Ontario Human Rights Code,

Accessibility for Ontarians with Disabilities Act

and the

Integrated Accessibility Standards Regulation

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A. Ontario Human Rights Code

1. Introduction

Welcome to training on the Ontario Human Rights Code. We'll show you how the Code applies to people with disabilities and about your organization's duty to accommodate.

We'll call the Ontario Human Rights Code "the Code", the Accessibility for Ontarians with Disabilities Act "the AODA" and the Integrated Accessibility Standards Regulation "the IASR". They are all laws you must follow.

This module describes your organization's rights and responsibilities under the Code and the AODA standards, as well as how they work together. The IASR under the AODA requires training about the Code and how it helps people with disabilities. This Part A provides that training.

The Code has primacy. This means that Ontario laws (with a few exceptions) have to follow the Code. Its goal is to provide for equal rights so as to create a climate of respect where everyone feels part of the community and can contribute fully. The Code says people with disabilities must be free from discrimination where they work, live, and receive services, and their needs must be accommodated.

The goal of the AODA is for Ontario to be accessible by 2025, by removing and preventing barriers so that people with disabilities can participate more fully in communities.

As part of the AODA, the Government of Ontario is developing and enforcing mandatory province-wide accessibility standards in key areas of daily life. The first regulation under the AODA was entitled "Accessibility Standards for Customer Service." The next three standards - Information and Communications, Employment and Transportation - are contained in one regulation called the Integrated Accessibility Standards Regulation or IASR for short.

The Code and the AODA work together in various ways to promote equality and accessibility.

The Code has primacy. It overrides the AODA and other provincial laws when there is a conflict. In fact, the AODA states that if there's a conflict between it and any other Act or regulation, the law offering the higher level of accessibility comes

first.

The Code and the AODA are both provincial laws, and both use the same definition of disability. They don't apply to the federal government and federally-regulated organizations like banks, airlines, and interprovincial transportation companies - these are covered by the Canadian Human Rights Act.

While the Code and the AODA work together, they have some important differences. Under the Code, when a person with a disability needs accommodation, there is a duty to accommodate. This means organizations may need to provide an individualized response to an accommodation request. The Code applies to all Ontario organizations regardless of type and size. This includes "owner-operator" organizations without employees. It also covers volunteers and unpaid workers.

The AODA sets accessibility standards that organizations must meet. The human rights principles of the Code help to inform and guide how AODA standards are to be met. The AODA standards apply to all organizations (public, private, and not-for-profit) with one or more employees in Ontario. Requirements depend on an organization's type and size.

The AODA standards don't limit or replace the requirements of the Code or any other law. Meeting AODA standards doesn't guarantee that an organization has met Code requirements or that the organization won't receive human rights complaints, but it may lower the risk of complaints.

2. The Code

The Code offers protection of rights, equal opportunity, and freedom from discrimination. It applies to jobs, housing, and services, and states that employers, landlords, and service providers must accommodate people with disabilities to the point of undue hardship.

Employers must accommodate employees when they cannot perform all of the duties of the job because of their disabilities. For example, suppose an employee with low vision has a job requiring her to work on a computer. Accommodating her needs might include supplying appropriate computer technology.

Accommodation means not denying people jobs or services in the first place if they can be accommodated to the point of undue hardship. Changes to an

organization's policies and practices or staff training, so that discrimination doesn't recur, may be required.

The Code is not meant to punish. When discrimination happens, the goal is to fix the situation to provide equal opportunity for the person with a disability. The Code promotes educating and working with organizations to make changes that prevent discrimination and harassment.

Many people think of disabilities as noticeable physical disabilities — such as someone using a wheelchair. But not all disabilities are visible and you can't always tell who has a disability.

In the Code, disabilities can include physical limitations, mental health, cognitive or intellectual development, learning, hearing, or vision. They also can include epilepsy, substance addictions, environmental sensitivities, and workplace injuries.

The Code protects people from discrimination and harassment because of past, present, or perceived disabilities.

Disability itself is not a barrier, but barriers exist that can exclude people with disabilities. These include physical barriers, information and communication barriers, systemic barriers, or attitudinal barriers.

Barriers to accessibility prevent people with disabilities from fully taking part in the social and economic life of our communities.

Physical barriers include things like providing steps, but no ramps or elevators.

