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## **ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005 INTEGRATED ACCESSIBILITY STANDARDS | MULTI YEAR PLAN**

### **Intent**

This accessibility plan outlines the strategy of The Sterling Hall School to prevent and remove barriers for people with disabilities and comply with the requirements of the *Integrated Accessibility Standards Regulation under the Accessibility for Ontarians with Disabilities Act, 2005*.

### **Statement of Commitment**

The Sterling Hall School is committed to providing an accessible environment for all clients, employees, job applicants, suppliers and visitors who may enter our premises, access our information or use our services. As an organization, we respect and comply with the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005*, and its associated regulations. We strive to provide an accessible and welcoming environment for everyone by identifying and removing barriers in our workplace and ensuring that new barriers are not created. We are committed to ensuring that persons with disabilities are provided with equal opportunities, and we strive to meet the needs of individuals with disabilities in a timely and integrative manner that respects their dignity and independence.

### **Multi-year Accessibility Plan**

This plan is in effect from (March 31, 2025) to (March 31, 2030), with a review scheduled annually, and an update scheduled for February 2030. If you have any questions or concerns about this plan or its initiatives, or if you want to receive a copy of the plan in a different accessible format, please contact Rob Buwalda, Director of Finance, at [rbuwalda@sterlinghall.com](mailto:rbuwalda@sterlinghall.com).

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**PART I | GENERAL REQUIREMENTS**

SECTION	INITIATIVE	DESCRIPTION	ACTION	STATUS	COMPLIANCE DATE
3	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	<p>Develop an Accessibility Policy.</p> <p>Approval from Senior Leadership and post related policies with access links in our Faculty Portal, related handbooks, and on our website.</p> <p>Senior Leadership reviews the Accessibility Policy annually.</p>	<p>Completed</p> <p>Completed</p> <p>Ongoing</p>	<p>May 2017; Updated on March 2025</p> <p>March 2025</p> <p>Most recent review: March 2025</p>
4	Accessibility Plans	4.(1) Large organizations shall,  a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this	a) Establish and maintain a Multi-Year Plan.	Completed	March 2025

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		<p>Regulation;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>	<p>b) Post the Multi-Year Plan on the school's website and note that an accessible format is available upon request.</p> <p>c) Ensure that the Multi-Year Plan is reviewed annually by the Director of Finance (and school's Senior Leadership team).</p>	<p>Completed</p> <p>Completed / Ongoing</p>	<p>March 2025</p> <p>Most recent review: March 2025.</p> <p>Next review scheduled: March 2026</p> <p>Next update scheduled: March 2030</p>
6	Self-Serve Kiosks	6.(2) Large organizations and small organizations shall have regard for the accessibility of persons with disabilities when designing, procuring or acquiring self-service kiosks.	N/A	N/A	N/A
7	Training	7.(1) Every obligated organization	Establish a process to have all	Completed	March 2025

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		<p>shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<p>employees and volunteers (as needed) complete mandatory accessibility training.</p> <p>Monitor training completion and keep records to ensure compliance with AODA standards (Vice-Principal &amp; Director of Finance).</p>	Ongoing	Annual during August PD, and when required for mid-year hires.
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**PART II | INFORMATION AND COMMUNICATION STANDARDS**

SECTION	INITIATIVE	DESCRIPTION	ACTION	STATUS	COMPLIANCE DATE
11	Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with	Ensure that all feedback mechanisms, including online forms, email, and in-person communication, are accessible to persons with disabilities by	Completed / Ongoing	March 2025

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		<p>disabilities by providing or arranging for accessible formats and communications supports, upon request.</p>	<p>offering accessible formats and communication supports, such as large print and assistive technology, upon request.</p> <p>Determine what accessible formats and communication supports we will provide upon request.</p> <p>(Examples of accessible formats include and are not limited to: materials in large-case fonts, high-contrast copy, phone communication instead of email (for example, surveys, questionnaires, donations, parent communication), text transcripts of audio and video information, augmentative and alternative communication methods, sign language interpretation and other types of translation, captioning and audio description.)</p>		
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			Staff and management are aware of the need to accommodate upon request (part of training).	Completed / Ongoing	Annual during August PD, and when required for mid-year hires.
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons.	Provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request, in a timely manner that considers the individual's accessibility needs. Ensure that any costs associated with these formats or supports do not exceed the regular cost charged to other individuals.  Communicate to staff and management that no additional charge is required (part of training).	Completed  Completed / Ongoing	May 2017; Updated on March 2025  Annual during August PD, and when required for mid-year hires.
		12.(2) The obligated organization	Communicated to staff and	Completed /	Annual during

