



Policy: Accessibility Policy

Policy Number: LS09

Effective Date: May 9, 2016

Revised Date: September 28, 2026

Purpose:

The *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* requires public organizations to meet accessibility standards in this legislation. The purpose of this is to guide the review and development of Thames Centre goods, services, customer service, programs and facilities in an inclusive manner that considers AODA and the needs of persons with disabilities.

Scope

This policy will be applicable to all Municipality of Thames Centre Employees, Volunteers and Members of Council.

Statement of Commitment

The Municipality of Thames Centre (the Municipality) is committed to providing a barrier-free environment for all stakeholders, including residents, visitors, employees, job applicants, and suppliers, who enter the premises, work for the Municipality, access information provided by the Municipality or use the Municipality's goods or services.

The Municipality will work to remove the barriers that limit persons with disabilities from employment, accessing of goods or services, the built environment/public spaces and information and communication the implementation of accessibility standards.

Definitions

Assistive Devices: refers to technical aids, communication devices, or medical aids modified or customized for use to increase, maintain or improve the functional ability of a person with a disability including but not limited to wheelchairs, walkers, white canes, note taking devices, portable magnifiers, recording machines, assistive listening devices, personal oxygen tanks and devices for grasping. Assistive devices may accompany the stakeholder or already be on the premises for the purpose of assisting persons with disabilities in carrying out activities or in accessing the services

provided by the Municipality.

Barriers: anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice as defined by the AODA.

Customer: an individual or group of people who have a business relationship with the organization; those who receive and use or are directly affected by the products and services of the organization. Customers include direct recipients of products and services, internal customers who produce services and products for final recipients, and other organizations and entities that interact with an organization to produce products and services.

Customer Service: refers to efficiently satisfying a customer's needs by providing and delivering professional, helpful, high-quality service and assistance before, during and after the customer's requirements are met. A customer can be internal or external to the organization.

Disability: as defined in Section 2 of the *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11* and the *Ontario Human Rights Code, R.S.O. 1990, c. H.19*, as follows:

- a. any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal, or on a wheelchair or other remedial appliance or device,
- b. a condition of mental impairment or a developmental disability,
- c. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d. a mental disorder, or
- e. an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Service Animal: as defined in Section 80.45(4) of the Ontario Regulation 191/11 - Integrated Accessibility Standards Regulation (IASR) under the AODA, an animal is a service animal for a person with a disability if,

- a. the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
- b. the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:

- i. A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
- ii. A member of the College of Chiropractors of Ontario.
- iii. A member of the College of Nurses of Ontario.
- iv. A member of the College of Occupational Therapists of Ontario.
- v. A member of the College of Optometrists of Ontario.
- vi. A member of the College of Physicians and Surgeons of Ontario.
- vii. A member of the College of Physiotherapists of Ontario.
- viii. A member of the College of Psychologists of Ontario.
- ix. A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support Person: a support person accompanies a person with a disability to assist with communication, mobility, personal care or medical needs or with access to goods or services.

Policy Provisions

1. General

This policy establishes a framework for compliance with the Municipality's commitment to accessibility, requirements of the AODA requirements of Ontario Regulation 191/11 - *Integrated Accessibility Standards Regulation* ("IASR") under the AODA, The *Ontario Building Code*, the *Ontario Human Rights Code*, other applicable legislative requirements, and additional Municipal requirements.

The AODA provides for the development, implementation and enforcement of accessibility standards in order to achieve accessibility for persons with disabilities in all aspects of society. The Municipality must meet requirements in key areas including:

- General Requirements (Procurement, Training and Policy)
- Information and Communication
- Customer Service
- Employment
- Transportation
- Built Environment and Public Spaces.

All Municipal policies, procedures, by-laws, standards and guidelines must comply with the AODA, and provide for dignity, independence, integration and equal opportunity for persons with disabilities. In all of the key areas listed above, the AODA requires the Municipality to:

- Identify, prevent and remove barriers persons with disabilities face in accessing the Municipality's goods, services, and facilities
- Accommodate the accessibility needs of persons with disabilities to ensure

they can obtain, use or benefit from Municipal goods, services, and facilities, and that they can do so in a timely manner, at a cost no greater than the cost for persons without disabilities

- Allow persons with disabilities to use their own personal assistive devices to obtain, use or benefit from the services offered by the Municipality
- Communicate with persons with disabilities in a manner that takes into account the person's disability, and
- Develop and train municipal employees on providing accessible goods, services, and facilities.

