



## **About Buffalo & Fort Erie Public Bridge Authority**

We (the “**Authority**”) are an international compact entity created pursuant to a compact between the State of New York and the Government of Canada. Our principal asset is the Peace Bridge, which is a major international crossing that spans the Niagara River between Fort Erie, Ontario and Buffalo, New York. In addition to being a principal artery in the Niagara Frontier for travel and commerce between the United States and Canada, the Peace Bridge is a vital link to long distance, interstate travel and international trade.

## **Disclaimer**

The information contained within this accessibility plan (the “**Plan**”) does not constitute legal advice. The Authority and all content contributors bear no responsibility for any circumstances arising out of or related to the adoption, or decision not to adopt, any of the recommendations contained in this document.

## **More Information**

Please visit the Authority’s website at <https://www.peacebridge.com/> for further details on the Authority

## **Overview**

The *Accessible Canada Act*, S.C. 2019 (the “**ACA**”) is a federal law that aims to identify, remove, and prevent the recurrence of barriers for individuals with disabilities or accessibility-related needs. The federal government adopted the *ACA* in 2019. The primary goal of the *ACA* is to create a barrier-free Canada by 2040.

The *ACA* applies to the federal government and to all federally-regulated organizations. Because the Authority is federally-regulated, it must comply with the requirements set out in the *ACA*. These requirements include consulting people with disabilities to create accessibility plans and progress reports. This process is critical so as to ensure that those who engage, work with, or receive services from a federally-regulated organization can do so without barriers.

In this Plan, the Authority aims to address accessibility within the following areas:

- Employment;
- Built environment;
- Information and communication technology (“**ICT**”);
- Communication, other than information and communication technology;

- Procuring goods, services, and facilities;
- Designing and delivering programs and services; and
- Transportation

## **General**

### **Executive Summary**

At the Authority we are committed to fostering accessibility. Our efforts to achieve accessibility are connected to and reinforced by:

- The Authority's priorities, including ongoing work to support equity, diversity, and inclusion.
- Federal legislation such as the *Canadian Human Rights Act*, the *Canada Labour Code*, and the *Employment Equity Act*.
- The spirit of comity embodied in the compact between the State of New York and the Government of Canada authorizing the creation of the Authority.

We recognize that accessibility is a fundamental and ongoing element of being an inclusive organization. As such and in accordance with the *ACA*, the Authority is committed to improving its accessibility and encouraging inclusivity.

As per the *ACA*, this Plan relies on the opinions, views, and needs of people facing barriers to accessibility within our organization. Whenever possible, we want to afford those who work for and use the services of the Authority an opportunity to guide how we aim to remove barriers and encourage inclusivity. In this initial Plan, the Authority solicited feedback from its employees and the public through an anonymous accessibility survey

The survey was distributed to employees via a link provided in an email. Printed copies were also made available. To solicit input from the public, the survey was posted to the Authority's website and was also posted to the Authority's Facebook and Instagram pages.

Going forward, we will continue to welcome feedback on how the Authority can continue to foster accessibility and the removal of barriers to accessibility.

### **Input and Feedback**

The Authority is eager to receive feedback on this Plan. We welcome feedback from our employees, as well as the general public, external organizations, and other stakeholders within our organization.

If you have any feedback or questions, please use one of the contact methods below. The Authority is committed to responding to questions and feedback in a timely manner. If you require support while providing your feedback, please let us know and we will do our best to accommodate your needs.

**Contact:** Karen L. Costa

**Mailing Address:** 100 Queen Street Fort Erie, ON L2A 3S6

**Email:** [klc@peacebridge.com](mailto:klc@peacebridge.com)

**Telephone:** 905-871-1608

**Website:** <https://www.peacebridge.com/>

### **What we do with your feedback**

We will document and review all feedback, questions and suggestions formally submitted from staff and the public about our plan and/or progress report. The feedback received will be shared with the Authority personnel responsible for implementing our strategy across the key areas outlined in the *Accessible Canada Act*. All feedback will be considered for integration into Authority priorities, commitments and progress reports.

