



## RELATED DOCUMENTATION

Legislation	<ul style="list-style-type: none"><li>• Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, C.11</li><li>• Integrated Accessibility Standards, O. Reg. 191/11</li><li>• Accessibility Standards for Customer Service, O. Reg. 429/07</li><li>• Employment Standards Act, 2000, S.O. 2000, c. 41</li><li>• Ontario Building Code, O. Reg. 332/12</li><li>• Ontario Human Rights Code, R.S.O. 1990, C.H.19</li></ul>
Collective Agreement	
Forms	<ul style="list-style-type: none"><li>• Accessibility Form</li></ul>
Policies	
Other Resources	<ul style="list-style-type: none"><li>• Ontario Human Rights Code, R.S.O. 1990, C.H.19</li></ul>

## PURPOSE

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is a provincial law enacted to develop, implement, and enforce accessibility standards across Ontario. The goal is to achieve a fully accessible province by January 1, 2025, in key areas including customer service, information and communications, employment, transportation, and the built environment.

This policy reflects London and Middlesex Community Housing's (LMCH) commitment to compliance with all AODA standards and covers:

- Provision of goods and services to persons with disabilities
- Use of assistive devices, service animals, and support persons
- Communication and information accessibility
- Notice of service disruptions
- Training
- Feedback
- Documentation availability and format
- Built environment accessibility (Design of Public Spaces Standard)

## SCOPE

This policy applies to all LMCH employees, board members, agents, contractors, volunteers, students, and any person who interacts with the public or participates in policy development on behalf of LMCH.



## DEFINITIONS

**"Accessibility Standard"** means an accessibility standard made by regulation under section 6 of the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, C.11.

**"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 a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

**"Disability"** means,

(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 impairment, deafness or hearing impairment, 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.

In addition, the definition of disability under the Ontario Human Rights Code, R.S.O. 1990, c. H. 19, may include but is not limited to:

- Acquired Brain Injury
- Deaf, deafened, hard-of-hearing
- Low vision or blind
- Chronic health conditions (cancer, epilepsy, heart disease, etc.)

**"Organization"** means any organization in the public or private sector and includes,

(a) the Government of Ontario and any board, commission, authority or other agency of the Government of Ontario,

(b) any agency, board, commission, authority, corporation or other entity established under an Act,

(c) a municipality, an association, a partnership and a trade union, or



---

(d) any other prescribed type of entity; ("organisation")

## POLICY STATEMENT

London and Middlesex Community Housing (LMCH) is committed to providing equitable and inclusive access to all services and facilities. Services will be provided in a manner that respects the dignity, independence, integration, and equal opportunity of all individuals. LMCH will engage and consult with stakeholders, tenants and employees with disabilities in the development of its accessibility policies, plans, and programs.

## CORE PRINCIPLES

In alignment with LMCH's core values of Collaboration, Accountability, Responsiveness, and Equite, the implementation of this Accessibility Policy will be guided by the following principles:

**Dignity:** All tenants, staff, and members of the public will be treated with respect and consideration. LMCH will provide services in a manner that upholds the dignity of individuals with disabilities, recognizing their value as equal participants in our community.

**Independence:** LMCH is committed to fostering autonomy for individuals with disabilities. Programs, services, and facilities will be delivered in a way that allows for personal choice and freedom, while respecting safety and privacy. Where accommodations are needed, LMCH will explore practical alternatives that maintain independence.

**Equity and Equal Access:** Tenants, staff, and visitors with disabilities will have equitable access to LMCH's housing, services, and employment opportunities. This means not only removing barriers but actively ensuring that everyone achieves comparable outcomes in their interactions with LMCH.

**Integration and Inclusion:** LMCH will deliver programs and services in a way that enables full participation by individuals with disabilities. Wherever possible, services will be offered in the same spaces and in similar ways as for individuals without disabilities. Our focus will be on creating inclusive environments and eliminating systemic and physical barriers.

## GOVERNANCE & LEGISLATION

LMCH is committed to meeting, and wherever possible, exceeding the legislative requirements set out under provincial law to support accessibility for people with disabilities.



---

These laws form the foundation of LMCH's accessibility practices and inform all related policies, procedures, and service delivery frameworks.

## Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

The AODA came into effect in 2005 with the goal of achieving full accessibility in Ontario by 2025. It enables the development of enforceable accessibility standards aimed at identifying, removing, and preventing barriers in key areas such as customer service, information and communications, employment, transportation, and the built environment. LMCH aligns all accessibility-related policies and practices with the requirements outlined in the AODA.

## Integrated Accessibility Standards Regulation (IASR)

The IASR (Ontario Regulation 191/11), enacted under the AODA in 2011, consolidates multiple standards under a single regulation. It sets phased requirements in the areas of:

- Employment – inclusive and accessible hiring and workplace practices.
- Information and Communications – accessible formats and communication supports.
- Design of Public Spaces – accessible outdoor paths, parking, and public areas.

## Accessibility Standards for Customer Service (ASCS)

While Ontario Regulation 429/07 was revoked and integrated into the IASR, LMCH maintains its commitment to the principles outlined in the original Customer Service Standard. These include respect for dignity, independence, integration, and equal opportunity in the delivery of services. LMCH continues to provide relevant training to all staff and ensures accessible service delivery practices remain in effect.

## Employment Standards Act, 2000 (ESA)

The ESA outlines the rights and responsibilities of both employers and employees in Ontario. LMCH ensures full compliance with all ESA provisions related to accessibility and accommodation, particularly as they pertain to the hiring, support, and retention of staff with disabilities.

## Ontario Human Rights Code (OHRC)

The OHRC guarantees the right to equal treatment and freedom from discrimination on several grounds, including disability. LMCH upholds the principles of the Code and applies them across all housing services, employment practices, and organizational activities.

## Ontario Building Code (OBC)



---

The OBC contains provisions for the design and construction of buildings that are accessible and barrier-free. LMCH adheres to the standards set out in the Code when developing new properties or undertaking renovations. Our commitment is to ensure physical spaces are accessible to all tenants and members of the public by or before the 2025 compliance deadline.

## ACCESSIBILITY FOCUS AREAS

LMCH is committed to identifying and removing barriers to accessibility across its services, facilities, housing units, and employment practices. Our approach is grounded in dignity, respect, and inclusion, and is guided by current legislative requirements and best practices in the housing sector. The following key focus areas reflect our commitment to ensuring equitable access and participation for people with disabilities.

### Accessible Customer Service

LMCH delivers customer service in a way that is inclusive, barrier-free, and responsive to the needs of individuals with disabilities. Policies and procedures related to accessible customer service include:

- **Accessible Customer Service Policy**  
Reflects the principles of respect, dignity, and equal access. This policy outlines LMCH's commitment to providing services in a manner that removes barriers for tenants, visitors, and the public.
- **Communication Standards and Accessible Formats**  
LMCH adheres to the *Information and Communications Standards* under the IASR. We ensure that tenants can access information in formats that meet their needs, including large print, electronic text, plain language, or audio upon request.
- **Accessible Technology**  
LMCH ensures that any self-service technologies procured or developed meet accessibility standards as outlined in the IASR.
- **Tenant Transfer Policy**  
Formalizes LMCH's process for prioritizing unit transfers where a medically documented need for accessible accommodation exists.
- **Tenant Feedback and Complaints Process**  
Ensures that tenants can easily submit complaints or feedback through accessible methods. All concerns are documented, reviewed, and addressed with the goal of improving service and access.

### Accessible Homes



---

LMCH is committed to ensuring that its housing stock will meet and exceed accessibility requirements of the Ontario Building Code in all new builds.

- **Accessibility in Building Improvements**

When planning major repairs or upgrades, we make sure to include accessibility features that support long-term, inclusive housing.

- **Accessibility Changes Requested by Tenants**

Tenants can ask for changes to their units if they have documented accessibility needs. These changes can include grab bars, ramps, wider doorways, and other adjustments to help our tenants live more comfortably and independently.

## Accessible Workplaces

LMCH supports an inclusive and respectful work environment by proactively addressing accessibility and accommodation needs in employment practices. Key policies and processes include:

- **Inclusive Hiring Practices**

LMCH's hiring policy ensures that accommodations are offered throughout the recruitment process, in accordance with the *Ontario Human Rights Code* and the *Employment Standards Act, 2000*.

- **Human Rights, Anti-Harassment & Fair Access Policy**

Reinforces LMCH's zero-tolerance approach to discrimination and harassment. This policy protects the rights of employees with disabilities in all areas of employment and workplace culture.

