



*The Northwest Catholic  
District School Board*

## The Northwest Catholic District School Board

Section	Number	
G	2	7

### **ADMINISTRATIVE PROCEDURES**

#### **Title: Accessibility Standards for Customer Service**

#### **Preamble:**

Under the Accessibility for Ontarians with Disabilities Act, 2005, all School Boards must meet the requirements of accessibility standards established by the regulation. This Administrative Procedure establishes the accessibility standards for customer service for The Northwest Catholic District School Board, in accordance with Ontario Regulation 429/07. This Administrative Procedure applies to all employees of the Northwest Catholic District School Board, agents, volunteers and contracted staff and third party contractors.

#### **Procedures:**

The Northwest Catholic District School Board is committed to providing services that are free of barriers and biases to our students, parents/guardians, the public and our staff. The Northwest Catholic District School Board strives to ensure that key principles of independence, dignity, integration and equality of opportunity are reflected and valued in our learning and working environments. Our conduct will demonstrate our belief in the strength diversity brings to our communities. We are committed to giving people with disabilities the same opportunity of access to our services in the same location and in a similar way as these services are available to all others we serve.

#### **Definitions:**

**Disability:** Is any degree of physical 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 impediment, muteness or speech impediment, physical reliance on a guide dog or other animal or a wheelchair or other remedial appliance or device, a condition of mental impairment or developmental disability, a learning disability or dysfunction in one or more processes involved in understanding or using symbols or spoken language, an injury or disability for which benefits were claimed under WSIB.

**Customer:** Is any person who uses the services of the school board.

**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 or electronic communication devices.

**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 Board. A support person is distinct from an employee who supports a student in the system.

**Third Party Contractors:** Is any person or organization acting on behalf of or as an agent of the Board (e.g. bus operators, psychologists).

**Barriers to Accessibility:** Means anything that prevents a person with a disability from fully participating in all aspects of the services of the Board. This includes, but is not limited to, a physical barrier, an architectural barrier, an information or communication barrier, an attitudinal barrier, or a technological barrier.

**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 Board.

### **Board Responsibilities:**

1. The Board will make all reasonable efforts to ensure that all policies, practices and procedures, from the date of this policy forward, are consistent with the principles of independence, dignity, integration and equality of opportunity to all with particular attention for persons with disabilities.
2. The Board will welcome all members of the school and broader community to our facilities by committing our staff and volunteers to providing services that respect the independence and dignity of persons with disabilities. This service will incorporate measures that include but are not limited to the use of assistive devices and service animals.
3. To ensure greater awareness and responsiveness to the needs of a person with disabilities, the Board will provide appropriate training for all staff who deal with the public or other third parties on behalf of the Board.
4. Training as identified in No. 3 will be provided to all staff and, when appropriate, to volunteers. As new staff are hired, the training will become a component of their orientation training and will be provided within a reasonable timeframe.
5. The Board will ensure that its policies and procedures related to the Accessibility for Ontarians with Disabilities Act, 2005 are made available to the public. Also, the Board will ensure there is capacity to provide communication about these policies and procedures in a format that takes into account a person's disability.
6. When services that are normally provided to a person with a disability are temporarily unavailable, such as access to an elevator or an accessible door to a building, a disruption of service notice will be posted at the site and on the Board's website.
7. In order to monitor the effectiveness of implementation of the Accessible Customer Service Standard, the Board 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.

8. So that adherence to this policy can be achieved efficiently and effectively, the Board and all its managers and school-based administrators will take into account the impact on persons with disabilities when purchasing new equipment, designing new systems or planning a new initiative.
9. The Board will create a feedback process that will review the implementation of this policy with the Board's various constituency groups. Examples of constituency groups include Special Education Advisory Council (SEAC), Federations, unions, citizens' groups. An example of a method would include use of electronic means such as websites.
10. The Board will also establish a process for consulting with frontline staff and volunteers who have a role in implementing the expectations and procedures established under this policy to review its effectiveness.

## **1.0 Monitoring and Feedback on Accessible Customer Service**

The Board will monitor the effectiveness of the implementation of the Accessible Customer Service Standard through a process for receiving and responding to feedback. Information about the feedback process will be readily available to the public and will allow people with disabilities to provide feedback using a number of methods. The Board will create a feedback process that will review the implementation of this policy with the Board's various constituency groups such as the Special Education Advisory Committee (SEAC), OECTA, or CUPE. Methods would include electronic means such as websites. (Note: Consultation relates to membership of these groups as providers of Accessible Customer Service.)