### **Request and Alternate Format**

You may request a copy of the Accessibility Plan or the description of the feedback process in an alternate format. Contact Human Resources using one of the methods listed in the previous section to request any of the following alternate formats:

- print
- large print (larger and clearer font)
- braille (a system of raised dots that people who are blind or who have low vision can read with their fingers)
- audio (a recording of someone reading the text out loud)
- electronic formats that are compatible with adaptive technology

### **Statement of Commitment**

The Authority is committed to creating a barrier-free, diverse and inclusive work environment for all employees and the public. The authority is working to strengthen its culture of diversity, equity and inclusion and to provide accessible services and employment. As required by the *ACA*, we will publish a progress report each year regarding the implementation of the Plan. As also required by the *ACA*, we will review the Plan at least every three years.

This plan was developed and will be implemented in accordance with the principle “Nothing Without Us,” which recognizes that persons with disabilities are valuable members of our communities and engaged, contributing citizens in all areas of life. Consultation with persons with disabilities is a key part of this process and will continue to inform the contents and implementation of our plan moving forward.

This plan will serve as our accessibility roadmap until 2026 and is in no way exhaustive. It is a starting point to address the challenges known to the Authority at the time of the plan’s inception. We will continue to work toward addressing the unique barriers faced by persons with disabilities as we become aware of the existing and new barriers to accessibility. Nevertheless, this plan seeks to advance awareness and drive positive action toward making the Authority a more accessible and equitable workplace for persons of all abilities.

## Areas Described under Section 5 of the ACA

### Employment

The Authority is committed to identifying and removing barriers to accessibility in employment and preventing the creation of new barriers. This commitment extends to both our existing employees and candidates for employment with the Authority.

#### Barrier No. 1

Persons with accessibility or disability-related needs apply for employment with the Authority at a lower rate than in the labour market general. The external “Employment” web pages are not user-friendly and present barriers to prospective candidates living with disabilities; for example, no text-to-speech assistance is available.

#### Actions

- Enhance the “Employment Application” section of the Authority’s website in order to increase the visibility of Authority jobs to Canadians with disabilities.
- Conduct a self-identification campaign to educate staff on the importance of self-identification and encouraging staff participation. Encourage applicants to self-identify.
- Educate hiring managers on accessibility and how they can ensure a barrier-free hiring, selection, and accommodation process.
- Revise current recruitment and selection practices against leading accessibility practices.

#### Barrier No. 2

Current employees and candidates for employment with the Authority reported that they were not aware of the availability and range of accommodation options.

#### Actions

- Highlight the fact that accommodations are available to candidates while they are applying for positions with the Authority and reiterate this commitment during onboarding.
- Increase employee awareness on where or how to seek accommodations at work (e.g. utilize the Authority’s internal Newsletter to publish articles on staffing accommodations, how to request an accommodation and the Accessibility Plan)
- Increase hiring managers’ awareness of the person(s) responsible for accommodating candidates for employment with the Authority.
- Roll out new training programs for employees and Managers that focus on accessibility, disability and inclusion.

## **Built Environment**

The built environment in which the Authority operates presents unique challenges with respect to identifying and removing barriers to accessibility, as well as preventing the creation of new barriers.

### **Barrier No. 3**

As an international border crossing, the Authority must offer facilities that are generally accessible to all persons irrespective of accessibility or disability-related needs.

#### **Actions**

- Review facilities within the Authority's control and identify physical barriers to accessibility (e.g., uneven pavement, raised curbs, lack of accessibility ramps).
- Increase accessible way-finding for persons with vision impairment (e.g., use of tactile strips, installation of braille text).
- Increase accessibility for persons with hearing impairment to receive assistance at the toll booths (e.g., use of visual communication, installation of keypad for communication).
- Prioritize and update the accessibility features of employee offices and workspaces including workspaces in the toll booth area.

## **Information and Communication Technologies ("ICT")**

The Authority wants to address barriers to accessibility with respect to the technological tools and processes that it uses to send, store, create, and exchange information.