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		<p>shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>	<p>management of this requirement (in training).</p> <p>Establish processes for employees to make requests for accessible formats or communication supports through their supervisor and/or the Director of Finance. For public requests, provide contact options on the school's website, ensuring that the appropriate staff member consults with the individual to determine the most suitable accessible format or communication support.</p> <p>Situation when accommodations cannot be made:</p> <ul style="list-style-type: none"> <li>- It is not possible technically to convert a document to an</li> </ul>	<p>Ongoing</p> <p>Completed</p>	<p>August PD, and when required for mid-year hires.</p> <p>March 2025</p>
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			<p>accessible format (in this instance, SHS will explain why and provide a short summary of it instead)</p> <ul style="list-style-type: none"> <li>- SHS does not control the information</li> <li>- The information is found on products or product labels (i.e. labels at the Shark Shop).</li> </ul> <p>We will provide this in an accessible format upon request.</p>		
		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Post, on the school's website, notification of the availability of accessible formats and communication supports.	Completed	May 2017; Updated on March 2025
13	Emergency Procedures, Plans or Public Safety Info	13.(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the	Details of this are included in our Fire Safety Plan and Fire and Evacuation Procedures with details of procedures for Personal Evacuation Plan for	Completed	March 2025

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		<p>information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.</p>	<p>People With Disabilities to help people: with low vision or blindness, who are deaf or hard of hearing, using crutches, canes, walkers or wheelchairs.</p> <p>Student Medical Support Plan: <a href="#">A</a> and <a href="#">B</a>.</p> <p>Part of “<a href="#">The Sterling Hall School Individual Accommodation Plan Process</a>” documentation includes Emergency Preparedness, which allows individuals to identify barriers that can arise in an emergency.</p>		
14	Accessible Websites & Web Content	<p>14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall</p>	<p>Work with our website provider, Finalsight, to ensure that our website and all content conforms with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level AA.</p>	Completed	May 2017

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		do so in accordance with the schedule set out in this section.			
15	Educational & Training Resources & Materials	<p>15.(1) Every obligated organization that is an educational or training institution shall do the following, if notification of need is given:</p> <p>1. Provide educational or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person with a disability to whom the material is to be provided by,</p> <p>i. procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or</p> <p>ii. arranging for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or</p>	<p>1. Source accessible educational materials and various assistive technologies to ensure educational materials are accessible for individual needs.</p> <p>Student Medical Support Plan: <a href="#">A</a> and <a href="#">B</a>.</p>	Completed/ongoing	Upon Request

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		<p>training resources or materials cannot be procured, obtained by other means or converted into an accessible format.</p> <p>2. Provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities.</p>	<p>2. Provide student records and program information, including requirements, availability, and descriptions, in an accessible format upon request to meet the needs of persons with disabilities.</p> <p>Develop an individual education plan (IEP), based on individual needs and communicate needs to faculty through a student's SSP (Student Success Plan), managed by Student Success. SSPs are housed both electronically and in a student Ontario School Record and updated every year to reflect individual needs.</p>	Completed/ ongoing	Upon Request
16	Training to	16.(1) In addition to the	Provide training to all staff at	Completed/	August 2024 /

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	Educators	requirements under section 7, obligated organizations that are school boards or educational or training institutions shall provide educators with accessibility awareness training related to accessible program or course delivery and instruction.	opening meetings each August PD.  Provide online training to all new hires as part of their onboarding.	ongoing  Ongoing	Next in: August 2025  As needed.
		(2) Obligated organizations that are school boards or educational or training institutions shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.	Vice-Principal of Operations and Director of Finance maintain records of all accessibility training, including the dates of completion and the number of individuals trained, to ensure compliance with AODA standards.	Completed / on-going	Up to date as of March 2025
17	Producers of Educational or Training Material	17(1) Every obligated organization that is a producer of educational or training textbooks for educational or training institutions shall upon request, make accessible or conversion ready versions of the textbooks available to the institutions.	We ensure that all educational resources (curriculum documents) produced (teacher-created) in house at SHS are accessible through our assistive technologies; available upon request.	Completed / on-going	Upon Request