### **1.1 Responsibility:**

The Director of Education and/or designates will implement a process for feedback on Accessible Customer Service that has the following components:

- Information on the Board website will invite users of Board services to provide feedback on their experience with or concerns about access to services for people with disabilities.
- Printed information will be available through School and Board Offices to invite people with disabilities to provide feedback on their experience with or concerns about accessibility of services. Consideration will be given to providing information in alternate formats.
- Information on how the Board will respond to feedback.

The Director of Education and/or designates will create a process for reviewing the implementation of the policy on "Accessibility Standards for Customer Service" that includes consultation with various constituency groups including Special Education Advisory Committee (SEAC), Federations, unions and citizens' groups.

## **1.2 Methods for Feedback:**

The Board has a feedback process through which people with disabilities are encouraged to provide information and feedback about services they receive.

- A range of methods for soliciting feedback will be employed to ensure optimum access to the feedback process by people with disabilities including e-mail, mail, telephone or fax.
- Feedback can be sent to the Human Resources Department.
- The feedback process is promoted on the Board's website, and a copy of the feedback form is available upon request.

### **Sample Notice Feedback:**

The Northwest Catholic District School Board is committed to ensuring that its services meet optimum standards of accessibility for people with disabilities using the facilities and services of the Board. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way The Northwest Catholic District School Board provides services to people with disabilities can be made by e-mail, verbally or a feedback card.

All feedback will be directed to the Human Resources Administrator, who will respond either by direct response, by email or a summary report on the website.

## **2.0 Notification of Disruption of Service**

When services that are normally provided to a person with a disability are temporarily unavailable, such as access to a power assist door or an elevator, a disruption of service notice will be posted at the site and on the Board's website.

### **2.1 Definition/Explanation of Disruption of Service:**

As members of the general public, people with disabilities may rely on certain facilities, services or systems in order to access the services of the school or board offices. Power assist doors and elevators, for example, are important to people with mobility disabilities because that may be the only way they can access the premises. Other systems and services designed to meet the needs of people with disabilities can include accessible washrooms, accessible parking, amplification systems, and note-taking or TTY services. When those facilities or services are temporarily unavailable, or if they are expected to be temporarily unavailable in the near future, a notice of disruption of service is required.

Generally, disruptions to all of the Board's services such as during a major storm or power outage do not require this special notice. However, if the disruption has a significant impact on people with disabilities, a notice of the disruption will be provided.

### **2.2 Responsibility:**

Supervisory Officers, Principals, Departmental Managers or designates will ensure that

the users of board and school services are notified when there is a disruption in services that may have an impact on access to services by people with disabilities.

- Notice will be given by posting the information at a conspicuous place at or in the school or at or in board facilities and/or posting the notice on the board website or through direct communication with users of the services in accordance with school practices.
- Consideration will be given to providing notice in multiple formats.

### **Sample Notice of Disruption in Service**

There is currently an unexpected service disruption. The estimated time of the service disruption will be From: \_\_\_\_\_ To: \_\_\_\_\_. The disruption includes: \_\_\_\_\_. The following alternative services are available: \_\_\_\_\_. On behalf of the Northwest Catholic District School Board we would like to thank you for your patience in this matter. Contact: \_\_\_\_\_.

## **3.0 Use of Assistive Devices by the General Public**

The Board will welcome all members of the school and broader community to our facilities by committing our staff and volunteers to providing services that respect the independence and dignity of people with disabilities. Such services incorporate measures that include, but are not limited to, the use of assistive devices.

### **3.1 Definition/Explanation of Assistive Devices:**

An 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.

### **3.2 Responsibility:**

Supervisory Officers, Principals and Departmental Managers will ensure that staff are trained to support parents and the general public who may use assistive devices while accessing board services. Training is focused on how to interact with people using assistive devices rather than on the technical use of the assistive devices. Students and staff have separate and specific procedures related to their personal use of assistive devices.

### **3.3 Communication re: Use of Assistive Devices:**

#### **Assistive Devices Carried by Persons with Disabilities**

- The Board website will indicate that all Board facilities provide services that respect the independence and dignity of people with disabilities and offer services that include the use of assistive devices.
- Each Board facility that is open to the public will post information in the front office/reception area that welcomes the use of assistive devices and encourages users to seek support from staff and volunteers as they require it.

### Assistive Devices/Services – Made Available by the Board

- The Board website, as applicable, will indicate the availability of assistive devices provided by the Board or Schools to assist in provision of services to people with disabilities.
- Each Board facility that is open to the public will, as applicable, post information in the front office/reception area that indicates the availability of assistive devices, and encourage potential users to seek support from staff and volunteers as they require it.