### **Barrier No. 4**

The Authority's IT personnel are not as well versed in accessibility technology as they could be. In order to foster the inclusion of our employees, the Authority must address this knowledge gap.

#### **Actions**

- Implement accessibility training for Authority IT personnel (specific to IT related areas).
- Ensure that knowledge gaps within the IT team on the fundamental principles of digital accessibility are addressed with IT employees acquiring knowledge and skills on how to make technology accessible.
- Make available or increase training focused on accessibility technologies and tools used in the workplace.
- Develop a framework or policy to assist IT personnel when assisting a person with disabilities or accessibility-related needs.

### Barrier No. 5

Individuals must currently request that accessibility features be turned on in order to use them.

#### Actions

- Ensure that the Authority's website meets web accessibility standards and requirements. (WCAG 2.1 AA)
- Raise awareness of accessibility features.
- Regularly review and update Internal digital systems as new accessibility technologies emerge.
- Integrate ICT accessibility requirements into the software development process.
- Develop an internal process to receive and deal with feedback from stakeholders on ICT accessibility.

### Barrier No. 6

The Authority implemented certain technologies to assist travellers while they are transiting across the Peace Bridge.

#### Actions

- Review technologies currently used to facilitate border crossing to ensure that they offer accessibility functions for those who use them. (e.g. visual and hearing impairment)

### **Communication Other than ICT**

The Authority understands that non-ICT communications can impose barriers and restrictions on our employees and other stakeholders.

### Barrier No. 7

The Authority does not use a consistent process to ensure that alternative methods of communication are provided to employees and stakeholders in a timely manner.

#### Actions

- Identify all the alternative methods of communication and create templates, frameworks, and guides with respect to the implementation and availability of these alternative methods of communication. (e.g. visual /audio boards in employee areas to disseminate information)
- Create and store commonly issued communications in alternative formats for ease of distribution upon request.
- When asked, the Authority is committed to providing alternative formats as soon as possible and within a reasonable timeframe as defined within the ACA and its regulations:

- Large print
  - Hard copies
  - Braille
  - Electronic formatting
  - Read-aloud options.
- Reduce the use of PDFs on the Authority's website and use accessible content (HTML) and/or provide alternate format for PDFs currently posted on the website.

### **Procuring Goods, Services, and Facilities**

The ACA requires the Authority to consider the accessibility requirements for procurement and includes accessibility as part of the provision of goods, services, and facilities where appropriate.

#### **Barrier No. 8**

The Authority does not explicitly assess accessibility considerations during the procurement process.

#### **Actions**

- Review and revise the Authority's procurement policies in order to reinforce that accessibility be considered when procuring goods and services.
- Review and revise the Authority's RFP process to ensure that solicitations are easily accessible and available in alternate formats.
- Embed accessibility considerations into procurement templates to inform vendors of the requirement to abide by the requirements of the ACA.

### **Design and Delivery of Programs and Services**

The Authority should strive to deliver its internal and external programs and services in a manner that fosters accessibility and inclusivity. Beginning with the planning stage, the Authority must incorporate accessibility considerations.

#### **Barrier No. 9**

The Authority does not currently have a standard or consistent approach to ensuring that all of our programs and services take accessibility into account.

#### **Actions**

- Create curated checklists for programs and services and systematically conduct checks to ensure that they are accessible and barrier-free.

- Consult with employees with disabilities and external organizations who support accessibility in creating and reviewing the accessibility of programs and services used or offered by the Authority.
- Develop guidelines and frameworks on how to promote and apply accessible alternatives to Authority policies and services.

### **Transportation**

Despite being a major international toll crossing, the Authority does not engage in “transportation” within the meaning of the *ACA*. As such, standards for transportation are not within the scope of this Plan.

### **Consultations**

The Authority developed this Plan in consultation with our employees, candidates for employment, members of the public, and other stakeholders. Throughout this process, we gathered feedback and input in several ways:

- Voluntary and anonymous disability/accessibility disclosure as a part of employment hiring process;
- Survey widely distributed via the Authority’s social media, website, and sent directly to Authority employees; and
- Historical information based on meetings with employees with disabilities.