

ACCESSIBILITY POLICY

INTEGRATED ACCESSIBILITY STANDARDS

UPDATED MARCH 2025

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 its customer service practices.
- All activities will align with the Accessibility for Ontarians with Disabilities Act (AODA).
- SHS will provide alternate means of communication (upon request), allowance for service animals and support persons, and assistive devices in its customer service delivery.
- 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 creating and maintaining an environment that is accessible for all students, employees and community members. SHS welcomes and encourages all members of our community to collaborate and provide creative input in future initiatives for accessibility.

SHS is also committed to providing excellent customer service in a manner that, as much as reasonably possible, respects an individual's dignity and independence for persons with disabilities. In its ongoing efforts to strive for accessibility, SHS is committed to the principles and goals of the *Accessibility for Ontarians with Disabilities Act, 2005* and the Regulations supporting this Act.

PURPOSE

This policy aims to ensure that people with disabilities, visible or invisible, are given the same opportunity as others to obtain, use and benefit from the services offered by SHS. It is specifically written to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians Act, 2005*, and applies to the provision of products and services to the public or other third parties, not to the products themselves. SHS, through this policy, establishes and implements practices and procedures consistent with its goal of compliance, as well as its commitment to excellent customer service for all.

SHS is committed to providing services that are free of barriers and biases to students, parents/guardians, the public and staff. SHS strives to ensure that key principles of independence, dignity, integration, equality of opportunity and diversity are reflected and valued in the learning and work environments. SHS will continue to provide an environment in

all of its facilities that builds independence, dignity and respect for students, parents/guardians, the public and staff, and improve accessibility to persons with disabilities in its facilities, its policies and processes.

CUSTOMER SERVICE & COMMUNICATION GUIDELINES

1. SHS operates in a manner that respects the dignity and independence of persons with disabilities.
2. The provision of services to persons with disabilities and others must be integrated, unless an alternate measure is necessary, to enable a person with a disability to obtain, use or benefit from the school services.
3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the school services.
4. Reasonable efforts will be made to ensure that services provided by SHS are provided in a way that allows a person with a disability to maintain self-respect and the respect of others while allowing them to do things on their own without unnecessary help or interference from others, as long as this does not present a safety risk.

DEFINITIONS

The following definitions are used in describing the procedure in providing services to members of the community.

Accommodation: is a means through reasonable efforts, of preventing and removing barriers that impede individuals with disabilities from participating fully in the services of the school.

Assistive device: is any device used by people with disabilities to help with daily living. Assistive devices include a range of products such as wheelchairs, walkers, white canes, oxygen tanks and electronic communication devices.

Barriers to accessibility: mean anything that prevents a person with a disability from fully participating in all aspects of the services of the school. Examples include a physical barrier, an architectural barrier, information or communication barrier, an attitudinal barrier and a technological barrier.

Customer: Any person who uses the goods and services of SHS, including students, parents and other members of the school community.

Disability: As defined in the *Accessibility for Ontarians with Disabilities Act, 2005*, section 2, means (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness; (b) a condition of mental impairment or developmental disability; (c) a learning disability or a dysfunction on 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 *Workplace Safety and Insurance Act, 1997*.

Disruption of service: is any disruption to a physical service such as repairs, maintenance, replacement or removal that will require a person with a disability to seek alternate means to access a facility.

Service animal: is an animal that is being used because of a person's disability and this is either readily apparent or is supported by a letter from a medical practitioner.

Support person: is a person who assists or interprets for a person with a disability as they access the services of the school. A support person is distinct from an employee who supports a student in the system. Personal care needs may include, but are not limited to, physically transferring an individual from one location to another or assisting an individual with eating or using the washroom. Medical needs may include, but are not limited to, monitoring an individual's health or providing medical support by being available in the event of a seizure.

SCHOOL EXPECTATIONS

SHS will make all reasonable efforts to ensure that all policies, practice and procedure are consistent with the principles of independence, dignity, integration and equality of opportunity to all with particular attention for persons with disabilities.

SHS will welcome all members of the school to its facilities by committing to providing services to incorporate measures that include, but are not limited to, the use of assistive devices and service animals.

To ensure greater awareness and responsiveness to the needs of a person with disabilities, SHS will provide appropriate training for all Faculty & Staff who deal with the public or other third parties on behalf of the school. Training will be provided to all Faculty & Staff and, when appropriate, to volunteers. As new Faculty & Staff are hired, the training will become a component of their orientation training and will be provided within a reasonable timeframe.