Information and communication barriers can make it difficult for people to receive or give information, such as using unclear language or print that's too small.

Systemic barriers can result from stereotypes or established practices, such as inflexible work hours that don't coordinate with para-transit bus schedules.

And attitude can be the biggest barrier. "Ableism" is a tendency to see people with disabilities as less worthy, underestimating their potential, or excluding them from decisions that affect them.

Organizations should try to identify and remove barriers before problems arise, instead of waiting to answer individual accommodation requests or complaints. You can also avoid creating barriers altogether through inclusive planning and

design. For example, when setting up a new web-site, design it for people who have sight and hearing disabilities.

3. Understanding the Duty to Accommodate

Accommodating the individual needs of people with disabilities is a legal duty under the Code. This allows people to benefit equally and take part fully in the workplace, housing, and other services. The most appropriate accommodation is the one that best meets the individual needs of the person with a disability. You are only exempt if it would cause undue hardship — a very high test.

There is no set formula for accommodation. Some accommodations can benefit many people, but what works for one person may not work for others. You must consider individual needs each time a person asks to be accommodated. Many accommodations can be made easily and inexpensively. But if it's not possible to put the best solution in place, or if doing so results in undue hardship, you still have the duty to take the next-best steps. Examples of accommodation include:

- Providing printed material in alternative formats such as electronic files, large print or Braille.
- Providing sign language interpreters or real-time captioning for people who are deaf or hard of hearing
- Offering flexible work hours or break times
- Modifying job duties, retraining, or offering alternative work
- Installing automatic door openers and accessible washrooms.

Accommodation doesn't have to be provided if it causes undue hardship. Undue hardship is the legal limit of the duty to accommodate. It refers to situations where severe negative effects outweigh the benefit of providing accommodation. Three factors are used to determine undue hardship:

- One: Costs. Renovating an older building to make it accessible may be too costly for a small business. If the business must reduce staff or hours to provide the accommodation, then it may be able to claim undue hardship.
- Two: Are there external funding sources, such as grants or tax breaks, to reduce the accommodation costs?
- And Three: Health and safety considerations. For example, there may be undue hardship if the accommodation violates occupational health and safety regulations. Employers must try to keep all workers safe and still accommodate the needs of the worker with a disability. If a significant risk remains for others, it will be undue

hardship. If a significant risk remains only for the worker with a disability, they might have the right to accept the risk. The courts have set a very high standard of proof. You must provide clear evidence if you are claiming undue hardship.

Employers have a duty to accommodate the employee as fully and as promptly as possible in his or her job. Modifying job duties might be appropriate in some cases. If accommodation in the original job isn't possible or would cause undue hardship, consider other available jobs or re-training opportunities that could accommodate the employee in another job. You may be held liable if your organization fails to take steps over time to accommodate employee needs.

Everyone involved must take part in the accommodation process. Sometimes outside experts can help too. If you need an accommodation:

- Tell your employer, union, landlord, or service provider about any needs related to your disability and your job duties, tenancy, or the services being provided.
- Provide supporting information about your disability-related needs, including medical or other expert opinions where required.
- Get involved in seeking accommodation solutions to the best of your ability.

An employer, union, landlord, or service provider must:

- Accept requests for accommodation in good faith.
- Act promptly, even if it means creating a temporary solution before a long-term one can be put in place.
- Ask only for information needed to provide the accommodation. For example, you may need to know that someone with vision loss is unable to read printed material, but not how or why she lost her vision.
- Actively seek appropriate accommodation solutions and ask for expert help if needed.
- Cooperate with other parties where necessary.
- Respect the dignity and privacy of the person asking for accommodation, and make sure the accommodation process doesn't lead to reprisals against that person.
- Cover the costs of accommodations, such as any needed medical or other expert opinions or documents, to the point of undue hardship.

4. Applying Human Rights Principles

Organizations should follow human rights principles and Code obligations when implementing the AODA standards. Keep these points in mind:

- Don't create new barriers: Don't make changes to facilities, services, goods, technology, or procedures that reinforce or create new barriers.
- Design inclusively: Make choices that work for as many people as possible, especially those with disabilities, while meeting individual needs.
- Favour integration over segregation: Usually the best accommodations allow people with disabilities to participate in similar ways with everyone else.
- Equal outcomes sometimes require different treatment: Different or separate accommodations may be necessary to help people do their jobs or access services.
- Involve those who need accommodations in exploring solutions: They often know what works best for them. Make sure the process and solutions meet the individuals' needs and promote privacy, dignity, and respect.
- And, spread out accessibility costs; people with disabilities should not face extra costs for accommodations they need to do their job or receive a service. Accessibility should be factored in as part of the overall cost of doing business.