(\*Note – these could include:

**Assistive devices:** TTY service, telephones with large numbers, amplifiers, lifts.

**Services:** Sign language interpretation, oral interpretation, real-time captioning.

**Alternate service methods:** Assistance of a staff person to complete a transaction, e.g., school registration.)

### 3.4 Assistive Accessibility Standards for Customer Service:

Moving personal assistive devices;

- If you have permission to move a person in a wheelchair remember to: wait for and follow the person's instructions; confirm that the person is ready to move; describe what you are going to do before you do it; avoid uneven ground and objects that create bumpy and unsafe ride; and practice consideration and safety – do not leave the person in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors.
- Do not move items or equipment, such as canes and walkers, out of the user's reach.
- Respect personal space. Do not lean over a person with a disability or lean on their assistive device.
- Let the person know about accessible features in the immediate environment (automatic doors, accessible washrooms, etc.).  
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How to use TTY and Canada Relay Services:

- How to make a call with a TTY and the Relay System: Push the ON switch Push the DISPLAY switch if you wish to use the screen alone or the PRINT switch if you want what is typed both on screen and in print. Place the telephone receiver on the TTY's rubber receptacles. Make sure that the receiver is firmly in place and that the telephone's receiver cord is on the LEFT side of the TTY. Check the telephone indicator light, if it is lit, you have the line. Dial the number, and watch the telephone light; if it is flashing slowly, this indicates that the device on the other end is ringing. When the person you are calling answers, you will see a phrase appear on the screen such as; "Hello, Richard Smith here, GA." The "GA" stands for "Go

Ahead". Don't forget to use it whenever you have finished speaking so the other person will know it's his or her turn to speak. The person who receives the call is always the one who starts typing first. When the call is over and you want to advise the other person that you are ready to get off the phone, type "SK". "SK" means Stop Keying. The other person will respond by typing "SK" if he or she agrees that the call is completed. To be courteous, each person waits until the other one has indicated "SK" before hanging up the phone. Always switch the TTY "OFF" as soon as you have finished the call.

#### **4.0 Use of Service Animals by General Public**

The Board will welcome all members of the school and broader community to our facilities by committing our staff and volunteers to providing services that respect the independence and dignity of people with disabilities. Such services to incorporate these measures would include, but are not limited, to the use of service animals.

##### **4.1 Definition/Explanation of Service Animal:**

A 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 physician or nurse.

Additional Information:

- Examples of service animals include dogs used by people who have vision loss, hearing alert animals for people who are deaf, deafened or hard of hearing and animals trained to alert an individual to an oncoming seizure and lead them to safety. The Customer Service Standard's provisions also apply to animals providing other services to people with disabilities.
- It is "readily apparent" that an animal is a service animal when it is obvious by its appearance or by what it is doing. For example, it may be readily apparent that an animal is a service animal if it is wearing a harness, saddle bags, a sign that identifies it as a service animal or has a certificate or identification card from a service animal training school or an identification card from the Attorney General of Ontario. It may also be readily apparent if a person is using the animal to assist him or her in doing things, such as opening doors or retrieving items.

##### **4.2 Responsibility:**

Supervisory Officers, Principals and Departmental Managers will ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

##### **4.3 Access to Board premises:**

Any person with a disability who is accompanied by a service animal will be welcomed on Board and/or school premises with his or her service animal and will be accompanied by the service animal while on the premises. Access will be in accordance with normal security procedures. This requirement applies only to those areas of the premises where the public or third parties customarily have access and does not include places or areas of the school or board offices where the public does not have access.

#### **4.4 Service Accessibility Standards for Customer Service:**

This procedure deals solely with the individual's right to be accompanied by a service animal. Access to classrooms for service animals used by students and staff is covered under separate procedures.

Exclusion of Service Animal:

- A service animal can only be excluded from access to the premises where this is required by another law. 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., kitchen of school cafeteria or culinary arts classroom) although service dogs are permitted where food is served and sold (e.g., school cafeteria or lunchroom).
- Where there is a risk to the health and safety of another person as a result of the presence of a service animal, consideration must be given to options available prior to exclusion of a service animal. An example would be a situation where an individual has a severe allergy to the service animal. It is the Board's expectation that the situation be fully analyzed and all measures to eliminate the risk be considered, e.g., creating distance between the two individuals concerned, making reasonable alterations to schedules, etc.
- A service animal can be excluded if it is of a breed that is prohibited by law. An example would be the Ontario Dog Owners' Liability Act, which places restrictions on pit bull terriers.