1.1 Policy Accessibility and Request Process

The Municipality will make this Accessibility Policy and related accessibility documents available in accessible formats and with communication supports upon request. Requests may be made to the Clerk by: email (clerk@thamescentre.on.ca), telephone (519-268-7334), mail (Legislative Services, Municipality of Thames Centre, 4305 Hamilton Road, Dorchester ON N0L 1G3), or [the Accessible Formats Request form](#) on the municipal website.

The Municipality will acknowledge receipt of a request within 5 business days and will provide the requested accessible format or communication support as soon as practicable and at no additional cost (normally within 10 business days unless otherwise agreed).

The Municipality will consult with the requester to determine the most suitable accessible format or support. Records of requests and fulfillment (including format provided and dates) will be retained by Legislative Services in accordance with municipal recordkeeping and privacy requirements

2. Requirements

The Municipality will ensure the general requirements of the Ontario Regulation 191/11 - Integrated Accessibility Standards Regulation (IASR) under the AODA are met in order to achieve accessibility for persons with disabilities.

2.1 Accessibility Policies

The Municipality will establish and maintain one or more policies governing how the organization will achieve the requirements of the IASR. The Municipality will also ensure such documents are available to the public, and in accessible formats upon request. This Policy is adopted in compliance with this obligation.

2.2 Accessibility Plan

The Municipality appoints the Clerk as primary liaison to coordinate with the County of Middlesex on all matters related to the Joint Multi-Year Accessibility Plan (Joint MYAP). This liaison will serve as the main contact for Municipal staff, the Middlesex Accessibility Advisory Committee, and the public, and will ensure timely communication and follow-up on Joint MYAP activities.

The Municipality will implement accessibility measures within its local control that are identified in the Joint MYAP and will report progress to the County. This includes

carrying out locally deliverable projects, maintaining records of initiatives, complaints, and resolutions, and making these records available to the County for review or auditing upon request.

The Municipality will make the County's Joint MYAP readily available to local residents by posting it on the municipal website. The Plan and related materials will be provided in accessible formats and with appropriate communication supports as soon as possible upon request.

The Municipality will actively promote public consultation opportunities related to the Joint MYAP and encourage participation from residents, including persons with disabilities. Municipal staff will contribute data and narrative content for the County's Joint Annual Accessibility Status Report, describing actions taken locally and planned investments.

The Municipality will provide staff training aligned with the Joint MYAP and applicable legislation (e.g., customer service and IASR/AODA requirements). Training completion records will be shared with the County upon request. Finally, the Municipality will identify and communicate local funding, resource needs, and implementation constraints to the County to inform Joint MYAP updates and the required five-year review.

2.3 Procurement of Goods, Services and Facilities

As required by the AODA, when acquiring or procuring goods, services, and facilities, the Municipality must incorporate accessibility criteria and features, and will do so as early as possible in the procurement process. Where it is not practicable to do so, an explanation must be provided upon request, in accordance with the Municipality's Procurement Policy. Ensuring accessibility is incorporated into all procurement activities is the primary responsibility of the departments/divisions who manage these activities and contracts.

2.4 Training

The Municipality will ensure all employees, volunteers (including Council and Committee members), and persons providing goods, services or facilities on the Municipality's behalf receive accessibility training in accordance with the timelines below. Training will be provided in accessible formats and with accommodations on request.

Training content Training must include:

- The purpose of the AODA and the Municipality's related policies
- Requirements of AODA Standards under the IASR (as appropriate to the person's duties)
- The Ontario Human Rights Code as it pertains to persons with disabilities
- How to interact and communicate with persons with various types of disability
- How to interact with persons who use assistive devices, service animals, or require a support person

- How to use equipment or devices available on the Municipality's premises that assist with the provision of goods, services or facilities to persons with disabilities
- What to do if a person with a particular type of disability is having difficulty accessing the Municipality's goods, services or facilities

Role-specific training

- Information and Communications Standards — for employees whose duties involve communicating with, giving information to, or receiving information from others
- Employment Standards — for employees involved in any aspect of the employment cycle, including recruiting, hiring, retaining and exiting
- Design of Public Spaces Standards — for employees involved in building on or making planned alterations to public spaces
- Training may also include how to use and maintain site-specific assistive devices (e.g., TTY, assistive listening devices)

Training timing and frequency

- Mandatory training must be completed by all employees, volunteers, Council and Committee members, and any contractors or third parties providing goods, services or facilities on the Municipality's behalf.
- Initial training: complete accessibility training within 30 calendar days of hire, appointment, or the start of duties.
- Training when duties change: complete role-specific training within 30 calendar days of any significant change to duties that introduce new accessibility responsibilities.
- Refresher training: complete refresher training at least every two years, and whenever there are material changes to the Accessibility Policy, IASR/AODA requirements, or related municipal procedures.
- Training on new or updated equipment, assistive devices, or processes that affect accessibility must be provided as soon as practicable when those changes are implemented.

