



Comox Valley Local Governments Accessibility Framework

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1) Introduction

People living with disabilities need access to local government services, programs, goods and facilities in a way that respects their dignity and that is equitable.

The Comox Valley local government partners are taking steps to create connected, accessible and inclusive communities that promote well-being and belonging. This collaborative framework reflects this commitment. This framework aims to help local governments identify, eliminate and prevent accessibility barriers.

Accessibility is the degree to which a product, service, program or environment is available to all.

A **barrier** is anything that prevents the full and equal participation in society of people living with disabilities. Barriers come in many forms, but some of them might be; physical, architectural, attitudinal, technological.

The aim of accessibility is to consider whether a program, service or environment can be used by everyone however they may encounter it.

Equity is the policy or practice of treating everyone fairly by; acknowledging each unique situation and person, accounting for the differences in each person's starting point, ensuring equal opportunity, allocating the exact resources or support based on the need of the person that is required to reach an equal outcome

The aim of equity is to ensure that every person has equal access to benefits or outcomes based on the specific needs of that person.

Inclusion is the practice or policy of involving and integrating all groups, especially those who have been historically excluded, who suffer discrimination or who live with disabilities. Inclusion is the extent to which a person feels a sense of belonging and value within their community. Inclusion is a universal human right.

The aim of inclusion is to create, foster and sustain conditions that allow every person to be fully themselves, feel accepted and be treated equally.

Belonging is a feeling of being happy and comfortable as part of a group. Belonging is a positive relationship with other members of a group because they welcome you and accommodate you. Belonging is one of the most basic human needs and is crucial for good mental health.

The aim of belonging is to create space for people to be safe, seen, accepted, valued and connected.

Shifting attitudes about equity, inclusion and belonging requires self-reflection, education, awareness, commitment and planning. This framework takes a systematic and coordinated approach to reduce barriers in a way that respects the dignity and independence of people living with disabilities.

The framework involved and applies to all Comox Valley local government partners, but each local government will have different ways of implementing it based on its resources and opportunities. The actions a local government takes to identify, eliminate and prevent barriers will evolve as each community's understanding of accessibility grows.

This framework exists thanks to the support, insights and expertise of accessibility experts. Contributions of this knowledge, and perspectives of people with lived experience of disability, are essential, and these voices will be included in community planning and decision making. Local government elected officials and staff are aware of their roles in influencing accessibility and support positive community attitudes.

2) Guiding direction

The purpose of the Comox Valley Accessibility Framework is to create systemic processes to invite the community to give feedback to Comox Valley local governments about ways to promote social and political equity in existing and proposed policies, bylaws and infrastructure. Further, the framework will apply an equity lens to ensure local government actions and investments are inclusive and accommodating to all citizens.

This framework acknowledges that many local government programs, services and infrastructure have been introduced without full consideration of how these measures may affect people with different abilities. This framework aims to help government identify opportunities to treat everyone fairly by acknowledging their unique situation and addressing systemic barriers to ensure that everyone has access to benefits and outcomes determined through an equity lens.

There is no one-size-fits-all approach to accessibility, so local governments will consider the following principles when addressing systemic barriers in the Comox Valley:

- **Inclusion:** All people must be able to take part in the community with individual autonomy and choice.
- **Adaptability:** Services will need to change as accessibility services, technology, and attitudes change.
- **Diversity:** All people are respected for their differences and lived experiences, including disabilities/abilities, age, race, ethnicity, gender, sexual orientation, socio-economic status, religious beliefs, and immigration status.

- Collaboration and engagement: Accessibility is a group responsibility. Local governments commit to engaging community members and work with all stakeholders to end barriers and build an accessible society.
- Intersectionality: Some people are discriminated against in more than one way. Classism, racism, sexism, homophobia, trans-antagonism, ageism, and ableism are more harmful when combined.
- Respect: All people are treated with respect and dignity, for a community focused on positive mental health.

The Comox Valley local governments and the Accessibility Committee described in section 3, as participants in this framework, will aim to:

- identify barriers to inclusion and accessibility and recommend ways to remove and prevent these barriers;
- identify best practices in other communities and recommend ways to promote social and political equity based on the findings;
- participate in reviewing Comox Valley local government draft plans, policies and procedures to prevent future barriers;
- help develop a strategy for engaging with the community on issues relating to accessibility and inclusiveness;
- review documents such as Comox Valley's Regional Growth Strategy, Official Community Plans, zoning bylaws and other policies to identify opportunities to support the related policies;
- discuss other issues referred to the Accessibility Committee by the councils or chief administrative officers of the valley;
- work with elected officials to increase public awareness on issues related to accessibility and inclusion for all citizens; and
- implement the framework's commitments through accessibility assessments and plans according to the local government's priorities, processes, policies and consultations with the community.