The Code and AODA accessibility standards are laws that work together to promote equality and accessibility in Ontario. Under the Code, employers must consider disability-related accommodation requests and provide timely accommodation, from recruiting and hiring through to retirement or dismissal.

The Employment Standard of the Integrated Accessibility Standards Regulation builds on these requirements. Organizations must set up processes to address employee accommodation needs at all stages of their employment. Except for small organizations, employers must have a written process to document an employee's accommodation needs in an individual accommodation plan. This important step helps ensure that all the necessary people are involved, the right steps are taken and the best possible solutions are considered and put in place.

The Information and Communications Standard and the Transportation Standard of the IASR also complement the Code's duty-to-accommodate requirement. As you implement the accessibility standards, please keep in mind the Code principles and requirements you've learned in this training.

5. Compliance and Enforcement

Understanding and applying human rights principles may help avoid potential human rights complaints and litigation.

Ontario has three organizations in the human rights system: The Ontario Human

Rights Commission, the Human Rights Tribunal of Ontario, and the Human Rights Legal Support Centre:

- The *Human Rights Commission* provides policies, guidelines and other information on Code grounds, including disability and the duty to accommodate.
- The *Human Rights Tribunal* hears discrimination claims (called applications) on any Code ground. This includes claims from individuals who believe an organization or person has failed to accommodate disability-related needs.
- The *Human Rights Legal Support Centre* helps people through the human rights process, such as completing an application or claim to the Tribunal.

Individuals cannot file accessibility complaints under the AODA. But in cases of non-compliance, the Directorate can enforce standards through mechanisms set under the law. Meanwhile, the Accessibility Directorate works with organizations having trouble meeting the standards in order to bring them into compliance.

B. The Integrated Accessibility Standards Regulation

1. General Requirements of the Regulation

(a) Introduction

When something is developed for the first time, its design typically reflects the technology advancements or limitations of the time.

As time goes on, through a process of re-thinking… trial and error, we find improvements that benefit even more people.

Improvements make a thing we've created not only better, but that also make it more useful for us all.

To create a province where every person who lives or visits can participate makes good sense — for our people, our businesses and our communities.

That's why we're making Ontario accessible to all.

How do we do that? We do that by striving to remove barriers.

Barriers to accessibility are obstacles that make it difficult – sometimes impossible – for people with disabilities to do the things that most of us take for granted.

Barriers aren't just physical things, such as steps onto a bus or a door without a push button opener.

Information that a person can't easily access or understand can be a barrier. For example, when the print is too small on a brochure for someone with vision loss to read it.

Technology, or lack of it, can prevent access. Even everyday information technology like telephones and computers can present barriers.

Organizational barriers occur when policies, practices or procedures don't take accessibility into account.

Attitudinal barriers are about what we think or assume. For example, assuming someone with a speech impairment can't understand you.

Removing barriers doesn't have to be complicate. Mostly it takes a slight shift in perspective.

Approximately 1.85 million people in Ontario have a disability. That's 15.5% of Ontario's population.

As the population ages, it's expected that the number of Ontarians with a disability will increase, as will the need for accessibility.

In 2005 the Government of Ontario passed the Accessibility for Ontarians with Disabilities Act, also known as the AODA.

Its goal is to make Ontario accessible by 2025, by creating and enforcing accessibility standards.

These standards are rules that businesses and organizations in Ontario have to follow to identify, remove and prevent barriers so that people with disabilities will have more opportunities to participate in everyday life.

Standards address key areas of daily living, such as customer service, information and communications, and employment.

Several accessibility standards are contained in one regulation under the AODA. It's called the Integrated Accessibility Standards Regulation, also known as the IASR, or simply "the regulation".

The IASR also includes a section of general requirements that apply to all the standards in the regulation.

This regulation is now law and requirements are being phased in over time to meet the goal of an accessible Ontario by 2025. This gives organizations time to make accessibility a part of their daily business.