Training records: Human Resources will maintain training records, including participant name and role, training content, date completed and delivery method.

3. Information and Communications

The Municipality will provide accessible information and communication by preventing and removing barriers and providing accessible formats and/or communication supports to individuals that identify a barrier to accessibility.

This section of the Policy addresses the Municipality's requirements of the IASR Information and Communications Standards under the AODA.

3.1 Feedback

The Municipality welcomes feedback on how it provides accessible customer service, and to comment on the goods, services, or facilities offered by the Municipality. Customer feedback will help us identify barriers and respond to concerns. Feedback may be provided in the following ways:

a) **By mail addressed to:**

Legislative Services Department
Municipality of Thames Centre
4503 Hamilton Road
Dorchester ON N0L 1G3

b) **By telephone:** 519-268-7334

c) **By website** form using the [Feedback Form](#)

The Feedback Form is part of the Municipality's Accessibility Standards for Customer Service and is available on the Municipal website. Feedback is encouraged to help identify areas where changes need to be considered and ways the Municipality can improve the delivery of goods, services and facilities.

All feedback, regardless of how it is received, should be directed initially to the Clerk for the feedback to be reviewed and identified as a complaint, suggestion or compliment. The feedback process is as follows:

- Customers may request assistance when providing feedback.
- Feedback should include the date, description, any suggestions by the customer on how to resolve if there was an issue, and personal contact information if they wish to be contacted.
- The Clerk will maintain a record outlining the details, follow-up and actions to be taken;
- If the feedback form indicates that the customer wishes to be contacted, Clerk will acknowledge receipt of the feedback within 5 business days;
- Where possible, complaints will be acknowledged and addressed immediately;
- The Clerk will forward feedback to appropriate Director/Manager;
- The Director/Manager will determine appropriate action;
- The Director/Manager will review barriers identified in the feedback and determine if it is feasible to remedy the barrier;
- The Director/Manager will advise the Clerk of the decision and reasons for it;
- The Clerk will advise the person who submitted the feedback of the decision and reasons for it within thirty (30) business days.

- If agreement on the resolution of a concern cannot be reached between the appropriate Manager/Director or designate, the complainant has the option of presenting the concern to Council for final disposition.

The Municipality ensures the feedback process is accessible to persons with disabilities by providing or arranging for accessible formats and communication supports, on request.

3.2 Accessible Formats and Communication Support

The AODA requires that all information and communications that the Municipality produces directly, that is available online for the public to access, must be made accessible. Information and communications that are directly or indirectly produced through contractual relationships may be made available in an alternate accessible format and/or communication supports, upon request.

The Municipality will advise the public of the availability of accessible formats and/or communication supports in the Accessibility Policy, Joint Multi-Year Accessibility Plan, and other documents where it is deemed necessary to include. The public can make a request by submitting the Accessible Formats and Communication Supports Request Form located on the website [Accessibility](#) page, or contacting the Clerk.

When an alternate accessible format and/or communication support is requested, the Municipality must consult with the person making the request to determine which format or support is required, and provide or make arrangements to provide the material in a reasonable amount of time and at no additional cost to the requestor.

IASR Information and Communication Standards do not apply to products and product labels, unconvertible information or communications, and information that the Municipality does not control directly or indirectly through a contractual relationship.

If the information or communication is determined to be unconvertible, the Municipality must provide the person requesting the information or communication with:

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

3.3 Emergency Procedures, Plans or Public Safety Information

The Municipality shall provide all existing public emergency procedures, plans and public safety information, upon request in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

3.4 Accessible Websites and Web Content

The AODA requires that the Municipality's Internet website and web content, controlled directly by the Municipality or through a contractual relationship that allows for modification of the product, must conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, in accordance with the schedule set out in the IASR.

The Legislative Services Department is responsible for establishing and maintaining procedures, standards and guidelines to ensure all Internet websites and web content is accessible.

Any department or division that manages their content on the municipality's website are responsible for ensuring accessibility based on approved procedures, standards and guidelines, with support from the Legislative Services Department.

