

Topic:	Accessibility Standards for Customer Service
Effective:	January 2014
Cross-Reference:	Accessibility for Ontarians with Disabilities Act, 2005 (AODA) Integrated Accessibility Standards, Ontario Reg. 191/11 Halton District School Board Policy: Accessibility Planning Halton District School Board Administrative Procedures: Respectful Workplaces Free of Harassment and Discrimination, Faith Accommodations Equity and Inclusive Education Student Use of Guide Dogs, Service Dogs and Service Animals Ontario Human Rights Code
Revision Date:	May 2022
Review Date:	May 2024
Responsibility:	Executive Officer of Facility Services, General Manager of Human Resources

INTENDED PURPOSE:

The Halton District School Board is committed to providing services free of barriers and biases, to our students, parents/ guardians, the public and our staff. The Board strives to ensure key principles of independence, dignity, integration and equality of opportunity are reflected and valued in our learning and working environments. Our conduct demonstrates our belief in the strength diversity brings to our communities.

It is the practice of the Halton District School Board to provide environments that build independence, dignity and respect for our students, parents/guardians, the public and our staff. Further, 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.

The Customer Service Standard is directed specifically to parents and members of the community. Our staff and students with disabilities are covered under other Board policies, procedures, programs and services.

BOARD EXPECTATIONS:

The Halton District School Board will:

- make all reasonable efforts to ensure all policies, practices and procedures from the date of this Administrative Procedure forward are consistent with the principles of independence, dignity, integration and equality of opportunity to all with particular attention to persons with disabilities;
- welcome all members of the school and broader community to our facilities by committing our staff and volunteers to provide services that respect the independence and dignity of persons with disabilities, such service to incorporate measures that include but are not limited to the use of assistive devices and service animals;
- ensure greater awareness and responsiveness to the needs of a person with disabilities;
- provide appropriate training for all staff who deal with the public or other third parties on behalf of the Board;
- provide training 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;
- ensure its policies and procedures related to the Accessibility for Ontarians with Disabilities Act, 2005 are made available to the public and also ensure there is capacity to provide communication about these policies and procedures in a format that takes into account a person's disability;
- ensure a disruption of service notice be posted at the site and on the Board's website when services normally provided to a person with a disability are temporarily unavailable such as access to an elevator;

- develop a process for receiving and responding to feedback in order to monitor the effectiveness of implementation of the Accessible Customer Service Standard. Information about the feedback process will be readily available to the public and will allow people to provide feedback using a number of methods;
- take into account the impact on persons with disabilities when purchasing new equipment, designing new systems or planning a new initiative so adherence to this policy can be achieved efficiently and effectively;
- create a feedback process that will review the implementation of this policy with the Board's various constituency groups (e.g., Special Education Advisory Committee (SEAC), employee unions /associations, citizens' groups) and methods to include the use of electronic means such as websites;
- 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.

DEFINITIONS:

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

Assistive Device: 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, electronic communication devices.

Service Animal: 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: 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: any person or organization acting on behalf of, or as an agent of the Board (e.g. bus operators, psychologists).

Barriers to Accessibility: 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 communications barrier, an attitudinal barrier, a technological barrier.

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

Accessibility Standard:***Monitoring and Feedback on Accessible Customer Service***

The Halton District School Board is committed to monitoring the effectiveness of 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 has created a feedback process that reviews the implementation of this procedure with the Board's various constituency groups. Examples include, but are not limited to, the Special Education Advisory Committee (SEAC), employee unions / associations, and citizens' groups. Methods would include electronic means such as websites.

PROCEDURES:**1. Responsibility**

1.1. The Director of Education and/or designates will implement a process for feedback on accessible customer service that has the following components:

- a) Information on the Board and school websites inviting users of Board services to provide feedback on their experience with access to services for people with disabilities.
- b) Printed information available through school offices and public offices of the Board to invite people with disabilities to provide feedback on their experience with or concerns about the

accessibility of services. Consideration should be given to providing information in alternate formats.

c) Information on how the Board will respond to feedback.

- 1.2. The Director of Education and/or designates will create a process for reviewing implementation of the policy on Accessibility Standards for Customer Service that includes consultation with various constituency groups including the Special Education Advisory Committee (SEAC), unions, associations, citizens' groups. Consultation methods could include electronic feedback and focus groups.

2. Methods for Feedback

- 2.1. A range of methods for soliciting feedback will be employed to ensure optimum access to the feedback process by people with disabilities.
- 2.2. Methods will include e-mail, telephone or in person.
- 2.3. The feedback process should include the title(s) of the person(s) responsible for receiving feedback and indicate how the Board's response to the feedback will be made known.

3. Proactive Measures for Accessible Customer Service

- 3.1. To ensure ongoing efficient and effective adherence to the Board's Administrative Procedure on Accessibility Standards for Customer Service, the Board, its school-based administrators and its managers, including those representing the Board in multi-board consortia, will take into account the impact on people with disabilities when purchasing new equipment, designing new systems or planning a new initiative.

