



Department:	Human Resources
Subject:	Accessibility Standards Policy Previously: Accessibility Standard for Customer Service Policy
Policy Number:	HR21
Date Created/Approved by:	September 12, 2011
Date Revised/Approved by:	October 15, 2014 / ELT
Date Effective:	January 1, 2015

Purpose

The College is committed to providing accessible customer service to persons with disabilities, consistent with the principles of independence, dignity, integration and equality of opportunity. We are dedicated to providing persons with disabilities with the same opportunities to access and benefit from our goods and services in the same place and in a similar way as any other person.

This policy has been established in compliance with the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and Regulation 191/11, the *Integrated Accessibility Standards* ("the Regulation") under AODA. The purpose of this policy is to help identify and remove barriers that impede a person with disabilities from accessing the goods and services provided by the College.

This policy applies to all College employees, interns and anyone who provides services on behalf of the College.

Definitions

"Accessible" is something that can be easily accessed or used by a person with a disability.

"Accessible formats" refers to formats that are an alternative to standard formats and are accessible to people with disabilities. Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats used by persons with disabilities.

"Accommodations" are measures used to make something accessible to an individual with a disability. Provision of assistive devices or services, changes to policies, programs or procedures and allowing a person with a disability to participate, even though they may participate differently, are some examples of accommodations.

"Adaptive or assistive devices" include tools such as computers or special communication devices that facilitate access to information or services for people with disabilities. Assistive devices may also include registered service animals. Technology solutions may be simple, such as enabling existing features on the College's computers, or more complex involving unique combinations of hardware and software, such as those needed for voice or Braille output.



"Communication supports" refers to supports that individuals with disabilities may need to access information. These include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

"Customers" include applicants, members, employers, educational institutions, and members of the public.

"Disability" as defined by the Ontario Human Rights Code is:

- 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 a developmental disability;
- c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d) A mental disorder; or
- e) An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

The definition includes disabilities of different severity, visible as well as non-visible disabilities and disabilities the effects of which may come and go.

"Employee" is anyone who is employed by the College.

"Equality" means not only treating people the same way but also may mean treating people differently in order to ensure that they have access to information and services equal to persons without disabilities.

"Personal assistive devices" for the purpose of this policy are personal supports used by persons with disabilities that enable them to carry out the activities of daily living and allow access to College services. This includes, but is not limited to, personally-owned equipment such as power-mobility devices (i.e. power wheelchairs or scooters).

"Service animal" is an animal acting as a service animal for a person with a disability:

- a) If it is readily apparent that the animal is used by the person for reasons relating to their disability; or
- b) If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

"Support person" is an individual chosen by a person with a disability to provide services or assistance with communication, mobility, personal care needs, medical needs or access to goods or services. A support person is distinct from an employee who provides support services to a customer. A 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.



Policy

Customer Service Standard

The College is committed to providing services that respect the independence and dignity of people with disabilities who use assistive devices, support persons or service animals. College staff will ensure that access is granted in accordance with security procedures and only to those areas of the premises where customers customarily have access.

Assistive Devices and Personal Assistive Devices

College staff will be trained on how to support and interact with people using assistive devices and personal assistive devices while accessing College goods and services. Training does not include the technical use of assistive devices.

Support Persons

College staff will secure consent in writing regarding the disclosure of confidential information in the presence of a support person.

Service Animals

In the rare instance where a service animal must be excluded by law (e.g. *Health Protection and Promotion Act* or *Dog Owners' Liability Act*), the College will make every effort to put alternative arrangements in place to provide the services required by the person with a disability (e.g. discuss with the person how best to serve them - a person with a vision disability might need an individual to guide them).

Information and Communications Standards

The College is committed to making information and communications accessible to persons with disabilities. We will create, provide and receive information and communications in ways that are accessible to people with disabilities.

Feedback (deadline 2015)

The College will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

Accessible Formats and Communication Supports (deadline 2016)

The College will create, provide, and receive information and communications in ways that are accessible to people with disabilities. To accommodate this, the College will:

- a) Notify the public about the availability of accessible formats and communication supports. The College's website will state that accessible versions of all College forms and publications are available upon request, anywhere forms or publications are located.
- b) Upon the request for accessible communication formats or communication supports, the College will consult with the individual to determine their accessibility needs and the most appropriate accessible format or communication support.



- c) Accessible formats and communication supports shall be provided in a timely manner, taking into account the person's accessibility needs, and if a cost is involved, it will be no more than the regular cost charged to other persons.
- d) Inform employees of the College's policies (and any updates) used to support customers with disabilities. This information shall be provided to new College employees as soon as practicable after they begin employment.