3) About the committees

The Comox Valley has two committees focused on accessibility and inclusion:

- The Village of Cumberland's Accessibility and Inclusion Committee is a select committee of Cumberland Council. It is chosen by Council and reports to the Council.

- The Comox Valley Accessibility Committee (the “Accessibility Committee”) is a community-based committee that has served as a resource to local governments and the broader community for 25 years.

Both committees promote equity, social inclusion and accessibility through many activities. At least one member of the Accessibility Committee also sits on Cumberland’s Accessibility and Inclusion Committee. The contributions and longstanding work of these individuals, striving for a more accessible community, is gratefully acknowledged.

To meet the requirements of the *Accessible British Columbia Act* and through collaboration with the Comox Valley Social Planning Society, the local governments and the Comox Valley Accessibility Committee have established a formal relationship and structure. Under this arrangement, the Accessibility Committee will advise and help the local government develop and update action plans and assessments based on this framework.

According to the terms of reference for the Accessibility Committee, selecting accessibility committee members must, to the extent possible, meet the following objectives:

- at least half the members are (a) people with disabilities, (b) individuals who support people with disabilities or (c) individuals who are from organizations that support people with disabilities;
- members reflect a diversity of people with disabilities;
- at least one member is an Indigenous person; and
- members reflect the diversity of people in British Columbia.

The local governments and the Accessibility Committee both wish to achieve meaningful progress and action through this ongoing collaboration.

4) Consultation with the Comox Valley Accessibility Committee

Removing barriers to accessibility and ensuring full and equal participation requires dialogue with the community and particularly with people with disabilities. The Comox Valley Accessibility Committee is made up of residents with considerable expertise, experience and commitment to community-wide accessibility.

Because this framework establishes a shared vision and commitments to remove barriers, it was developed collaboratively between local government staff, the Comox Valley Social Planning Society and representatives of the Accessibility Committee. Key insights and themes that came from this collaboration include the following:

- All participants agree to the framework and commit to work towards action plans to reduce barriers and increase accessibility of all types.
- All participants will ensure transparency as the framework is being implemented.

- The Accessibility Committee members will cover the range of disability from invisible to visible, neurodivergent to neurotypical, and so on.
- The Accessibility Committee will strive to be disability led. It prefers people with disabilities over service providers and aspires to be over 50% of people with disabilities on the Committee.
- Community engagement processes will aim to seek feedback from people with a range of disabilities.
- Participants will all aspire to create plain language documents and will strive to consider all types of disabilities (for example, hard of hearing, blindness, neurodivergence) with appropriate adaptations so they can participate in public processes.
- Roles and responsibilities of all participant groups will be clearly defined.
- All participant groups will communicate clearly with one another.
- A regular check-in will be established (for example, local government staff attend Accessibility Committee meetings quarterly).
- Participants will respond to one another in a timely manner.