SHS will ensure that its policies and procedures related to the *Accessibility for Ontarians with Disabilities Act, 2005* are made available to the public and will also ensure there is a capacity to provide communication about these policies and procedures in a format that takes into account a person's disability.

When services that are normally provided to a person with a disability are temporarily unavailable, a disruption of service notice will be posted at the site and on SHS's website.

In order to monitor the effectiveness of implementation of the *Accessible Customer Service Standard*, SHS will develop a process for receiving and responding to feedback. Information about the feedback process will be readily available to the public and will allow people to provide feedback using a number of methods.

ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

SHS will communicate to people with disabilities in ways that take into account their disability. We will train our employees and volunteers on how to interact and communicate with our diverse community and people with diverse disabilities.

Upon request, SHS will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability. SHS will consult with the person making the request in determining the suitability of an accessible format or communication support.

Billing

SHS is committed to providing accessible invoices to our customers. For this reason, invoices will be provided in alternative formats, upon request.

Telephone Services

SHS is committed to providing fully accessible telephone service to all customers. We will train our employees and volunteers to communicate over the telephone in plain language and to speak clearly.

Websites and Web Content

SHS uses the *Web Content Accessibility Guidelines (WCAG) 2.0* for our website and website content. These guidelines explain how to make web content more accessible for people with disabilities, and user friendly for everyone. We've chosen Level AA as the target for our website.

ASSISTIVE DEVICES

SHS is committed to service people with diverse disabilities who use assistive devices to obtain, use or benefit from our services. We will ensure that our employees and volunteers are aware and trained in the use of the various assistive devices provided by SHS, for customers with disabilities while accessing our services. SHS will provide assistance to any of the alumni/student/parent community requiring the use of assistive devices.

USE OF SERVICE ANIMALS

If a person with a disability is accompanied by a guide dog or other service animal, SHS will ensure that the person is permitted to enter school premises and to keep the animal with them, unless the animal is otherwise excluded by law from the premises. If the animal cannot be easily identified as a service animal, the person will be asked to provide documentation from a regulated health professional. The documentation must confirm that the person needs the service animal for reasons related to their disability. While visiting SHS, it is the responsibility of the person with a service animal to control the animal at all times. If a service animal is excluded by law from school premises, SHS will ensure that other measures are available to enable the person with a disability to obtain, use or benefit from SHS's services. Examples include: the *Health Protection and Promotion Act* and the *Food Safety and Quality Act*. The

former Act prohibits service animals in places where food is prepared, processed, or handled (e.g. the McCain Dining Hall kitchen). Service dogs are permitted where food is served (e.g. McCain Dining Hall).

In the event an employee or student is allergic to a service animal, alternative arrangements will be negotiated.

USE OF A SUPPORT PERSON

If a person with a disability is accompanied by a support person, SHS will ensure that both persons are permitted to enter the school premises together (access will be in accordance with normal security procedures) and that the person with a disability is not prevented from having access to the support person while on the premises. SHS may require a person with a disability to be accompanied by a support person while on school premises, in situations where it is necessary to protect the health and safety of the person with a disability, or the health and safety of others on the school premises. Before making a decision, SHS will consult with the person with a disability to understand their needs, consider health and safety reasons based on available evidence, and determine if there is no other reasonable way to protect the health or safety of the person or others on the premises. Consent from the person with a disability is required when communicating private issues related to the person with a disability, in the presence of a support person.

For those school events where admission fees apply, these fees will be waived for support persons. SHS will ensure that notice is given in advance of relevant events or activities that admission fees will be waived for support persons.

NOTICE OF TEMPORARY DISRUPTION

SHS will make reasonable effort to provide customers with notice in the event of a disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, that are available. We will not be able to give adequate notice in case of an emergency (such as a major storm or power outage, that disrupts all of SHS's services) temporary disruption. In order to make information accessible, the signs and printed notices of sufficient size that are easily readable will be prepared.

The signs and printed notices will be displayed prominently at the entrance to the school, on notice-boards and at service desks. Other options that may be used include posting on SHS's website or through direct communication (i.e. telephone, email or face-to-face communication). Telephone messages will be left in clear and concise language.