Accessibility Standard:

Notification of Disruption of Service

The Halton District School Board is aware that members of the general public and students in schools rely on certain facilities, services or systems in order to access the services of the school or board offices. Elevators, for example, are important to people with mobility disabilities to access various areas of board facilities. Other systems and services designed to meet the needs of people with disabilities can include barrier-free washrooms, amplification systems, and note-taking or Text Telephone/Teletype Terminal/TeleTypewriter (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. When services normally provided to a person with a disability are temporarily unavailable, a disruption of service notice will be communicated in a variety of formats.

PROCEDURES:

1. Responsibilities

- 1.1. Supervisory Officers, Principals, Departmental Managers, Board Communications and Facilities Services specialists 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.

2. Notice of Disruption of Services

- 2.1. Notice will be given by posting the information at a conspicuous place at or in the school and/or board facilities. Other options that may be used include: posting on the board and/or school website; through direct communication with users of the services in accordance with school practice
- 2.2. Notice will be provided in multiple formats.
- 2.3. If the disruption is planned, notice will be provided in advance of the disruption. If the notice is unplanned, notice will be provided as soon as possible after the disruption has been identified
- 2.4. The notice of disruption of service 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.

Accessibility Standard:***Use of Service Animals by the General Public***

The Halton District School Board will welcome all members of the school and broader community to our facilities by committing our staff and volunteers to provide 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 service animals.

Definition/Explanation of Service Animal:

Service animals have training to perform specific tasks for people with disabilities. A service animal may be identified in two ways: it is visibly apparent that the individual requires an animal relating to disability; or the individual provides an identification card, or letter from a healthcare practitioner, confirming the individual requires the animal relating to a disability.

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 standards also apply to animals providing other services to people with disabilities.

PROCEDURES:**1. Responsibilities**

- 1.1. 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.

2. Access to Board premises

- 2.1. 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.
- 2.2. 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.
- 2.3. 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.

3. Exclusion of Service Animal

- 3.1. 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 animals are permitted where food is served and sold (e.g., school cafeteria or lunchroom).
- 3.2. 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.
- 3.3. 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.

4. Alternative measures if Service Animal must be excluded

- 4.1. 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].

5. When it is necessary to confirm an animal is a Service Animal

- 5.1. Where an animal is not a trained service 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 healthcare professional confirming that the animal is required because of a disability. The letter does not need to identify the disability, why the animal is needed or how it is used.
- 5.2. Where the person using the service animal regularly attends the school or board facility, the principal or department 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 department 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.

Accessibility Standard:

Use of Support Person by the General Public

The Halton District School Board welcomes all members of the school and broader community to our facilities by committing our staff and volunteers to provide 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 support persons.

Definition/Explanation of Support Person:

A support person is an individual 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 and these instances are covered under separate and specific procedures.

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, volunteer, a friend or a family member. He or she does not necessarily need to have special training or qualifications.

PROCEDURES:

1. Responsibility

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

2. Access to Board premises

- 2.1. 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.
- 2.2. 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.

3. Confidentiality

- 3.1. Where a support person is accompanying an individual with a disability, who is the parent/guardian of a student, or is an adult 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 written consent of the parent/guardian or adult student regarding such disclosure.
- 3.2. Consent to the disclosure of confidential information in the presence of the support person must be given in writing by the parent or guardian or adult student.
- 3.3. A copy of the signed consent document will be retained in the school/board office.
- 3.4. If the parent/guardian or adult student uses a different support person for subsequent meetings, a new signed consent will be required.
- 3.5. Appendix 1, *Consent to Disclose Personal Health Information* must be signed when information from regulated health professionals (e.g. psychologists, social workers and speech language pathologists) is being shared with the parent/guardian or adult student accompanied by a support worker.
- 3.6. Appendix 2, *Consent to Personal Information* is to be used for all other communication about a student involving a support person accompanying the parent/guardian or adult student.

4. Support Persons Accompanying a Person with a Disability at School Events for which there is an admission fee

- 4.1. 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.

5. Where the Board may require the presence of a Support Person

- 5.1. 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.
- 5.2. 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 one 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.

Accessibility Standard:***Use of Assistive Devices by the General Public***

The Halton District School Board welcomes all members of the school and broader community to our facilities by committing our staff and volunteers to provide 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.

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. Assistive devices for communication can include TTY, telephones with large numbers, and amplifiers. In addition, services may include sign language interpretation, oral interpretation, and real-time captioning.

PROCEDURES:

1. Responsibility

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

2. Communication re Use of Assistive Devices

- 2.1. 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. This information is also posted on the board website.
- 2.2. In the event of any service disruption, each board facility that is open to the public will, as applicable, post information electronically and in the front office/reception area advising of disruption of services and directing individuals to seek assistance from staff as outlined in posted messages.