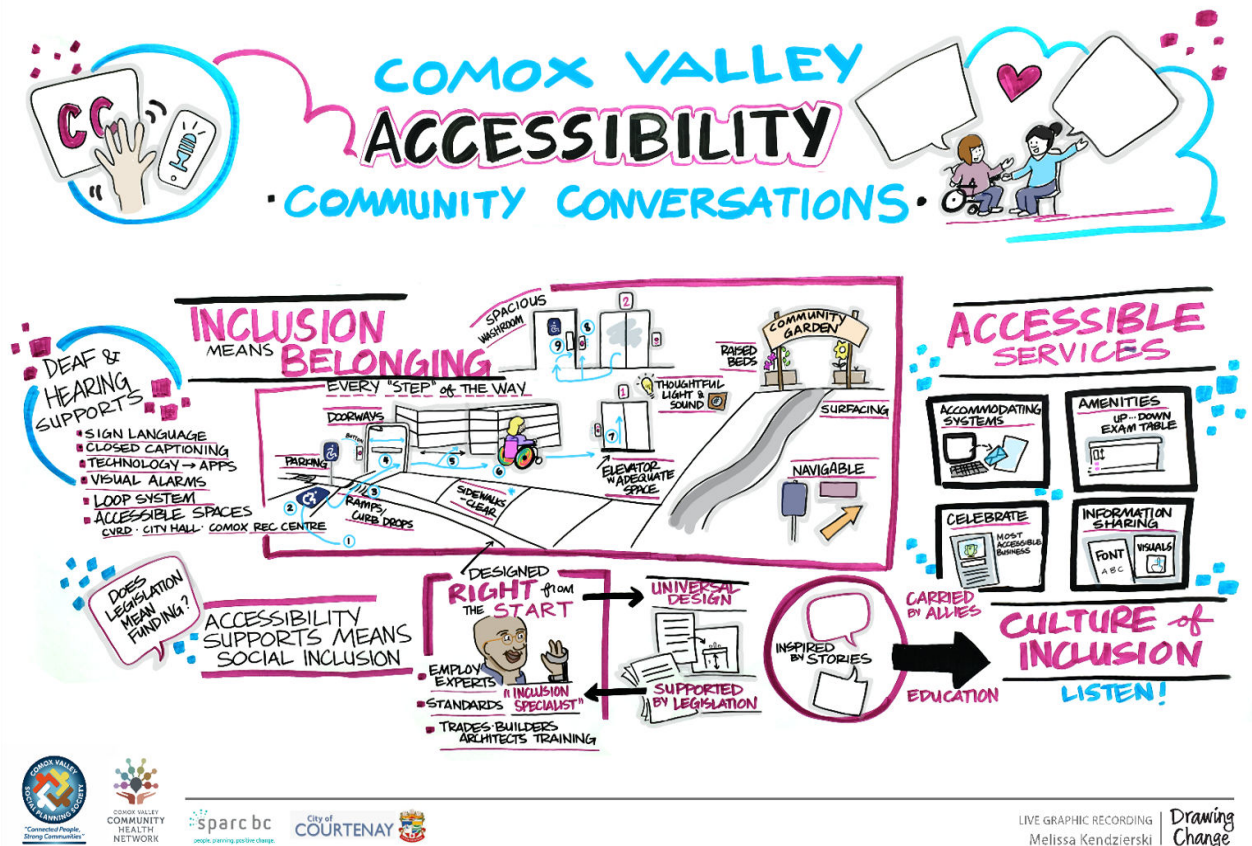
Each local government will implement the framework's commitments through accessibility assessments and plans with consultations considered according to its own priorities, processes and policies. The Accessibility Committee will help the local governments identify barriers to people who work in or interact with the local governments, and advise the local governments on how to remove and prevent these barriers.

5) Public feedback mechanism

Local governments have the power and obligation to incorporate the voices of their communities in their decision making. Giving people with a variety of disabilities and other members of the public meaningful opportunities to give feedback about accessibility and inclusion will help ensure that the work of the local governments reflects community-wide needs and priorities. All people who use local government services play a vital role in helping to identify, reduce, minimize and prevent barriers.

The *Accessible British Columbia Act* and its regulation requires organizations in the province, including local governments, to establish processes for receiving public feedback on accessibility plans and general ideas and concerns related to accessibility. These feedback mechanisms complement the work of the committees and local governments to make the Comox Valley the accessible and inclusive place we strive to be.

One recent example that occurred in the Comox Valley was a series of 5 community conversations hosted by the Comox Valley Accessibility Committee that asked the question “What does inclusion mean to you?” Five graphic recordings were produced, and one is included below.



Developing public feedback processes will be incremental: the processes to gather community feedback will happen in stages based on available resources and knowledge gained over time. Local governments will take further steps to gather feedback on a community-wide basis or at an individual level, or they may establish feedback processes that happen at regular intervals (for example, every year or every 2 years).

The local governments and Accessibility Committee recognize that feedback processes must be accessible through many formats, which may include web submissions, email, phone, mail, in-person conversations, direct engagement with the Accessibility Committee and other approaches. Further adaptive approaches will be needed to gather information from some people with disabilities, such as people who are deaf or hard of hearing, blind, non-verbal, or neurodivergent. Some examples of adaptations are American Sign Language (ASL) interpreters, braille or large-font documents, dyslexic-friendly print, and plain language. The local governments will review and consider all feedback on accessibility assessments and action

plans in consultation with the Accessibility Committee. Each local government will include a process for receiving comments from the public about barriers in their action plans.