Alternative Measures if Service Animal Must be Excluded:

- In the rare instance where a service animal must be excluded, the Board must make every effort to put alternative arrangements in place to provide the services required by the person with a disability. This could involve leaving the animal in a secure area where it is permitted by law and discussing with the person how best to serve them, e.g., a person with a vision disability might need someone (a member of staff or volunteer) to guide them.
- When it is necessary to confirm an animal is a Service Animal.
- Where an animal is not a trained guide dog and it is not readily apparent that the animal is a service animal, the school or Board staff member may ask the person using the service animal for a letter from a physician or nurse confirming that the animal is needed because of a disability. The letter does not need to identify the disability, why the animal is needed or how it is used.
- Where the person using the service animal regularly attends at the school or Board facility, the Principal or Departmental Manager may request to keep a copy of the letter on file but only as long as required by the circumstances. Alternatively, the person using the service animal may be asked to bring a letter with them on occasions when they visit the premises. The Principal or Departmental Manager shall

preserve the confidentiality of the letter and information contained in the letter, and shall not use or disclose the letter or information except as provided for in the Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990, cM56, or as otherwise required by law.

## **5.0 Use of Support Person by the General Public**

The Board will welcome all members of the school and broader community to our facilities by committing our staff and volunteers to providing services that respect the independence and dignity of people with disabilities, such service to incorporate measures that include, but are not limited to, the use of support persons.

### **5.1 Definition/Explanation of Support Person:**

A support person is a person who assists or interprets for a person with a disability who accesses the services of the Board. A support person is distinct from an employee who provides support services to a student or staff person in the system – separate and specific procedures apply.

Additional Information:

- A support person is an individual chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services. 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.
- The support person could be a paid professional, a volunteer, a friend or a family member. He or she does not necessarily need to have special training or qualifications.

### **5.2 Responsibility:**

Supervisory Officers, Principals and Departmental Managers will ensure that staff receive training in interacting with people with disabilities who are accessing Board services accompanied by a support person.

### **5.3 Access to Board premises:**

Any person with a disability who is accompanied by a support person will be welcomed on Board and/or school premises with his or her support person. Access will be in accordance with normal security procedures.

- This requirement applies only to those areas of the premises where the public or third parties customarily have access and does not include places or areas of the school or Board offices where the public does not have access.

## 5.4 Support Accessibility Standards for Customer Service:

### Confidentiality:

- Where a support person is accompanying a person with a disability, who is the parent/guardian of a student, for the purpose of assisting in a discussion that may involve confidential information concerning the student, the Superintendent, Principal or other staff member must first secure the consent of the parent/guardian regarding such disclosure.
- Consent to the disclosure of confidential information in the presence of the support person must be given in writing by the parent or guardian.
- The support person must also provide assurance in writing to safeguard the confidentiality of information disclosed in the discussion.
- A copy of the signed consent document will be retained in the school/Board office.
- If the parent/guardian uses a different support person for subsequent meetings, a new signed consent will be required. (A sample of a consent document is provided below).

### Support Persons Accompanying a Person with a Disability at School Events for Which There is an Admission Fee:

- Where an individual with a disability who is accompanied by a support person wishes to attend a school, family of schools or Board-organized event for which a fee is charged, the notice of the event will include information as to whether support persons will be charged a fee and specify the amount of the fee.

### Where the Board may Require the Presence of a Support Person:

- The Board may require a person with a disability to be accompanied by a support person when on the premises, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises.

(NOTE: This would be a highly rare situation and would only occur where, after consultation with the person with the disability, requiring a support person is the only means available to allow the person to be on the premises and, at the same time, fulfill the Board's obligations to protect the health or safety of the person with a disability or of others on the premises. It is further noted that people with disabilities are free to accept a reasonable risk of injury to themselves just as other people do. Different individuals will have a different tolerance for risk. Risk should be weighed against any benefit for the person with a disability. It is not enough that the support person might help to protect health and safety; a support person must be necessary or essential to protect health and safety before you can require one – the risk cannot be eliminated or reduced by other means. Any considerations on protecting health or safety should be based on specific factors and not on assumptions. (Just because someone has a disability doesn't mean they're not capable of meeting health or safety requirements.)

**Sample Notice of Consent Form:**

I, (parent/guardian) consent to the sharing of confidential information by (name of principal/teacher/other staff member) related to my child/ward (name) in the presence of my support person (name).

My support person (name) consents to safeguarding the confidentiality of the information shared.

Affirmation of consent:

Parent/Guardian

Signature \_\_\_\_\_ Date \_\_\_\_\_

(Printed Name of Parent/Guardian)

I undertake to safeguard the confidentiality of information shared between (school staff) and (parent/guardian) for whom I am a support person.

Support Person

Signature \_\_\_\_\_ Date \_\_\_\_\_

(Printed Name of Support Person)

Signature of Witness –

Principal/Staff Member \_\_\_\_\_ Date \_\_\_\_\_

(Printed Name of Staff Person)

Cross Reference		Date of Implementation	Legal/Ministry of Education Reference
Section	Number	February 2010	Accessibility for Ontarians with Disabilities Act, 2005 (AODA)
		Date of Last Review	Accessibility Standards for Customer Service, Ontario Regulation 429/07
			Ontario Human Rights Code