3.5 How to Request Accessible Formats/Contact

Requests for accessible formats or communication supports may be made to the Clerk by:

- Email: clerk@thamescentre.on.ca
- Telephone: 519-268-7334
- Mail: Legislative Services, Municipality of Thames Centre, 4305 Hamilton Road, Dorchester ON N0L 1G3
- Online: [Accessible Formats Request](#) form on the municipal website

When making a request, please specify the document or information required and the format or support preferred (e.g., large print, braille, audio file, plain-language summary, accessible electronic format, sign language interpreter). The Municipality will:

- Acknowledge receipt of the request within 5 business days;
- Consult with the requester as needed to determine the most suitable format or support;
- Provide the requested accessible format or communication support as soon as practicable and at no additional cost (normally within 10 business days unless otherwise agreed).

Records of requests and fulfillment (including formats provided and dates) will be maintained by Legislative Services in accordance with municipal recordkeeping and privacy requirements. See subsection 1.1 (Policy Accessibility & Request Process) for the policy availability statement.

4. Employment

The Municipality will foster an inclusive workforce and provide equitable treatment and accommodation to ensure barrier-free employment.

4.1 Recruitment and Selection

The Municipality will post information about the availability of accommodations for internal and external job applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing will be notified that accommodation is available on request.

The Municipality will consult with any applicant who requests accommodation. In accordance with the *Ontario Human Rights Code*, the Municipality will provide or arrange suitable accommodation in a timely manner, taking into account the applicant's accessibility needs related to disability.

Successful applicants will be notified about the Municipality's policies for accommodating employees with disabilities as part of their offer of employment.

4.2 Employee Supports

Municipal employees will be made aware of the policies used to support employees with disabilities and accommodations available in accordance with the *Ontario Human Rights Code* and the Municipality's Workplace Accommodation Procedure.

The Municipality provides this information to new employees through employment agreements and orientation materials. It will also provide updated information to all employees whenever there are changes to existing policies related to job accommodation for accessibility needs arising from disability.

4.3 Accessible Formats and Communication Supports for Employees

In accordance with the *Ontario Human Rights Code* and the Municipality's Workplace Accommodation Procedure, upon an employee's request, the Municipality will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed to perform the employee's job
- Information that is generally available to employees in the workplace.

The Municipality will consult with the employee making the request in determining the suitability of an accessible format or communications support.

4.4 Workplace Emergency Response Information

The Municipality will provide individualized emergency response information to employees who identify potential accessibility barriers when responding to emergency situations. Information on an Individualized Workplace Emergency Response Plan must be provided to the employee as soon as practicable after becoming aware of the need for accommodation due to the employee's disability.

If the employee requires assistance, the Municipality must receive consent from the employee to provide the individualized emergency response information to the person(s) designated to provide assistance. The information must be reviewed when

the employee moves to a different location, when the employee's accommodation needs change, when overall accommodation plans are reviewed and when the Municipality reviews its general emergency response plan.

4.5 Individual Accommodation Plans

The Municipality's Workplace Accommodation Procedure describes the mandatory process for the development and maintenance of documented individual accommodation plans to support employees with disabilities. The process set out in the procedure meets requirements of the AODA. If applicable, individual accommodation plans may include information regarding plans for accessible formats and communication supports, as well as individualized workplace emergency response information.

4.6 Return to Work Process

To ensure safe, timely and supported reintegration into the workplace, the Municipality's Return to Work Procedure describes the process for employees returning to work following absence due to an illness or injury where disability-related accommodation and/or transitional support is required. This process is supported by Human Resources, consistent with the collective agreements and established return to work protocols.

4.7 Performance Management, Career Development and Redeployment

The Municipality will ensure that employees with disabilities or individual accommodation plans are provided equitable access to career development, performance management and redeployment opportunities.

5. Built Environment and Public Spaces

The Municipality will ensure accessibility at all its facilities and public spaces by designing with accessibility in mind.

5.1. Accessibility Requirements in Codes and Standards

The *Ontario Building Code*, which has a section on Barrier-Free Design, and the AODA, IASR Design of Public Spaces Standards are both standards to which the Municipality must adhere. These standards establish the minimum threshold for accessibility in the built environment.

5.2. Obtaining Services

When constructing or replacing service counters, fixed queuing guides and waiting areas, the AODA requires the Municipality to make them accessible to persons with disabilities.

5.3. Maintenance of Accessible Elements

The AODA requires the Municipality to develop and implement procedures for preventative and emergency maintenance and temporary disruptions of accessible elements in public spaces.