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		(2) Every obligated organization that is a producer of print-based educational or training supplementary learning resources for educational or training institutions shall upon request, make accessible or conversion ready versions of the printed materials available to the institutions.	N/A	N/A	N/A
18	Libraries of educational & training institutions	<p>18(1) Subject to subsection (2) and where available, the libraries of educational and training institutions that are obligated organizations shall 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.</p> <p>(2) Special collections, archival materials, rare books and donations are exempt from the requirements of subsection (1).</p>	<p>Ensure that the school's Learning Commons provides accessible or conversion-ready formats of print, digital, or multimedia resources upon request. Utilize text-to-voice technology to support the accessibility needs of individuals with disabilities.</p> <p>Special collections and archival materials typically exempt as described by this policy, are readily identifiable.</p>	Completed/ Ongoing	March 2025; confirmed with Teacher Librarian that this is in place.

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**PART III | EMPLOYMENT STANDARD**

SECTION	INITIATIVE	DESCRIPTION	ACTION	STATUS	COMPLIANCE DATE
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Ensure that all job postings notify employees and the public about the availability of accommodation for applicants with disabilities during the recruitment process.	Ongoing /Incomplete	June 2025
23	Recruitment, Assessment or Selection Process	<p>23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>(2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a</p>	<p>Notify all selected job applicants that accommodations are available upon request during the selection process. Upon receiving a request, consult with the applicant to provide suitable accommodations that address their accessibility needs.</p> <p>Identify barriers: location of interview room, format of tests, room set-up for in-person interviews, interviewing timelines, supports, and</p>	Ongoing /Incomplete	June 2025

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		manner that takes into account the applicant's accessibility needs due to disability.	paperwork.  Develop interview guidelines and use Google Meets/Zoom with 'captions on' if needed.		
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	<p>The purpose of the <b>Accessible Customer Service Policy</b> is to provide a framework through which SHS can achieve excellent service for people with disabilities. Read our AODA Policy <a href="#">HERE</a>.</p> <p>The purpose of the <b>Integrated Accessibility Standards Policy</b> is to provide standards that have been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information, communication and employment. Read our IAS Policy <a href="#">HERE</a>.</p> <p>The following statement is put</p>	Completed / Ongoing	March 2025

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			<p>in each posting: “The Sterling Hall School is committed to fostering an inclusive, equitable and accessible environment. We encourage applications from all qualified candidates with a diverse range of experiences and perspectives who may contribute to The Sterling Hall School’s organizational diversity and who share the school’s values.</p> <p>We thank all candidates for their applications; however, only those selected for an interview will be contacted. Upon request, accommodations are available for applicants with disabilities throughout our recruitment process. A satisfactory vulnerable sector screening and background check is a condition of employment.”</p>		
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			Notify all successful applicants of the school's policies for accommodating employees with disabilities by providing them with the Faculty & Staff handbook, which includes detailed information on accommodation policies alongside other important procedures.		
25	Informing Employees of Supports	25.(1) Every employer 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 disability.	Inform all employees (through the Faculty & Staff Handbook, Internal Notice Boards, Faculty Portal, and website) of the school's policies for supporting employees with disabilities, including job accommodations that address accessibility needs.	Completed	March 2025
		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	AODA related training delivered through our HR downloads platform where all existing and new employees gets the following training: - AODA Customer Service	Completed	March 2025

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			<p>Training</p> <ul style="list-style-type: none"> <li>- Understanding Human Rights (AODA edition) Training</li> </ul> <p>In-person training (during August PD, or when an employee is hired mid-year) includes an overview of SHS-specific Customer Service and building-specific scenarios.</p> <p>Provide new employees with the Faculty &amp; Staff handbook immediately upon starting their employment and require them to sign off, confirming that they have read and understood the document, including the policies for supporting employees with disabilities. (Vice-Principal &amp; Director of Finance do response tracking.)</p>	Completed / Ongoing	Next Professional Development (PD) is: August 2025.
		25.(3) Employers shall provide updated information to its employees whenever there is a	Provide updates to all Faculty & Staff on any changes to policies regarding job	Completed / ongoing	March 2025

