

Corporate Policy

POLICY NAME:	Corporate Accessibility Policy & Procedures
POLICY NUMBER:	XI AC-1.01
CATEGORY:	Accessibility
ACCOUNTABILITY:	All employees, elected and appointed officials, volunteers, agents and others working on behalf of the County of Perth
RELATED POLICIES:	
APPROVED BY:	County Council
EFFECTIVE DATE:	December 18, 2025
LAST REVIEWED:	December 18, 2025
NEXT REVIEW:	This policy will be reviewed periodically to ensure its effectiveness and compliance with changes in legislation, organizational practices, and industry standards.

POLICY STATEMENT

At the County of Perth, we are committed to providing equal treatment to people with disabilities with respect to the use and benefit of County services, programs, goods and facilities in a manner that respects their dignity, independence, integration and is equitable in relation to the broader public. This commitment extends to residents, employees, visitors and other stakeholders with visible and non-visible disabilities.

This policy provides guidance on how the County of Perth ensures all goods, services, programs and facilities are approached in an inclusive manner that considers the needs of persons with disabilities.

This policy replaces **Section XI-Policy Number AC-1.01, Corporate Accessibility Policy & Procedures** to streamline the policy and to better incorporate all provincially mandated accessibility standards outlined in the *Accessibility for Ontarians with Disabilities Act 2005*, S.O. 2005, c. 11 (the AODA).

PURPOSE

This policy is intended to provide the overarching framework to guide, review and develop other County policies, procedures, By-laws and guidelines, to comply with standards developed under the *Accessibility for Ontarians with Disabilities Act 2005*, S.O. 2005, c. 11. The AODA presented a goal of an accessible Ontario by 2025 through mandatory and enforceable accessibility standards including the:

- Customer Service Standard
- Information and Communications Standard
- Employment Standard
- Transportation Standard
- Built Environment Standard

The Customer Service Standard came into effect (Ontario Regulation 429/07) on January 1, 2008, and the County of Perth has complied with this standard since January 1, 2010.

The following three standards – Information and Communications, Employment, and Transportation – are all part of the Integrated Accessibility Standard Regulation or IASR (Ontario Regulation 191/11), which aligns with the Province of Ontario’s intent to “streamline, align and phase-in accessibility requirements and allow for progress on accessibility and reduce the regulatory burden for obligated organizations”.

There are also a number of General Requirements which refer to the Establishment of Accessibility Policies, Multi-year Accessibility Plans, Procuring or Acquiring Goods, Services or Facilities, Self-Service Kiosks and Training, all of which are an integral part of the IASR. This regulation came into force July 1, 2011.

The accessibility standards for the Built Environment focus on removing barriers in two areas:

1. Public Spaces: The Design of Public Spaces Standard became law in December 2012. This standard applies only to new constructions or major renovations being designed for outdoor elements.
2. Buildings: Ontario's Building Code has been amended to include enhancements to accessibility in buildings. As of January 1, 2015, new construction and renovations will be subject to updated accessibility requirements.

SCOPE

This policy applies to all County employees (including Library Boards) volunteers, agents, those who develop policies and govern the provision of goods, services or facilities to the public or other third parties on behalf of the County, in accordance with the legislation.

DEFINITIONS

Accessibility – a general term used to describe the degree of ease that something (e.g. device, service, environment) can be used and enjoyed by persons with a disability. The term implies conscious planning, design and/or effort to ensure it is barrier-free to persons with a disability, and by extension, highly usable and practical for the general population as well.

Accessible Formats – may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Barrier – means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including physical barriers, architectural barriers, an information or communications barrier, and an attitudinal barrier, a technological barrier or a policy or practice.

Communication Supports – may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Disability – is defined, per Section 2 of the *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11* and the 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.*”

Kiosk – an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

Service Animals – are defined, per Subsection 80.45 (3) of the Integrated Accessibility Standards, O. Reg. 165/16, as follows:

“an animal is a service animal for a person with a disability:

- a. if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- b. if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.”

Support Person – is defined, per Subsection 80.45 (3) of the Integrated Accessibility Standards, O. Reg. 165/16, as follows: “a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.”

