

ACCESSIBILITY - INTEGRATED ACCESSIBILITY STANDARDS

Key Highlights

- This policy highlights SHS's commitment to providing accessible service to its school community to ensure the working, learning and service environment meets the needs of its members, in relation to information, communication and employment practices
- All activities will align with the Accessibility for Ontarians with Disabilities Act (AODA)
- Training will be provided to employees to ensure awareness of and compliance with the accessibility policies of SHS

Policy Statement

The Sterling Hall School (SHS) is committed to meeting the accessibility needs of people with disabilities in a timely manner. In that regard, SHS has established an accessibility policy to meet its obligations under Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the *Accessibility for Ontarians with Disabilities Act, 2005*.

SHS's vision for accessibility is that people with disabilities, visible or invisible, are given the same opportunity as others to obtain and benefit from services offered by SHS. SHS's goal is to make reasonable efforts to provide services in such a way that the key principles of independence, dignity, integration and equality of opportunity for persons with disabilities are respected.

Purpose

This policy is specifically written to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 under the Accessibility for Ontarians Act, 2005. SHS, through this policy, establishes and implements practices and procedures consistent with its goal of compliance, as well as its commitment to equal opportunity to people of all abilities.

Application

This policy applies to all employees, volunteers and agents of SHS who interact with our school community, including current and prospective students, current, prospective and past parents/grandparents, alumnae, donors and other users of our services.

Training

SHS will ensure that training is provided to all employees, and volunteers, and all persons who participate in developing SHS's policies, on the requirements of the accessibility standards referred to in the Regulation and on the Human Rights Code as it pertains to persons with disabilities. Training will be provided as soon as practicable.

If any changes are made to this policy or the requirements, training will be provided to include those changes. SHS shall maintain a record of the dates when training was provided and the number of individuals to whom it was provided. SHS shall ensure that others that provide goods, services or facilities on behalf of the organization have had training.

Information and Communications Standard

Feedback Processes

SHS will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and with communication supports upon request. SHS will notify the public about the availability of accessible formats and communication supports.

Accessible Formats and Communication Supports

SHS will, upon request, provide or arrange for accessible formats and communication supports for persons with disabilities as follows:

- (i) In a timely manner that takes into account the person's accessibility needs due to a disability;
- (ii) At a cost that is no more than the regular cost charged to other persons;
- (iii) Consult with the person making the request and determine suitability of an accessible format or communication support;
- (iv) Notify the public about the availability of accessible formats and communication supports.

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.

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.

Unconvertible Information or Communications

If SHS determines that information or communications are unconvertible, SHS will provide the person requesting the information or communication with,

- (i) an explanation as to why the information or communications are unconvertible; and
- (ii) a summary of the unconvertible information or communications.

Information or communications are unconvertible if,

- (i) it is not technically feasible to convert the information or communications; or
- (ii) the technology to convert the information or communications is not readily available.

Emergency Information

If SHS prepares emergency procedures, plans or public safety information and makes the information available to the public, SHS shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Educational and Training Resources and Materials

If notification of need is given, SHS will provide educational or training resources or materials in an accessible format that takes into account the accessibility needs of the person with a disability to whom the materials are being provided by:

- (i) Procuring through purchase or obtaining by other means an accessible or conversion ready electronic format, where available, or
- (ii) Arrange for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources or materials cannot be procured.

We shall provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities.

Training to Educators

SHS shall provide educators (those involved in program or course design, delivery and instruction) with accessibility awareness training related to accessible program course delivery and instruction. SHS will keep a record of training, including dates will be provided and the number of individuals to whom it is provided.

Libraries

The libraries of SHS will provide, procure, or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request. Exception from the above requirements will be special collections, archival materials, rare books and donations.

Employment Standard

SHS will comply with the requirements of the Employment Standards in the Regulation. The Employment Standards apply in respect of employees, and not volunteers or other non-paid individuals.

Recruitment

SHS will notify employees and the public about the availability of accommodations for applicants and employees, as the case may be with disabilities as follows:

- (i) In its recruitment processes;
- (ii) During the recruitment process, when job applicants are individually selected to participate in an assessment or selection process;
- (iii) If a selected applicant requests an accommodation, SHS will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability;
- (iv) When making offers of employment to a successful applicant.

Employee Notification

SHS shall inform its employees of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. Such information will be provided as follows:

- (i) To new employees as soon as practicable after they begin their employment;
- (ii) To existing employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

Accessible Formats and Communication Supports

Upon request by an employee with a disability, SHS will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- (i) Information that is needed in order to perform the employee's job; and
- (ii) Information that is generally available to employees in the workplace.

SHS will consult with the employee making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plan (IAP)

SHS will develop and have in place a written process for developing a documented individual accommodation plan for employees with a disability. The process will include the following elements:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how
4. accommodation can be achieved.

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5. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
6. The steps taken to protect the privacy of the employee's personal information.
7. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
8. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
9. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Return to Work

SHS will have in place a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes shall be documented and must outline the steps that SHS will take to facilitate the return to work and include an individual accommodation plan.

Performance Management, Career Development and Advancement and Redeployment

SHS will take into account the accommodation needs and/or individual accommodation plans of employees when:

- (i) Using performance management processes;
- (ii) Providing career development and advancement information;
- (iii) Using redeployment procedures (if any exist at the School).

Workplace Emergency Response Information

SHS shall provide individualized workplace emergency response information to employees who have a disability in accordance with the following elements:

- (i) If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability;
- (ii) If the employee who receives an individual workplace emergency response information requires assistance and with the employee's consent, SHS shall provide the workplace emergency information to the person designated by SHS to provide assistance to the employee;
- (iii) As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;
- (iv) Review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when SHS reviews its general emergency response policies.

Questions About this Policy

If anyone has questions about the SHS's accessibility policy and/or accessibility plan, or requires this information in an accessible format, please contact the Director of Finance.