

Multi-Year Accessibility Plan

2014 to 2018

**THIS DOCUMENT IS AVAILABLE IN ALTERNATE FORMATS UPON
REQUEST**

Statement of Commitment

Statement of Organizational Accessibility Commitment

St. Michael's College School is committed to excellence in serving all customers and is dedicated to meeting the needs of people with disabilities through the implementation of the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* in a timely manner, adhering to the Act's principles of independence, dignity, integration and equal opportunity.

Complying with the Accessibility Standards for Customer Service Regulation

St. Michael's College School ("St. Michael's") has been in compliance with the Accessible Customer Service Standards Regulation since 2012. We continue to ensure that in our day-to-day activities, we fulfill all the requirements of this Regulation in keeping with the principles of dignity, independence, equality and integration. For example:

- St. Michael's ensures that all new staff receive training on the requirements of the Regulation, with particular emphasis on **respect and dignity for** all people.
- We welcome feedback in person, by mail or email, by telephone and by fax. The public is also encouraged to provide feedback using the St. Michael's website.

Complying with the 2012 Requirements of the Accessible Employment Standards Regulation

St. Michael's meets the requirements of Section 27 of Accessible Employment Standards within the IASR. Under this section, we are required to provide individualized workplace emergency response information to employees who have a disability. If the employee requires assistance in case of an emergency, and consented to have information about his or her accommodation needs shared, St. Michael's will provide the workplace emergency response information to the person designated by St. Michael's to provide assistance to the employee.

- St. Michael's employees have been notified of our commitment to work with them to create individual workplace emergency response information. The availability of accommodations is communicated to all employees on a regular basis. Alternate formats are used if required by specific employees. Our respectful process ensures privacy for people who self-identify as needing accommodation.
- St. Michael's has provided its educators with accessibility awareness training related to accessible program and course delivery and instruction.

Meeting our Accessibility Commitment Going Forward

Introducing the St. Michael's Five-Year Accessibility Plan

- This Five-year plan was created to comply with Section 4 of the Integrated Accessibility Standards Regulation, which requires large organizations like St. Michael's to establish, implement, maintain and document a multi-year accessibility plan by January 1, 2014.
- In 2017 there are new requirements related to exterior paths of travel; accessible parking; obtaining services, and maintaining accessible parts of our public spaces under the Design of Public Spaces Regulation. We are also required to continue to comply with the Accessible Customer Service Standards.
- Much of our work in 2018 will be to ensure that we maintain our accessibility practices and fine-tune them to align with feedback. When the Accessible Built Environment Standards become law, we will integrate our strategies for any requirements that apply to St. Michael's into a revised version of our Five-year Accessibility Plan.

Our Detailed Plan: Strategies and Milestones

2014

A Snapshot of Accessibility Progress in 2014

This year St. Michael's will ensure that it continues to comply with existing accessibility requirements under both the Accessibility Standards for Customer Service Regulation and the IASR. We will also come into compliance with the General Requirements of the IASR to create an accessibility policy for the IASR and our first multi-year accessibility plan. In addition, beginning January 1, 2014 new websites and content on those sites will be compliant with WCAG 2.0 Level A.

Accessibility Standards for Customer Service Regulation

In 2014 and every year of the Plan and beyond, St. Michael's will continue to ensure that it is in compliance with the Accessibility Standards for Customer Service Regulation. More specifically:

- St. Michael's continues to provide accessible customer service training to every person who deals with members of the public or who participates in developing our policies, practices and procedures governing the provision of goods and services to the public; including all associates, contractors and others who provide service on behalf of St. Michael's.
- St. Michael's continues to gather feedback on the goods and services it provides and acts on that feedback to improve services to people with disabilities.
- St. Michael's continues to post appropriate notices regarding service disruptions.
- St. Michael's continues to ensure that any new policies that are created regarding customer service are consistent with the principles of dignity, independence, integration and equal opportunity.
- St. Michael's continues to welcome people with disabilities who use assistive devices such as support persons or service animals, and we train our staff on assistive devices use in our facilities.

- St. Michael's provides prior notice of a fee for a support person where and if it is charged.

Integrated Accessibility Standards Regulation (IASR)

General Requirements

Accessibility policy

Section 3 of the Regulation requires large organizations to develop, implement and maintain policies governing how they achieve or will achieve accessibility requirements by January 1, 2014. Section 3 also requires private sector organizations to have a statement of commitment and to use reasonable efforts to make their policies consistent with the principles of dignity, independence, integration and equal opportunity.

Five-year Accessibility Plan

Section 4 of the IASR requires large organizations to create a multi-year plan by January 1, 2014. We are also required to post a copy of our policies and plans on our website and provide alternate formats upon request.

St. Michael's has met these requirements before the deadline,

- A policy for the Integrated Accessibility Standards Regulation is available on our website and in alternate formats on request;
- Our commitment to accessibility is part of our accessibility policies and this Five-year Accessibility Plan: it includes goals which encompass the principles of dignity, independence, integration and equal opportunity;
- We have completed the Five-year Accessibility Plan before the due date of January 1, 2014;

- This Five-year Accessibility Plan is posted on our website; print copies and alternate formats are available on request.

Self Service Kiosks

St. Michael's will have regard to accessibility for persons with disabilities when designing, procuring or acquiring self service kiosks.

Information and Communication Standard

Accessible Websites and Web Content

Beginning January 1, 2014, all new internet websites or websites undergoing a major refresh, and web content on those sites conform to Web Content Accessibility Guidelines or WCAG at the 2.0A level.