Unconvertible – information or communications are unconvertible if it is not technically feasible to convert the information or communications or the technology to convert the information or communications is not readily available.

GOALS

The County of Perth seeks to ensure accessibility for both our employees and the public we serve across all services, products, and facilities. We aim to create an environment where employees can perform effectively, and residents can access timely, high-quality services in a way that suits their needs. We are committed to delivering exceptional public service to all residents of and visitors to Perth County, reflecting the diversity of the community in everything we do.

OBJECTIVES

At the County of Perth, we are committed to providing equal treatment to people with disabilities with respect to the use and benefit of County services, programs, goods and facilities in a manner that respects their dignity, independence, integration and is equitable in relation to the broader public. This commitment extends to residents, employees, visitors and other stakeholders with visible and non-visible disabilities.

This policy provides guidance on how the County of Perth ensures all goods, services, programs and facilities are approached in an inclusive manner that considers the needs of persons with disabilities.

This policy replaces **Section XI-Policy Number AC-1.01, Corporate Accessibility Policy & Procedures** in order to incorporate into one policy all of the standards outlined in *the Accessibility for Ontarians with Disabilities Act 2005, S.O. 2005, c. 11* (the AODA).

POLICY

Policy Requirements

General Standards

The County of Perth is a large designated public sector organization under the AODA and is committed to meeting the accessibility needs of persons with disabilities.

This policy, Corporate Accessibility, is to function as an umbrella policy for the requirements and standards developed under the AODA.

Accessibility Advisory Committee

The County of Perth and its Lower Tier Municipalities have established an advisory committee with a majority of individuals whom are persons with disabilities. The Joint Accessibility Advisory Committee (JAAC), with the guidance of the Clerk or designate of the Legislative Services Division, shall advise Council about the requirements and implementation of the AODA accessibility standards, preparation of accessibility reports, including access for persons with disabilities to a building or premises, awareness and education and other matters for which Council may seek advice and consultation.

Accessibility Planning

The County of Perth will establish, implement, maintain and document a Multi-year Joint Accessibility Plan in consultation with persons with disabilities and the municipal accessibility advisory committee, in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005*. The Joint Multi-Year Accessibility Plan will outline the ways the County of Perth and its Lower Tier Municipalities will prevent and remove barriers and meet the requirements of the standards developed under the *Accessibility for Ontarians with Disabilities Act, 2005*. The plan will be posted on the County's website and shall be made available in an accessible format and with communication supports, upon request. Progress on the implementation of the plan will be provided annually in the County of Perth Joint Accessibility Plan update report to Council. The accessibility plan shall be reviewed and updated at least once every five (5) years.

Accessible Formats and Communication Supports

Except as otherwise provided in the AODA, the County of Perth shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide, accessible formats and communication supports for persons with disabilities.

Documentation

Documentation that describes this Policy and each of its requirements shall be maintained on the County of Perth's intranet for employee reference, and on the County of Perth's website www.perthcounty.ca, and provided to individuals in an accessible format or communication support, upon request. Review and amendments of this document will be the responsibility of the Clerk or designate, in consultation with the Human Resources and CAO.

Feedback

The ultimate goal of the County of Perth is to meet and surpass customer expectations while serving customers with disabilities. Comments on the County's services regarding how well those expectations are being met are welcomed and appreciated.

The County of Perth will, upon request, provide or arrange for the provision of accessible formats and communication supports to facilitate public input, feedback, or consultation, where feasible and in a timely manner.

Feedback regarding accessibility can be submitted by phone, email, in person, or through an online form (found here: <https://www.perthcounty.ca/en/county-government/customer-service.aspx>). All feedback will be directed to the appropriate staff member, with follow-up coordinated by the Legislative Services Division, as required.

Phone: 519-271-0531

Email: clerk@perthcounty.ca

Mail: Legislative Services

Corporation of the County of Perth 1 Huron Street
Stratford, ON N5A 5S4

Procurement of Goods, Services, Facilities and Kiosks

Whenever possible, County of Perth staff will consider the accessibility features and criteria of goods, services, and facilities procured, purchased, or acquired. When not feasible to incorporate accessibility criteria and features when procuring goods, services or facilities, staff shall provide, upon request, an explanation.