5.4. Public Consultation

The AODA requires the Municipality to provide opportunity for public consultation on the development or re-development of public spaces, including:

- Recreation trails
- Outdoor public eating areas like rest stops or picnic areas
- Outdoor play spaces, like playgrounds in provincial parks and local communities
- Accessible off-street parking
- Accessible on-street parking

This consultation is completed through the Middlesex Accessibility Advisory Committee, operated by the County of Middlesex.

6. Customer Service

6.1. Assistive Devices

The Municipality shall allow people with disabilities to use their own assistive devices to obtain, use or benefit from the goods, services, and facilities offered by the Municipality.

In circumstances where a person with a disability is unable to access the Municipality's services through the use of their own personal assistive device, the Municipality must assess service delivery and potential service options to meet the needs of the individual, in accordance with the *Ontario Human Rights Code*.

Where Municipally owned assistive devices are available, the AODA requires that they must be kept in good working order and the public must be informed of their availability. Employees within the applicable division must be trained in the application and use of the devices.

6.2. Support Person

The Municipality allows persons with disabilities to be accompanied by a support person in all municipally owned and operated public facilities. Where fees are charged, employees shall ensure the fee is waived for the support person. If there is confidential information to be disclosed, consent must be received from the person with the disability.

The Municipality reserves the right to request a person with a disability to be accompanied by a support person, in the event that it is considered necessary to protect

the health and safety of the person with a disability or others on the premises.

This should only occur where after consulting with the person it is determined that based on the person's needs and available evidence:

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

The assessment of the risk is based on considerations of the duration of the risk, nature and severity of the potential harm, likelihood the potential harm will occur, and imminence of the potential harm. Any considerations on protecting health and safety must be based on specific evidence and not on assumptions. The Municipality will ensure the person is supported while respecting the dignity of the individual.

6.3. Service Animals

The Municipality welcomes persons with disabilities and their service animals. Service animals are allowed on the parts of the premises that are open to the public and third parties.

When the Municipality cannot easily identify that an animal is a service animal, employees may ask for documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

In the event the service animal is excluded by law, such as in a food preparation area, the Municipality must ensure other measures are available to enable the person with a disability to obtain, use or benefit from municipal goods, services, and facilities. Employees will respectfully explain why the animal is excluded and determine what other arrangements can be made.

It is the responsibility of the person with the disability to maintain care and control of the service animal, at all times. In the unlikely circumstance that control is unable to be maintained, the person with the disability will be informed they must regain control. If the animal is acting in a manner that causes health and safety concerns, employees may request the animal be removed from the situation or premises until such time that care and control is resumed. In addition, the Municipality will consider alternate accommodations for the person in such circumstances, and ensure access to goods and services is provided.

General Information

- Service animals are specially trained to assist a person with a disability. They might open doors, pick up items, predict seizures, alert to sounds, etc.
- Service animals may be dogs or other types of animals.
- Service animals are not pets — they are working animals. Do not pet or

talk to a service animal.

- Service animals provide a vital service; they are allowed to be with their owner at all times, unless otherwise prohibited by law, or a health and safety risk is present and unable to be mitigated.

Service animals in training will be welcome in all Municipal owned facilities, provided they adhere to all procedures relating to service animals.

6.4. Notice of Temporary Service Disruptions

Temporary service disruptions in municipal services or facilities may occur due to reasons that may or may not be within the Municipality's control or knowledge.

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, the Municipality will make reasonable efforts to notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Notice must be given by posting the information in a prominent place on premises owned or operated by the provider, posted on the Municipality's website or social media, included on telephone recordings, or by other methods as is reasonable under the circumstances. Planned service disruptions that are intended to last more than 48 hours will be posted on the Municipality's website. Contact information will be provided when applicable

7. AODA Reporting Requirements

The Municipality must submit completed Accessibility Compliance Reports to the Ministry for Seniors and Accessibility every two years, in accordance with the schedule set out in the AODA.

8. Contraventions

Failure to comply with this Policy may result in disciplinary action, up to and including dismissal. The Municipality's failure to comply with AODA may result in significant fines and reputational damage

Policy Review

This policy will be reviewed every four years or as needed.

Revisions Table

Revision Number	Revision Date	Description of Revisions	Author
1	January 9, 2017	Incorporation of IASR, updates to definitions (Service Animal)	M. Alexander
2	September 28, 2026	Full review with updates to: • Employment Standards & Internal Culture • Enhances feedback and accountability • Information, Communications & Website • Consultations with MAAC	