6) Identifying barriers

According to the 2021 Survey on Accessibility in Federal Sector Organizations, 75% of British Columbians with disabilities, difficulties or long-term conditions encountered at least one barrier related to accessibility (Statistics Canada, 2021). Although data from local governments is not available, Comox Valley residents with disabilities, difficulties or long-term conditions likely experience similar barriers in accessing local government services and information.

Disability Alliance BC identifies that barriers prevent a person from participating fully in their community. Disability type and severity can also impact a person's experience of barriers (Government of Canada, 2022). BC's Accessibility Plan identifies the following barriers (Disability Alliance BC, 2020):

- **Attitudinal** – when people think and act based on false ideas, such as:
 - making decisions about people with disabilities without including them
 - not believing that a person with a disability can contribute to the workforce
- **Physical** – when obstacles make access difficult, such as:
 - a washroom with an accessible stall but no automatic door opener
 - a meeting or public event in a space with no wheelchair access
- **Information or communication** – when communication methods do not reach people with disabilities, such as:
 - using small print or not providing large-print versions of materials
 - videos, events, or meetings that do not have captions
- **Systemic** – when an organization's policies or procedures aren't inclusive, such as:
 - not providing an American Sign Language interpreter or captioning
 - requiring a driver's license for a position when another form of transportation could be used
- **Technology** – when technology can't be accessed by people with disabilities, such as:
 - websites, documents, or databases that are not accessible for screen readers
 - website graphs and charts that do not have text to explain them
- **Sensory** – when lights, sounds or smells prevent participation in the environment, such as:
 - co-workers wearing perfume in the workplace
 - fluorescent lighting in public event spaces

7) Assessments and action plans

Action plans will clearly describe the local government’s commitment to improving accessibility and reducing barriers. Action plans will identify both short-term and long-term actions that may coincide with other planned work, like major infrastructure works listed in other planning and budget documents. The local government can prioritize actions based on several factors, including greatest impact to the most people, or financial and other resources. The Accessibility Committee will support the work to prioritize actions.

Each local government represents a unique community, and each provides similar but distinctive services to its residents, based on each community’s needs. The local governments may each take a different approach to assessments and action plans under the guiding direction of this framework. Each local government will determine the resources it allocates towards the goals in its action plan, so each local government’s assessments and action plans will be unique.

Factors that the local governments may consider include the following:

- existing planning documents, policies and practices,
- the age of infrastructure and facilities,
- existing capital plans for upgrades and replacement projects,
- interim measures to help improve accessibility, and
- actions that will likely make the biggest impact.

Actions will be part of a long-term commitment to continuous improvement. As new technology, new processes, and understanding of accessibility evolve, further actions to improve accessibility will be planned.

Actions may not satisfy everyone. Feedback on actions can be used to inform future action planning. Taking steps towards greater accessibility and working towards viewing the community with an accessibility lens are paramount.

8) Three-year timeframe

The local governments are expected to begin assessments and create action plans within 18 to 24 months after this framework is finished. Action plans will be reviewed and updated every 3 years, after monitoring and evaluation.

Participants will regularly review this framework and update if needed. Updates may highlight completed actions and confirm renewed commitments from local governments.

9) Monitoring and evaluation

Each local government is responsible for developing qualitative and quantitative metrics to monitor and evaluate (a) accessibility barriers to participation, (b) representation of people with disabilities in government processes and services, and (c) the impact of initiatives on inclusion and access.

Local governments may identify barriers through many different monitoring and evaluation approaches. For example, analyzing program registration information and comparing it with local statistical averages in the community may uncover barriers. Local governments may also identify barriers to participation through surveys, interviews and other feedback mechanisms. The perspectives of both those who did and those who did not participate are important to understand the possible barriers to participation.

Local governments typically ask standard demographic questions when they seek community feedback. These questions ask about age, gender and income, but rarely do local governments ask about ability. Like the federal government, local governments could consider (a) incorporating Statistics Canada disability screening questions in surveys to capture important information on accessibility and (b) collecting qualitative data through focus groups or interviews to complement survey results. Engaging in both qualitative and quantitative monitoring and evaluation will improve representativeness and inclusion. Increased attention to accessibility information will help ensure findings represent the needs and experiences of a diverse range of people with disabilities.

The local governments will share their monitoring and evaluation processes and results with each other and with the Accessibility Committee.

10) Conclusion

This framework captures our overall commitment to accessibility. As planning develops, there will be continual assessments and opportunities to reduce barriers to local government services. Our collective efforts will help improve social health and well-being across the region.