Training

- i. All County employees, volunteers, councillors, contractors, and other third parties who provide goods, services, programs, or facilities on behalf of the County of Perth shall receive training on the purpose and requirements of:
- ii. Accessibility for Ontarians with Disabilities Act (AODA), 2005;
 - a. Ontario Regulation 429/07 Accessible Standards for Customer Service, 2007;

- b. Ontario Regulation 191/11 Integrated Accessibility Standards Regulation (IASR), 2011; and
 - c. The Ontario Human Rights Code (as it pertains to persons with disabilities).
- iii. Training provided shall be appropriate to the duties and responsibilities of the individual.
- iv. Training will be provided as soon as possible after the individual is hired, retained, or appointed. It will be integrated into the County's orientation process and overseen by the Clerk or designate, including for students and volunteers.
- v. The County shall maintain records of all completed training, including the name of the individual, their role, the training content, and the date of completion.
- vi. Training for County Councillors will occur at the lower-tier level.
- vii. Committee members who are not a part of staff or council (citizen members) will receive training as soon as possible following their appointment.
- viii. When changes are made to accessibility legislation, County policies, or procedures, additional training shall be provided as soon as practicable.
- ix. Contractors and service providers delivering goods, services, or facilities on behalf of the County may be required to confirm their compliance with AODA training requirements by signing an Accessibility Compliance Agreement or providing proof of completed training.

Non-Compliance

For employees, failure to comply with this policy may result in disciplinary action up to and including termination.

For all other persons representing the County of Perth as elected or appointed officials, action will be determined by Council for failure to comply with this policy.

Customer Service Standard

At the County of Perth, we are committed to providing equal treatment to people with disabilities with respect to the use and benefit of County services, programs, goods and facilities in a manner that respects their dignity, independence, integration and is equitable in relation to the broader public. This commitment extends to residents, employees, visitors and other stakeholders with visible and non-visible disabilities.

Assistive Devices

- i. County employees, volunteers and third-party contractors shall accommodate the use of personal assistive devices including but not limited to, wheelchairs, canes, walkers, scooters, Braille displays and communication boards.
- ii. Should a person with a disability be unable to access the County's services through the use of their own personal assistive device, the County of Perth will:
 - Assess service delivery and identify options to meet the needs of the individual; and
 - Provide information on alternative services and methods of access, either temporarily or on a permanent basis.
- iii. Assistive devices that are purchased or provided by the County to support access to specific programs and services will be maintained in good working order, and their availability will be

communicated to the public. County staff responsible for service delivery will receive appropriate training on the use of all assistive devices at the location(s) in which they provide service.

- iv. An instruction manual for County-provided assistive devices is available upon request.

Notice of Service Disruption

- i. In the event that there is a temporary service disruption in the availability of facilities, programs, services or goods used by persons with disabilities (for example, temporary loss of elevator service), the County shall provide public notice. This notice will include:
 - a. The reason for the disruption,
 - b. The anticipated duration
 - c. The expected start and end dates
 - d. A description of alternative services or actions, if any, that are available.
- ii. Notices will be provided as early as possible, and in the case of unplanned disruptions, as soon as feasible. Notifications may be posted:
 - a. On the affected premises in visible locations
 - b. At other relevant County facilities
 - c. On the County's website (www.perthcounty.ca)
 - d. Through other communication channels such as social media, local newspapers, or radio, where appropriate
- iii. Notice will be provided in accessible formats, upon request.

Service Animals

County employees, volunteers and third-party contractors shall accommodate the use of service animals by people with disabilities who are accessing County services or goods unless the animal is otherwise excluded by law, such as food preparation areas as prohibited by Food Premises, R.R.O. 1990, Reg. 562 under the *Health Protection and Promotion Act, R.S.O. 1990, c. H.7.*

In the case where a service animal is excluded from the premises by law, the County will ensure that other measures are available to enable the person with the disability to obtain or benefit from the use of the County's goods and services.

This could include:

- i. Offering the person with a disability a safe place for their animal to remain while obtaining goods or services, along with personal support in obtaining the goods and services; or
- ii. Offering goods and services at an alternate location that allows for service animal accompaniment.