- **Individualized Emergency Response Information**

Emergency preparedness information is developed for employees with disabilities where required. This is done as soon as practicable after LMCH is informed of an employee's need for accommodation.

- **Workplace Accommodation Policy**

Guides managers and staff in responding effectively to requests for accommodation. It ensures LMCH meets its duty to accommodate and supports employees in maintaining productivity and well-being.

## **SUPPORTS FOR POLICY IMPLEMENTATION:**

To ensure the successful implementation of LMCH's Accessibility Policy, a range of internal supports and mechanisms have been established. These supports are designed to promote awareness, accountability, and continuous improvement across the organization.



## Staff Training

LMCH is committed to ensuring that all staff, volunteers, board members, policy developers, and third-party service providers receive training on accessibility as required under the *Integrated Accessibility Standards Regulation (IASR)*.

### Training includes:

- The requirements of the *Integrated Accessibility Standards Regulation*.
- The relevant provisions of the *Ontario Human Rights Code* as they pertain to people with disabilities.
- LMCH's own policies, procedures, and practices related to accessibility and customer service.

### Training Guidelines:

- Training is role-specific and tailored to the duties of the individual.
- It is delivered as soon as practicable upon hiring or assignment to duties involving accessibility.
- Ongoing training is provided when changes are made to relevant policies and procedures.
- Training is part of LMCH's employee onboarding process.

**Training Records:** LMCH maintains records of training completion, including training dates and the number of individuals trained. These records are subject to internal review to ensure compliance.

## Tenant and Staff Engagement

LMCH recognizes the importance of inclusive policy development and decision-making. Tenants with disabilities, staff members, and external stakeholders will be engaged during the creation and review of accessibility-related policies and plans.

### Consultation may include:

- Tenants with lived experience of disability
- Tenant Councils and tenant advisory committees
- Accessibility-focused organizations and subject matter experts
- LMCH staff and management

This engagement process supports transparency, builds trust, and ensures policies reflect the real needs of the LMCH community.

## Procurement Standards



---

LMCH incorporates accessibility criteria into its procurement practices, ensuring that all goods, services, and facilities acquired meet accessibility requirements wherever practical.

- Accessibility is considered at all stages of the procurement cycle, from planning through to implementation.
- Vendors and contractors must demonstrate compliance with AODA and provide accessible services where legislatively required.
- If it is not practical to include accessibility criteria, documentation will be available upon request outlining the rationale.
- When procuring goods and services for capital improvements or major repairs, LMCH ensures accessibility features are included to support long-term, inclusive housing.
- LMCH also procures materials and services to support accessibility modifications requested by tenants, such as grab bars, ramps, or wider doorways, to help tenants live independently and comfortably.

## COMPLIANCE & MONITORING

LMCH is committed to regular review, monitoring, and reporting to ensure compliance with accessibility legislation and internal policy standards.

### Accessibility Reviews:

- All new or revised policies and procedures are reviewed to ensure alignment with AODA and the *Ontario Human Rights Code*.
- Accessibility reviews are conducted by designated staff or subject matter leads with the goal of identifying and reducing barriers for persons with disabilities.

### Performance Monitoring and Reporting:

LMCH regularly monitors how well it is meeting its accessibility commitments to ensure ongoing compliance with the Accessibility for Ontarians with Disabilities Act (AODA) and related standards.

- LMCH will track the implementation of accessibility-related initiatives, policies, and procedures to evaluate their effectiveness and identify areas for improvement.
- Regular reviews will be conducted to assess compliance with accessibility requirements in procurement, capital projects, tenant accommodations, and service delivery.
- LMCH will document and report on its progress, including the status of accessibility goals and actions taken to remove barriers.
- Feedback from tenants, staff, and community members will be included as part of the performance review process to ensure accessibility measures remain responsive to community needs.



## NOTICE OF DOCUMENT AVAILABILITY

This policy and any related documents are available in accessible formats upon request. Notice of availability is posted at LMCH offices and on the LMCH website.

Previous Approval	• October 27, 2011
Date Revised	• April 24, 2025
Date Approved	• November 2025
To be reviewed	• Every five (5) years
Inquiries to Policy Owner	• Executive Administration / Tenant Services