TRAINING FOR EMPLOYEES

SHS will ensure that all persons to whom this policy applies receive training as required by the *Accessibility Standards for Customer Service Regulation* and continue to provide training on the Human Rights Code as it pertains to persons with disabilities. Training will be provided to

SHS employees as part of orientation training and once a year during August Professional Development (PD). Training will be provided to each person as soon as practicable after they are assigned to relevant duties. Training will also be provided on an ongoing basis in connection with changes to the policies and procedures governing the provision of goods and services to persons with disabilities.

The training will be appropriate to the duties of the employees, volunteers and other persons. A record of training received by employees and volunteers will be kept in the School's Human Resources department.

Training for SHS employees will focus on the following areas:

- The purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- The requirements of the *Accessibility Standards for Customer Service (Ontario Regulation 429/07)*.
- Information about SHS's policies, procedures, and guidelines pertaining to the provision of services to users with disabilities.
- How to interact and communicate with people with various types of disabilities.
- How to interact with people with disabilities who use assistive devices or require the assistance of a service animal or a support person.
- How to use equipment or devices available on school premises or otherwise provided by the school that may help with the provision of services to a person with a disability.
- What to do if a person with a particular type of disability is having difficulty accessing the school's services.

EMPLOYMENT STANDARDS

Recruitment, Assessment or Selection Process

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.

Notice to Successful Applicants

When making offers of employment, SHS will notify the successful applicant of its policies for accommodating employees with disabilities to applicants requesting accessibility.

Informing Employees of Supports

SHS will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon the request of 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 information that is needed to perform their job, and information that is generally available to other employees.

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.

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.

Workplace Emergency Response Information

SHS will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if SHS is aware of the need for accommodation due to the employee's disability. SHS will provide this information as soon as practicable after becoming aware of the need for accommodation. Where the employee requires assistance, SHS will, with the consent of the employee, provide the workplace emergency response information to the person designated by SHS to provide assistance to the employee.

SHS will review the individualized workplace emergency response information when the employee moves to a different location in the building, when the employee's overall accommodations, needs or plans are reviewed.

The process will include 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.

Documented Individual Accommodation Plans

SHS will maintain a written process for the development of documented individual accommodation plans for employees with disabilities. If requested, information regarding accessible formats and communication supports provided will also be included in individual accommodation plans. In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

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.
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 Process

SHS maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. The return-to-work process outlines the steps SHS will take to facilitate the return to work and will include documented individual accommodation plans as part of the process. This return-to-work process will not replace or override any other return-to-work process created by or under any other statute (i.e., the *Workplace Safety Insurance Act, 1997*).

Performance Management, Career Development and Advancement, and Redeployment

SHS will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

TRANSPORTATION

SHS will consider the impact on persons (students, faculty, and staff) with disabilities when booking transportation for school trips, related events, and student transportation services to and from school (“The Fun Bus”). SHS will ensure that integrated accessible school transportation services are provided for students, and that appropriate alternative accessible transportation services are provided for students with disabilities, except where not practicable to do so. In consultation with parents or guardians of students with disabilities, SHS will develop individual school transportation plans and communicate to the appropriate parties the roles and responsibilities of the transportation provider, the parents or guardians of the student with the disability, the operator of the vehicle used to transport the student, appropriate school faculty & staff and the student with the disability.

DESIGN OF PUBLIC SPACES

SHS will consider the impact on persons with disabilities when purchasing new equipment, designing new systems or planning a new initiative. SHS will also establish a process for consulting with the front-line staff and volunteers who have a role in implementing the expectations and procedures established under this policy to review its effectiveness.

ACCESSIBILITY PLAN

SHS will develop, maintain and document an Accessibility Plan (multi-year) outlining the school’s strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities. The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the SHS’s website. Upon request, SHS will provide a copy of the Accessibility Plan in an accessible format.

CONFIDENTIALITY

All of SHS’s confidentiality policies apply to this policy.

FEEDBACK PROCESS

SHS welcomes feedback, including feedback about the delivery of services to persons with disabilities. Any concerns or complaints regarding accessibility for persons with disabilities



should be placed directly with the Vice-Principal of Operations or the Director of Finance. In the event that a complaint is made, SHS will review the complaint with relevant personnel and school administration and provide a response within 10 business days. Methods could include email, verbal input or written letter.

QUESTIONS ABOUT THIS POLICY

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by:

Rob Buwalda

Director of Finance

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