Support Persons

- i. Where a person with a disability accessing County goods or services is accompanied by a support person, employees, volunteers and third-party contractors shall ensure that both persons are permitted to enter the premises together and shall ensure that the person with a disability can access the support person while on the premises.

- ii. If a fee is required for admission to the premises or in connection with a person's presence at the premises, the County of Perth will waive the fee for support persons. Furthermore,
 - a. All advertising indicating the fee amounts will also indicate the fees do not apply to support persons.
 - b. Members of the public should notify a staff member about the presence of a support person.
- iii. When attended by a support person, consent from the person being supported must be obtained prior to disclosing confidential information.
- iv. Support persons may be required to sign a confidentiality agreement in some situations.
- v. The County of Perth 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 the disability or others on the premises.

Information and Communications Support Standard

Accessible Websites and Web Content

Internet websites and web content controlled directly by the County of Perth or through a contractual relationship that allows for modification of the product shall conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA in accordance with the schedule set out in the AODA Integrated Accessibility Standards.

Communication

- i. County employees, volunteers, and third-party contractors shall communicate with people with disabilities in a manner that takes into account the individual's specific needs and communication preferences.
- ii. The County will ensure that staff who regularly interact with members of the public or third parties are trained on how to communicate effectively with people with a wide range of disabilities.
- iii. Contractors providing services on behalf of the County must confirm that their staff have received accessibility training in accordance with Ontario Regulation 429/07.
- iv. The County will offer multiple communication methods to support accessible service delivery. Individuals will be encouraged to select the format or method that best meets their needs.
- v. Upon request, the County will provide or arrange for the provision of accessible formats and communication supports in a timely manner, at no additional cost to the individual. Staff will consult with the person making the request to determine the most appropriate format or support. A request form for alternative formats is available upon request or may be completed with assistance from staff.

Format of Documents and Information

- i. The County of Perth will notify the public that accessible formats and communication supports are available upon request.

- ii. Upon request, the County will provide documents (e.g., forms, print materials, bills) or the information contained within them in a format that considers the person's disability.
- iii. The County will consult with the individual to determine the most appropriate and reasonable format or communication support.
- iv. Timeframes for providing alternate formats may vary based on factors such as media type, document size and complexity, and the quality of the original material. However, documents will be provided in a timely manner.
- v. If the information is required before the alternative format is available, the County will ensure the information is communicated in an accessible manner in the interim.
- vi. No additional fees will be charged for accessible formats beyond what is charged for the original document, if applicable.

Emergency Procedures, Plans and Information

The County shall provide all existing public emergency procedures, plans and public safety information, upon request, in an accessible format or with appropriate communication supports in a timely manner.

Terminology

When referring to people with disabilities, County employees, volunteers and third-party contractors shall use terminology that adheres to guidelines provided in the County of Perth Accessibility Training for Customer Service.

Employment Standard

Recruitment

The County of Perth will notify job applicants of the availability of accommodations during the recruitment process. Applicants selected for interviews or testing will be informed that accommodations are available upon request. Where an accommodation is requested, the County will consult with the applicant to provide appropriate supports. Successful applicants will be notified of the County's accessibility policies as part of their offer of employment.

Employee Supports

The County will inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that consider an employee's accessibility needs due to disability. The County will provide this information to new employees as soon as practicable after they begin their employment, and updated information will be provided to all employees whenever there is a change to existing policies on the provision of job accommodations.

Accessible Formats and Communication Supports for Employees

Upon request, the County will consult with employees to provide or arrange for the provision of accessible formats and communications supports for:

- a. information that is needed in order to perform the employee's job; and
- b. information that is generally available to employees in the workplace.

The suitability of the accessible format or communication support will be determined in consultation with the employee.

Workplace Emergency Response Information

Where an employee has a disability and the County is aware that individualized emergency response information is required, that information will be provided as soon as practicable. With the employee's consent, this information will also be shared with the person(s) designated to assist them in an emergency.

The emergency response information will be reviewed:

- When the employee moves to a different work location;
- When the employee's overall accommodation needs or plan are reviewed; and
- When the County reviews its general emergency response policies.