It's important to note that the standards do not replace requirements established under the Ontario Human Rights Code to accommodate persons with disabilities to the point of undue hardship. They also do not limit obligations under any other legislation. If two laws conflict with one another, the AODA states that the law that provides the higher level of accessibility is the law that must be followed.

Compliance deadlines for the requirements vary based on the size and type of an organization. So, it's important to know how the regulation defines different types of organizations.

The regulation applies to every person or organization that provides goods, services, or facilities to the public or other third parties and that has at least one employee in Ontario.

Organizations are grouped into five classes:

1. The Government of Ontario, including every ministry, the Office of the Premier, and the Legislative Assembly including constituency offices of the members of the Assembly.

2. Large designated public sector organizations with 50 or more employees, including municipalities, hospitals, school boards, colleges and universities, and public transportation organizations.

3. Small designated public sector organizations are those with fewer than 50 employees, such as the Ontario Office of the Fairness Commissioner and some municipalities.

4. Large organizations are those with 50 or more employees in Ontario. This includes private sector organizations such as businesses and not-for-profit organizations.

5. And small organizations are those with one to 49 employees in Ontario.

The general section of the regulation outlines the requirements for: accessibility policies, accessibility plans, training for employees and others, and self-service kiosks. These general requirements apply to all the standards and are outlined in this Part B.

Accessibility improvements benefit us all.

Accessible buses and exterior paths of travel are not only good for people who use wheelchairs or canes, but help people carrying luggage and parents with strollers.

Closed captioning allows both people with hearing loss and the group of friends at a pub to understand what's happening in the game.

Accessible documents and websites not only make using a screen reader possible, but also work better on personal handheld devices.

Greater accessibility means greater opportunity for Ontario. If we become more inclusive, we really will create a province where every person who lives or visits can participate and contribute to the life of our communities.

Doing so makes good sense — for our people, our businesses, and our communities. For all of us.

(b) The Training Requirement

The regulation may influence how your organization operates; therefore, it's important for people in your organization to be aware of the requirements and the importance of accessibility. This is why training is a requirement.

Organizations must provide training on the requirements of the regulation as it relates to a person's duties – and on the Ontario Human Rights Code as it relates to people with disabilities.

Training must be provided to:

- All existing and new employees and volunteers

- People who participate in developing your organization's policies

- Other people who provide goods, services, or facilities on behalf of your organization

For example, training as it relates to a person's duties means a public relations officer of a municipal transit system may need training on the Transportation Standard, whereas an administrative assistant may not. Similarly, a human resources professional or manager may need training on the Employment Standard, while this may not be necessary for a security guard or accountant.

Organizations are also required to provide training when the organization's accessibility policies change.

All organizations **except small organizations** must keep a record of the training provided, including the dates the training took place and the number of individuals trained.

(c) Accessibility Policies and Plans

Organizations must develop accessibility policies describing what they do, or intend to do, to meet the requirements of the regulation. These policies serve as rules that guide your organization's everyday practices.

All organizations **other than small organizations** must also:

- Document these policies in writing.

- Make your policies publicly available, and in an accessible format on request.

- Include a statement of your organization's commitment to accessibility.

Organizations, **other than small organizations**, must develop an accessibility plan.

An accessibility plan outlines the steps that your organization will take to prevent and remove barriers to accessibility and how the requirements of the regulation will be met.

If you belong to an organization **other than a small organization**, you must:

- Establish, implement, document, and maintain a multi-year accessibility plan.

- Post the accessibility plan on your website, if you have one, and provide the plan in an accessible format on request.

- Review and update the accessibility plan at least once every five years.

Your organization may wish to do an assessment to help better understand its readiness to meet its accessibility requirements. An assessment may help develop an effective plan to prevent and remove barriers to accessibility.

It is important to understand barriers to accessibility when developing an organization's accessibility plan.

What is a barrier to accessibility? Barriers can prevent a person with a disability from fully participating in society. Some examples of barriers are:

- Information and communication: Example: Print that is too small to read

- Attitudinal: Example: Assuming that a person who has a speech impairment cannot understand you

- Technological: Example: A website that does not support screen-reading software

- Policy or practice: Example: A hiring process that does not offer accommodations in interviews

At first glance, there are a few terms in the regulation that might seem interchangeable, but they aren't.