Examples of accessible formats and communication supports include, but are not limited to:

- a) Reading written information to a person directly;
- b) Large print;
- c) Text transcripts of audio or visual information;
- d) Handwritten notes instead of spoken work;
- e) Information written in plain language; and
- f) An electronic document formatted to be accessible for use with a screen reader.

Exceptions to accessible formats and communication supports include:

- a) Information that the College does not control directly through a contract, unless it is educational or training material; or
- b) Information or communications that cannot be converted.

When it is not possible to convert requested material, the individual making the request must be provided with the following:

- a) An explanation as to why the information or communications are unconvertible; and
- b) A summary of the information or communications.

Accessible Websites and Web Content

The College will ensure that its Internet and SharePoint websites, including web content, meet the specifications of the Web Content Accessibility Guidelines (WCAG) 2.0, at level A, where required to do so.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, including access to the College's telephone system, website, and office at 438 University Avenue, the College will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time and a description of alternative facilities or services, if available.

The notice will be placed on the College's website in English and French and will be posted in the Reception area.



Employment Standards

Recruitment, Assessment or Selection Process

The College will inform its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process. To accommodate this, the College will:

- a) Require that all job postings include a statement informing all potential job applicants of accessibility accommodations for persons with disabilities.
- b) When notifying job applicants that they have been selected to participate further in an assessment or selection process, the College will inform the applicants that accommodations are available upon request in relation to the materials or processes to be used.
- c) If a selected applicant requests an accommodation, the College 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, the College will inform the successful applicant of its policies for accommodating employees with disabilities. This could be verbally, in person, by e-mail or in an offer letter.

Informing Employees of Supports

The College 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.

Accessible Formats and Communication Supports for Employees

Upon an employee's request, the College 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.

Examples of accessible formats or communication supports include, but are not limited to:

- a) Screen reader: access to the use of software such as a screen reader
- b) Electronic format: documents in an electronic format
- c) Text transcripts: text transcripts of visual or audio information

Documented Individual Accommodation Plans

The College will create and maintain Individual Accommodation Plans for employees requiring special accommodations due to a disability. These plans will be developed, implemented and revised by the Manager of Corporate Services, in consultation with the employee and the employee's Supervisor. The plan shall include the following elements:

- a) How an employee can participate in the development of the plan;
- b) How the employee will be assessed on an individual basis;



- c) The manner in which the College may request an evaluation by outside medical or other experts to determine if and how accommodation can be achieved;
- d) What, if any, supporting documentation the employee is required to provide to the College, outlining their disability;
- e) How the employee may obtain assistance from a representative from the workplace in the development of the plan;
- f) The steps taken to protect the privacy of the employee's personal information;
- g) The frequency with which the plan will be reviewed and updated and how it will be done;
- h) The manner in which reasons for denial, if any, will be provided; and,
- i) How the plan will be provided to the employee in a way that takes into account the employee's accessibility needs.

Individual Accommodation Plans will be kept in the employee's file, and will be updated or modified as needed. If the employee feels that updates or modifications to their Individual Accommodation Plan are required, they should contact the Manager of Corporate Services.

Performance Management, Career Development, and Advancement

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

Return to Work Process

The College 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 that the College will take to facilitate the return to work.

Workplace Emergency Response Information

The College's Health and Safety policy will provide alternative emergency response information for employees with a disability.

Built Environment Standard

The College will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces including service-related elements such as service counters and waiting areas.

Multi-Year Accessibility Plan

The College has developed a Multi-Year Accessibility Plan to meet the requirements of the Integrated Accessibility Standards Regulation (IASR). This plan outlines the College's phased in strategy to address current and future requirements of the AODA, thereby reducing or eliminating barriers to accessibility at the College. The Manager of Corporate Services will review this plan once every five years, in consultation with persons with disabilities. The Multi-Year Accessibility Plan is posted on the College's website and will be made available in accessible format upon request.



Kiosks

The College will consider the needs of people with disabilities when designing, procuring or acquiring self-service kiosks.

Training

The College shall ensure that training is provided to all staff on the requirements of AODA, the customer service standard, the Regulation and the Human Rights Code, as it pertains to persons with disabilities. The Manager of Corporate Services is responsible for conducting or arranging training for employees as well as updating employees on an ongoing basis when changes are made to the policies, procedures and practices.

Training will include an overview of AODA, the customer service standard, the Regulation and the Human Rights Code, including their purpose and the ways in which the College is meeting their requirements. A record of employees who have completed the training will be kept and will include training dates.

Modifications to This or Other Policies

Any policy of the College that does not respect and promote the dignity and independence of people with disabilities will be modified or removed. All College policies protect and promote the dignity and independence of people with disabilities.

Questions about this Policy

This policy exists to achieve service excellence to customers with disabilities. Questions about this policy may be directed to the Manager of Corporate Services.