Note: Templates for individualized emergency response plans are available for internal use and maintained by the Joint Health & Safety Committee and Human Resources Divisions.

Documented Individual Accommodation Plans

The County will maintain a written process for developing and maintaining individual accommodation plans for employees with disabilities, upon request. These plans will include:

- Information on accessible formats and communication supports; and
- Individualized workplace emergency response information, if applicable.

Return to Work Process

The County will maintain a documented return-to-work process for employees who are absent due to disability and require accommodations to return. This process outlines the steps the County will take to support an employee's return to work.

See County of Perth Health & Safety Manual – Policy 9.1: *Early and Safe Return to Work*.

Performance Management and Career Development and Redeployment

The County will consider the accessibility needs of employees with disabilities as well as any individual accommodation plans when applying performance management processes, considering career development opportunities, and during redeployment.

Transportation Standard

The County of Perth does not currently licence any conventional, specialized or public transportation services, nor does the County licence taxicabs. As a result, the County of Perth has no obligations to meet under the Transportation Standard of the IASR.

However, the County of Perth is committed to ensuring that people with disabilities have information on accessible public transportation services available within the County. In order to meet this commitment, the Clerk or designate may communicate with the lower tier municipalities, the City of

Stratford and the Town of St. Marys, and surrounding areas within the County of Perth to aid on accessible public transportation services.

Built Environment Standard

The Built Environment Standard helps to remove barriers for persons with disabilities in outdoor public spaces and buildings.

Design of Public Spaces:

Ontario Regulation 413/12 made under the *Accessibility for Ontarians with Disabilities Act, 2005*, was published on December 17, 2012. This regulation amends Ontario Regulation 191/11, the Integrated Accessibility Standards Regulation (IASR) by adding the following part:

- a. Part IV.1 Design of Public Spaces Standards (Accessibility Standards for the Built Environment).

As a large public sector organization, this Part applies to the County of Perth and its Lower Tier Municipalities and applies, except as otherwise specified, to public spaces that are newly constructed or redeveloped on and after January 1, 2016, and that are covered by this Part.

The County of Perth is committed to incorporating accessibility features into the design and redevelopment of public spaces. Where applicable, the County will follow the requirements outlined in the AODA's Design of Public Spaces Standard, the Ontario Building Code, and applicable planning legislation.

Accessibility considerations are included in site plan reviews, new construction, and redevelopment projects involving elements such as exterior paths of travel, parking areas, recreational trails, and public seating areas.

Ontario Building Code (*Building Code Act, 1992, S.O. 1992, c. 23*)

On January 16, 2025, Ontario Regulation 163/24 was filed to amend the new 2012 Building Code, O.Reg. 332/12.

The effective date of the amendment is January 1, 2025.

The amended requirements will substantially enhance accessibility in newly constructed buildings and existing buildings that are to be extensively renovated.

Responsibilities

The Clerk or designate in the Legislative Services Division is responsible for reviewing this Policy once a term and recommending amendments to ensure continued compliance with regulated accessibility standards and legislated obligations.

- The Clerk or designate shall provide advice and direction on the implementation of this Policy.
- The Clerk or designate shall provide training to new employees and existing staff on understanding this Policy.

- Supervisors and managers shall ensure that they and their staff are familiar with and comply with this Policy.
- County Council and staff are responsible for adhering to the parameters of this policy and for ensuring needs of persons with disabilities are addressed in goods, services, programs and facilities.

References

[Ontarian's with Disabilities Act \(ODA\)](#)

[Accessibility for Ontarians with Disabilities Act AODA](#)

[AODA Customer Service Regulation](#)

[AODA Integrated Accessibility Standards Regulation](#)

[County of Perth Accessibility Policy and Procedures Manual: Accessible Customer Service](#)

Legislative and Administrative Authorities

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 – ADD ODA

Human Rights Code, R.S.O. 1990, c. H.19

Integrated Accessibility Standards, O. Reg. 191/11

Ontarians with Disabilities Act, 2001, S.O. 2001, c. 32

Inquiries

For further information regarding this Policy, contact:

County of Perth, Legislative Services Division

Phone: 519-271-0531

Email: clerk@perthcounty.ca

Mail: Legislative Services Division
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1 Huron Street
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