

Council Memo



To	City Council
Service Area	Office of the Chief Administrative Officer
Date	Tuesday, July 22, 2025
Subject	Supplemental Information: Temporary Accessible Ramps

Following discussion at Committee of the Whole on July 8, 2025, Council asked staff to provide a memo related to the following motions put forward on temporary accessible ramps to support access to Guelph businesses:

1. That Council direct staff to consult with the Accessibility Advisory Committee and the "StopGap Foundation" to develop a recommended level of annual funding and implementation plan for a three-year project to increase the number of temporary accessible ramps at the entrances of businesses across the City of Guelph with a goal of improving access for people of all abilities, and
2. That staff examine opportunities for local sponsorship opportunities for the initiative.

Background

The mover of the motions reached out to staff in advance of Committee of the Whole, but staff did not have time or opportunity to conduct research or provide advice on the proposed approach. Staff did advise that limited staff resources were an implementation concern and, given the timing of the upcoming meeting, proposed to address those concerns through the development of an implementation plan that would detail the need for additional resources or workplan changes. Given the nature of this program and strong link to local businesses, expertise from Accessibility Services and Economic Development and Tourism are anticipated to be required.

For context, Accessibility Services staff are currently focused on a number of priority projects including:

- Successfully onboarding new Accessibility Advisory Committee (AAC) members as part of the Advisory Committee of Council governance review and note that committee member recruitment challenges have extended the recruitment window which extended the onboarding of the full committee into the fall.
- Meeting our legislative requirement to comply with Accessibility for Ontarians with Disabilities Act (AODA) and upcoming compliance reporting to the Province and improving website accessibility as a key initiative of AODA compliance.
- Moving corporate AODA training to an on-demand model to respond to internal audit findings from 2023.

- Updating the City's Facility Accessibility Design Manual (FADM).
- Preparing for an anticipated update to the AODA in 2026.

Economic Development and Tourism department staff are currently focused on several priority projects, including:

- The successful onboarding of the new Economic Development and Tourism Advisory committee (EDTAC).
- Tariff outreach with government program representatives and connecting local businesses with relief supports to ensure business continuity through economic shock. With the escalating new tariffs being announced this week, this work is not expected to alleviate in the near future.
- Administering the 2025 Business Visitation Program to gain better insights on the status of Guelph's automotive parts manufacturing sector to ensure Guelph is positioned well to take advantage of Provincial efforts to create a closed supply chain for EV manufacturing.
- Promotion and administration of Affordable Housing CIP Programs 1 and 2 to assist Guelph in creating new affordable units and contributing to the City's housing targets.
- Undertaking economic cluster performance research project to better understand the post-COVID make-up of Guelph's growth industries. The results of this research will provide an indication of gaps and opportunities and inform future strategies to continue to diversify and strengthen the resilience of Guelph's economy.
- Responding to and supporting business expansion and new business attraction projects.

Economic Development and Tourism department staff would be able to support the promotion of any program that helps businesses to improve their accessibility through existing channels but would not be in position to expand without changes to workplan or additional resources.

Considerations

Staff acknowledge the benefits of ramps to increase accessibility for businesses with elevated entrances. There are considerations unique to temporary ramps that need to be further explored in certain circumstances.

Responsibility of the City through AODA:

- The City AODA is a provincial law that sets out a process for developing, implementing and enforcing accessibility standards. It applies to both private and public organizations. O.Reg. 191/11 made under the AODA (the Integrated Accessibility Standards) contains prescriptive accessibility requirements; however, the requirements vary depending on the type of organization and based on number of employees.
- The City is a municipality with over 50 employees and meets the definition of "large designated public sector organization". Many Guelph businesses, particularly those located downtown, are private or non-profit organizations with less than 50 employees and would meet the definition of "small organization".

- The Minister of Citizenship and Multiculturalism is responsible for establishing and overseeing the process to develop and implement all accessibility standards necessary to achieve the purposes of the AODA (s.7). The Deputy Minister has appointed a director for the purpose of the AODA and matters under it (s.30). The director has the authority to, among other things, issue compliance orders and require organizations to provide reports and information (s.21).
- The City is required to comply with the provisions of the AODA and the Integrated Accessibility Standards thereunder, and reports to the Minister on its compliance.
- The City does not have jurisdiction with respect to AODA compliance of other organizations, other than within its scope of authority in planning and building matters.
- Private and non-profit organizations are required under the AODA to have their own accessibility policies for employing and providing services for people with disabilities. The law allows for flexibility in how organizations meet the requirements, but it is the obligation of the organization to create its own policy and achieve its implementation.

Responsibility of the City through the FADM:

- Part IV.1 of the Integrated Accessibility Standards establishes standards and requirements for the design of public spaces. The City has a FADM.
- Private organizations and property owners are subject to different standards and requirements under the AODA and are not required to comply with the FADM.
- The FADM requirements are applicable to all newly constructed, or retrofitted, City owned, operated, or leased facilities. The requirements are encouraged for other newly constructed or retrofitted facilities.
- Staff are also preparing for expected changes to the AODA in 2026 which could further impact the City's responsibilities around accessibility, including design and construction.

Complexities related to temporary ramps:

- Temporary ramps are a good solution in some cases for businesses to be more accessible.
- Temporary ramps may grant access to businesses which are not currently accessible.
- Temporary ramps on or accessing leased premises likely need approval from landlord, followed by education and implementation with the business.
- Downtown landlords need awareness that temporary ramps may require an encroachment agreement with the City of Guelph.
- Temporary ramps may have health and safety considerations and risks.
- Business staff may need education on procedures for temporary ramps including how and when to put ramps in place and remove them.
- Business staff may face physical barriers and risk of workplace injury in moving ramps.

- The rise of a ramp that is more than 600 mm (approximately 24 inches) requires guards and handrails (Ontario Building Code) which are outside of the scope of the motion and may no longer be temporary.

History of community-led initiatives:

- In 2016, the Downtown Guelph Business Association (DGBA) worked with the StopGap Foundation to provide over 40 temporary ramps to the business community in Guelph.
- The City works with the Guelph Barrier Free Committee which supports and encourages businesses to be more accessible. In 2024, Tourism staff, in consultation with the Guelph Barrier Free Committee and partnership with the Regional Tourism Organization 4, ran programming offered by Access Now to support the mapping of accessible businesses known as a Map Mission. AccessNow is a non-profit organization that encourages customers and businesses to list the accessible features of a business so that people can plan their visit to that business appropriately. The need for ramps can be a common comment.

Grant funding for accessible ramps:

- There are also Provincial and Federal grant opportunities which could be leveraged by businesses or community organizations for accessible ramps, one example is the current Provincial program: Enhancing Access to Spaces for Everyone (EASE).
- Another option for organizations seeking to support businesses to become more accessible could be to apply for a City of Guelph Community Grant. Community Grants (formerly Wellbeing Grant) provide funding for not-for-profit organizations that support operating costs, events, special programs or projects, or for small capital items that support the quality of life of Guelph residents.

Staff recommendation

Based on the City's limited scope of authority, staff capacity, existing Council-directed priorities as well as complexities related to temporary ramps and the legal responsibility of private and non-profit organizations, staff recommend this initiative would be better achieved through a community-led approach that leverages grant funding opportunities.

Attachments

None.

Departmental Approval:

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