notice by posting the information in visible places, and/or on the City's webpage (www.london.ca), or by any other method that may be reasonable under the circumstances as soon as reasonably possible.

d. Assistive Devices and other Measures that Assist with Accessibility

A person with a disability may provide their own assistive device for the purpose of obtaining, using and benefiting from the City's goods, services and facilities. Exceptions may occur in situations where the City has determined that the assistive device may pose a risk to the health and safety of a person with a disability or the health and safety of others on the premises.

In these situations and others, the City may offer a person with a disability other reasonable measures to assist him or her in obtaining, using and benefiting from the City's goods, services and facilities, where the City has such other measures available.

It should be noted that it is the responsibility of the person with a disability to ensure that their assistive device is operated in a safe and controlled manner at all times.

e. Service Animals

Persons with a disability may enter premises owned and operated, or operated, by the City accompanied by a service animal, as defined in section 3 of this policy, and keep the animal with them if the public has access to such premises and the animal is not otherwise excluded by law. If a service animal is excluded by law, the City will ensure that alternate means are available to enable the person with a disability to obtain, use or benefit from the City's goods, services and facilities.

If it is not readily identifiable that the animal is a service animal, the City may ask the person with a disability for documentation from a regulated health professional as outlined in section 3 of this policy, confirming that the person requires the animal for reasons relating to their disability.

The City may also, or instead, ask for a valid identification card signed by the Attorney General of Canada or a certificate of training from a recognized guide dog or service animal training school.

It should be noted that it is the responsibility of the person with a disability to ensure that their service animal is kept in control at all times.

f. Support Persons

A person with a disability may enter premises owned and operated, or operated, by the City with a support person and have access to the support person while on the premises.

A support person, when assisting a person with a disability to obtain, use or benefit from the City's goods, services and facilities, will be permitted to attend at no charge where an admission fee is applicable.

The City may require a person with a disability to be accompanied by a support person while on City premises, but only if, after consulting with the person with a disability and considering the available evidence, the City determines that;

- A support person is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises; and
- There is no other reasonable way to protect the health or safety of the person with disability and the health or safety of others on the premises.

g. Feedback

The City of London is committed to providing high quality goods, services and facilities to all members of the public it serves. Feedback from the public regarding the provisions of goods, services, or facilities is welcomed as it may identify areas that require change and encourage continuous service improvements.

Feedback from a member of the public about the delivery of goods, services and facilities to persons with disabilities may be given by telephone, in person, in writing,

in electronic format or through other methods. The feedback process shall be made accessible to persons with disabilities by providing, or arranging for the provision of accessible formats and communication supports, upon request.

Information about the feedback process will be readily available to the public and notice of the process will be posted on the City's website (www.london.ca) and/or in other appropriate locations.

h. Training

The City will ensure that all persons to whom this policy applies receive training as required the Customer Service Standards under Ontario Regulation 191/11 Integrated Accessibility Standards.

The amount and format of training given will be tailored to suit each person's interactions with the public and their involvement in the development of policies, procedures and practices pertaining to the provision of goods, services and facilities.

The content of the training will include:

- a review of the purposes of the Accessibility for Ontarians with Disabilities Act (AODA);
- the requirements of Ontario Regulation 191/11 Integrated Accessibility Standards which includes Customer Service Standards;
- instruction on the City's policies, procedures and practices pertaining to the provision of goods, services and facilities to persons with disabilities;
- how to interact and communicate with persons with various types of disabilities;
- what to do if a person with a particular type of disability is having difficulty accessing the City's goods, services or facilities;
- how to interact with persons with disabilities who use assistive devices or who require the assistance of a support person or service animal; and
- information about the equipment or devices available on the City's premises that may help with the provision of goods, services or facilities to persons with disabilities.

i. Timeline for Training

Training will be provided as soon as practicable upon an individual being assigned the applicable duties as well as on an ongoing basis as changes occur to the City's policies, procedures and practices governing the provision of goods, services and facilities to persons with disabilities.

ii. Records of Training

The City will keep records of the training, including the date on which training is provided and the number of individuals to whom it is provided. The names of individuals trained will be recorded for training administration purposes, subject to the *Municipal Freedom of Information and Protection of Privacy Act* ("MFIPPA").

i. Availability and Formal of Documents Required by the Customer Service Standard under Ontario Regulation 191/11 Integrated Accessibility Standards

All documents required by the Customer Service Standard under Ontario Regulation 191/11 Integrated Accessibility Standards, including the City's Accessible Customer Service policies, procedures and practices, notices of temporary disruptions, training records, and written feedback process are available upon request, subject to MFIPPA.

When providing a document to a person with a disability, the City will provide the document, or the information contained in the document, in an accessible format or with a communication support, upon request. The City shall consult with the person making the request for a document in determining the suitability of an accessible format or communication support and shall also ensure that the information is provided in a timely manner that takes into account the person's accessibility needs due to their disability and at no additional cost.

j. Notice of the Availability of Documents

Notice of the availability of all documents required by the Customer Service Standards will be posted on the City's website, and available upon request through the City Clerk's Office and City's public library branches. Accessible alternative formats are available of the documents are available, upon request by contacting accessibility@london.ca or by submitting a [Customer Accommodation Request Form](#).