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		change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	accommodations for employees with disabilities during one of the PD days.		
26	Accessible Formats & Communication Supports for Employees	26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication 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.	We have an <a href="#">Individual Accommodation Plan Process</a> developed that covers this. Otherwise, consult with employees with disabilities, upon request, to provide or arrange for accessible formats and communication supports for job-related information and any general information available to all employees in the workplace.	Completed / ongoing	March 2025
		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	We have an <a href="#">Individual Accommodation Plan Process</a> developed that covers this. Otherwise, consult with employees with disabilities, upon request, to provide or	Completed / ongoing	March 2025

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			arrange for accessible formats and communication supports for job-related information and any general information available to all employees in the workplace.		
27	Workplace Emergency Response Information	27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, 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.	<p>The <a href="#">Individual Accommodation Plan Process</a> developed for accommodation can be found linked in the Faculty &amp; Staff Handbook and through the Faculty Portal.</p> <p>Develop training for all employees covering Personal Evacuation Plans for People With Disabilities.</p> <p>Provide individualized <a href="#">workplace emergency response</a> information to employees with disabilities, as needed, ensuring that the emergency response plan addresses the specific needs of the employee's disability</p>	<p>Completed</p> <p>Completed</p> <p>Completed / ongoing</p>	<p>March 2025</p> <p>March 2025</p> <p>March 2025</p>

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		(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	With the employee's consent, provide the <a href="#">individualized workplace emergency response</a> information to the designated person responsible for assisting the employee during an emergency.	Completed / ongoing	March 2025
		(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	Provide <a href="#">individualized workplace emergency response</a> information as soon as practicable after becoming aware of an employee's need for accommodation due to their disability.	Completed / ongoing	March 2025
		(4) Every employer shall review the individualized workplace emergency response information,  (a) when the employee moves to a different location in the organization;	Review the <a href="#">individualized workplace emergency response</a> information when the employee moves to a new location, when their accommodation needs or plans are updated, and during the review of the school's general	Completed / ongoing	March 2025

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		<p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<p>emergency response policies.</p>		
28	<p>Documented Individual Accommodation Plans</p>	<p>28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p>	<p>The <a href="#">Individual Accommodation Plan Process</a> can be found in our Faculty &amp; Staff Handbook and Faculty Portal, which includes a section for the development of documented individual accommodation plans for employees with disabilities. The plan follows the following four steps:</p> <ol style="list-style-type: none"> <li>1. Recognize the Need for Accommodation</li> <li>2. Gather Relevant Information and Assess Needs</li> <li>3. Write a Formal, Individual Accommodation Plan</li> </ol>	<p>Completed</p>	<p>March 2025</p>

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			4. Implement, Monitor and Review		
		<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"><li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li><li>2. The means by which the employee is assessed on an individual basis.</li><li>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.</li></ol>	<p>The <a href="#">Individual Accommodation Plan Process</a> can be found in our Faculty &amp; Staff Handbook and Faculty Portal takes into account the requirements under 28 (2).</p>	Completed	March 2025

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		<p>4. 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.</p> <p>5. The steps taken to protect the privacy of the employee's personal.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the</p>			
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		individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.			
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p>	<p>The SHS Return to Work Process and Plan can be found <a href="#">HERE</a>. 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 <a href="#">Individual Accommodation Plans</a> as part of the process.</p>	Completed / ongoing	March 2025
		<p>29. (2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to</p>	See above.	Completed/ ongoing	March 2025

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		work of employees who were absent because their disability required them to be away from work; and (b) use individual documented accommodation plans, as described in section 28, as part of the process.			
		29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.	See above.	Completed/ ongoing	March 2025
30	Performance Management	30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	Ensure that the accessibility needs and <a href="#">Individual Accommodation Plans</a> of Faculty & Staff with disabilities are taken into account during the performance management process.	Completed / ongoing	March 2025
31	Career Development & Advancement	31.(1) An employer that provides career development and advancement to its employees shall	Take into account the accessibility needs and <a href="#">Individual Accommodation</a>	Completed / ongoing	March 2025

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		take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	<a href="#">Plans</a> of Faculty & Staff with disabilities when providing career development and advancement opportunities.		
32	Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	Take into account the accessibility needs and <a href="#">Individual Accommodation Plans</a> of Faculty & Staff with disabilities when providing career development and advancement opportunities.	Completed / ongoing	March 2025

Reviewed: March 2025.

Next Review: February 2026.