- **Accessibility Policies**: An accessibility policy states what rules or principles an organization will put in place to support achieving its accessibility goals.

  An example of a policy might be: "Our organization will meet the information and communication needs of people with disabilities by providing, upon request, information and communications materials in accessible formats or with communication supports."

- **Accessibility Plans**: An accessibility plan describes the actions an organization will take to prevent and remove barriers and when it will do so. An accessibility

plan creates a road map for an organization to increase accessibility. It's the actions that support an organization's commitment to accessibility and its accessibility policies.

An example of an action item in an accessibility plan could be how the organization intends to meet the accessible formats and communication supports requirement of the regulation.

(d) Self-Service Kiosks

A self-service kiosk is an interactive electronic terminal, such as a point-of-sale device you use at a grocery store checkout or for fare or parking payment. People with disabilities should be able to use a self-service kiosk as independently and securely as possible.

An example of a barrier to accessibility in self-service kiosks:

- Many organizations have self-service kiosks that use touch-screen technology, which is difficult or impossible to use for people with vision loss. This is a technical and structural barrier that can have a significant impact for people trying to make purchases independently and securely using a touch-screen kiosk. When determining what accessibility features can be included in the design or purchase of a kiosk, you may want to consider including an alternate (non-visual) way to use it, such as a tactile keyboard and audio instructions.

Large and small organizations:

- Shall 'have regard' for people with disabilities when designing, procuring, or acquiring self-service kiosks. This means organizations must consider what accessibility features they could build into their kiosks to best meet the needs of their customers and clients.

2. The Information and Communications Standard

(a) Introduction

Consider for a moment what you've done so far today. Perhaps you browsed a newspaper on the Internet or checked your email. Maybe you attended a meeting or had a casual conversation with a colleague in the hall or through instant messaging?

So much of our world today is about information and communications...

...from chatting with a family member...

...to reaching out to colleagues.

But imagine what it would be like if all of those lines of communication suddenly became blocked.

If, when surfing the Internet, some pages just don't work.

When you open up a document that you were told contains information you need, such as a bus schedule, it's unreadable.

Or what if, while in a meeting, suddenly, it's as if the sound is turned off.

If your access to information was turned off, how would you know what's going on in the
world around you? How would you make decisions?

It would be like entering a world where everything appears to be the same. But rather than finding information that will allow you to participate, you find barriers.…

…Always another barrier.
The good news is there are solutions to information and communication barriers, for example technology.

For people without disabilities, technology makes things convenient. For people with disabilities, technology makes things possible. As long as they're set up right.

For example, if you're following web development best practices, your website may only need a few tweaks to be accessible to those with disabilities.

In addition, some accessible solutions can be as simple as reading a document out loud to someone, or providing an electronic version so they can re-size the text to suit their needs.

Making information and communications accessible is not only helpful to people with disabilities, it benefits us all. A properly formatted document or accessible website displays properly in all browsers, including personal hand-held devices.

The Information and Communications Standard, as covered in this Part B.2, outlines how organizations will be required to create, provide, and receive information and communications in ways that are accessible to people with disabilities.

(b) Accessible Formats and Communication Supports

When requested, you must provide information and communications in an accessible manner to people with disabilities.

Alternatives to standard print are often referred to as accessible formats, and ways to help communication between people are referred to as communication supports.

When a request is received, you must consult with the person to determine their accessibility needs.

You have the flexibility to determine the most appropriate accessible format or communication support, depending on the accessibility needs of the person and the capability of your organization to deliver.

Accessible formats and communication supports must be provided in a timely manner and at a cost that is not more than the regular costs charged to other people.

What are some examples of alternate formats and communication supports?

- Reading written information to a person directly

- Large print

- Text transcripts of audio or visual information

- Handwritten notes instead of spoken word

- Information written in plain language

- An electronic document formatted to be accessible for use with a screen reader

(c) Exceptions to the Requirement

This requirement is about providing accessible information and communications about goods, services, or facilities offered to customers, clients, and others.

The requirement does not apply to the following:

- Products and product labels.

  Note: A store that sells DVDs for example, does not have to make its products or product labels accessible, but the store must still take into account a person's disability when communicating with them about their products, such as verbally informing a customer with vision loss about their DVD selection.

- Information that you do not control directly or indirectly through a contract, unless your organization is involved in education or training as defined in the regulation.

- Information or communications that cannot be converted.

There might be instances when you are unable to convert the requested information or communication. For example, if:

- The technology to convert the information is not readily available, or

- The information may be lost in the conversion process and cannot be conveyed in a meaningful way, for example, the visual information in an x-ray or architectural blueprint.

Organizations will need to determine, in consultation with the person requesting the information or communications, if it is possible to provide it in an accessible format or with appropriate communication supports.

When it's not possible to convert requested material, you need to provide the individual making the request with the following:

- An explanation as to why the information or communications are unconvertible, and

- A summary of the information or communications.

By providing these two things, you may be helping someone to obtain an understanding of the information they need.

(d) Feedback Processes

Under the Accessibility Standard for Customer Service, organizations had to establish a customer service feedback process for receiving and responding to feedback about the manner in which they provide goods or services to people with disabilities.

Your organization may have other types of external or internal feedback processes to receive and respond to the public and/or employees. For example, an organization may gather feedback through online surveys or forms, by email, by phone, or in print.

Under the Information and Communications Standard, if your organization has feedback processes in place, you must make them accessible. This may include:

- Arranging for accessible formats and communication supports on request.

- Notifying the public about the availability of accessible formats and communication supports.

(e) Accessible Websites and Web Content

An organization's website is often a primary way it shares information. That's why it's important that your website and web content be accessible.

Your organization must conform with the international Web Content Accessibility Guidelines (WCAG) 2.0, as outlined in the regulation. The WCAG 2.0 guidelines explain how to make web content more accessible to people with disabilities. These guidelines were developed by the World Wide Web Consortium (W3C).

WCAG 2.0 has different levels of compliance that determine how accessible a site is. So, what makes a website more accessible?

Examples of what types of features are required within the compliance Levels A and AA, are provided below:

- Level A:

  The first, most basic level of accessibility compliance is called Level A. An example of a Level A accessibility feature on a web page is alternative text. Alternative text appears when your mouse hovers over an image. It's important to use appropriate text when describing an image so that screen reader technology can describe the image to a person with vision loss.

- Level AA:

  The second, more extensive level of accessibility is called Level AA. An example of a Level AA accessibility feature on a web page is properly named headings and labels, which enable people using screen reader technology to scan through the information on a web page efficiently.

For example, to quickly identify what stories are on the home page of a newspaper, a screen reader can search just the headings for each story. Properly labelled headings allow the screen reader to tell when one article stops and the next begins. If this is not done, every individual article will be read as one story.

Each header should be labelled with the news article's subject. This allows users to easily find the information they want.

For more information about the levels of accessibility outlined in the Web Content Accessibility Guidelines (WCAG), please visit the World Wide Web Consortium's (W3C) website.

The deadlines by which organizations must achieve the first level of web accessibility (WCAG 2.0 Level A) vary depending on size. However, by January 1, 2021 all Internet websites must conform with WCAG 2.0 Level AA, and all web content available on these sites that was developed after January 1, 2012, must also conform. The exceptions are live captioning and pre-recorded audio descriptions. This requirement does not apply to small organizations.

(f) Educational Institutions

There are sections of the standard that apply specifically to educational institutions such as public and private secondary schools.

The following sections of the standard apply specifically to the educational institutions:

- Eductional and training resources and materials

- Training to educators

These requirements are outlined below.

Which educational and training institutions must comply:

- Organizations that are governed by the Education Act

- Public or private organizations that provide courses or programs or both that result in the acquisition by students of a diploma or certificate named by the Minister of Education under paragraph 1 or subsections 8 (1) of the Education Act.

- A private school within the meaning of the Education Act.

Educational and Training Resources and Materials

If you belong to an educational institution and a student notifies you of a need due to a disability, you must:

- Provide learning resources or material in an accessible format that takes into account their accessibility needs.

- Provide student records and program information in an accessible format that takes into account their accessibility needs.

You can provide the student with one of the following:

- An accessible or conversion-ready electronic format, where available or

- A comparable resource in an accessible or conversion-ready format, if the resource cannot be obtained or converted into an accessible format.

Training to Educators

Educators need to know how to make their teaching accessible. This means that educational institutions must:

- Provide educators with accessibility awareness training related to accessible course delivery and instruction

- Keep records of training provided, including the dates it was provided and number of individuals trained.