- A review of the current and pending websites has been conducted to determine the level of accessibility provided.
- Web developers and web content providers have been trained on WCAG in relation to their duties.
- Internal expertise is in development for on-going accessibility for all internet websites and content.

2015

A Snapshot of Accessibility Progress in 2015

2015 is the year that large organizations like St. Michael's must ensure that employees and volunteers are trained on the IASR and Human Rights Code. In addition, we must provide accessible or conversion ready formats of the textbooks or training materials we produce, and ensure that our library provides, procures or acquires by other means accessible or conversion ready formats of print-based resources or

materials, on request. St. Michael's must also ensure that our feedback processes are accessible to persons with disabilities and provided in accessible formats and communication supports on request.

IASR General Requirements

St. Michael's will provide training on the accessibility standards referred to in this Regulation and on the Human Rights Code. The training will target every person who deals with members of the public or who participates in developing St. Michael's' policies, practices and procedures governing the provision of goods and services to the public; including all associates, contractors and others who provide service on our behalf by January 1, 2015.

- St. Michael's will provide the required training to its employees as appropriate to the duties of that employee.
- St. Michael's will maintain records of training including the dates and number of trained people.
- New employees and volunteers will receive training on the Accessibility Standards for Customer Service Regulation, on the IASR and on the Human Rights Code during their orientation period.

Accessible Information and Communications Standard

Feedback:

Section 11 of these Standards requires, by January 1, 2015, that all our feedback processes be accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports on request. St. Michael's must also notify the public about the availability of accessible formats and communication supports.

- St. Michael's and its other lines of business accepts feedback through its website and those other means as required.
- Alternate formats are available on request for all feedback forms.

Producers of Educational or Training Material

By January 1, 2015, when requested, St. Michael's will make accessible or conversion ready versions of the educational or training textbooks we produce for educational or training institutions, in accordance with Section 17 of the IASR.

Libraries of Educational and Training Institutions

Section 18 of this Standard requires St. Michael's library to provide, procure or acquire by other means an accessible or conversion ready format of print-based resources or material upon request by January 1, 2015.

2016

A Snapshot of Accessibility Progress in 2016

By January 1, 2016 all of St. Michael's Employment practices must be accessible. While many of our existing employment practices already meet requirements under the Accessible Employment Standards, we ensure that all of our employment practices throughout the employment life cycle meet these standards of accessibility. We are also required to provide or arrange for information in accessible formats and communication supports for persons with disabilities on request.

Information and Communication Standard

Accessible Formats and Communication Supports:

Section 12 of the IASR requires, by January 1, 2016, that all large organizations provide or arrange for information in accessible formats and communication supports for persons with disabilities on request. St. Michael's will ensure that requested information is:

- Provided in a timely way;
- Provided at no extra cost;

- Provided following consultation with the person making the request to determine the most appropriate format or support.

Accessible Employment Standard

St. Michael's will ensure compliance with the 2012 requirement to provide employees with individualized emergency response plans. New employees with accommodation needs will develop individual emergency accommodation plans with their managers. Revisions will be made to the plans for existing employees if their accommodation needs change.

Other requirements for this standard come into effect for St. Michael's by January 1, 2016. St. Michael's will ensure that it has met these requirements by that date and has complied with the intent of this standard to ensure accessibility is incorporated into the entire employment life cycle.

Recruitment:

In compliance with Sections 23 and 24,

- St. Michael's notifies its employees and the public about the availability of accommodations for applicants with disabilities during the interview process.
- St. Michael's will notify successful applicants of its policies for accommodating employees with disabilities when offering employment. This notice will be included in the letter of offer to the successful applicant.

Informing Employees with Disabilities of Supports Available to Them:

In compliance with Section 25,

- St. Michael's will inform all employees of its policies for supporting employees with disabilities, including providing employment-related accommodations. Information will be provided through newsletters, staff memos, email and staff meetings.
- New employees will receive this information during the on-boarding process.
- All employees will be given updated information whenever there is a change to existing policies on the provision of job accommodations.
- Employees will be assured that their privacy is respected and that any sharing of information about their accommodation needs will be discussed with them and plans for communication made with their consent.

Accessible Formats and Communication Supports for Employees:

In compliance with Section 26,

St. Michael's will consult with employees who have disabilities to provide them with the accessible formats and communication supports they require to do their job effectively.

Individual Accommodation Plans

In compliance with Section 28,

St. Michael's will have in place a written process for the development of documented individual accommodation plans for employees with disabilities, including the following elements,

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;
- The means by which the employee is assessed on an individual basis;
- The manner in which the employer can request an evaluation by an outside medical or other

expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved;

- 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;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee; and
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

St. Michael's' individual accommodation plans will,

- If requested, include any information regarding accessible formats and communications supports provided;
- if required, include individualized workplace emergency response information; and
- Identify any other accommodation that is to be provided.

Return to Work

In compliance with Section 29,

St. Michael's has a process for the provision of accommodations where needed when an employee returns to work. (Accommodation Policy- Temporary)

1. Human Resources evaluates and approves the current return to work process.
2. Modified work or specific accommodations may be provided.
3. Talent Development coordinates the appropriate Return to Work training as required.

St. Michael's will formally document this process in compliance with Section 29 of these standards.

Performance Management and Career Development

In compliance with Sections 30 and 31,

St. Michael's will review the accessibility needs of employees with disabilities with regard to: performance management and career development – in ways that take their accessibility needs into account, including performance plans in accessible formats as well as coaching and feedback.

Redeployment

In compliance with Section 32,

St. Michael's will review the accessibility needs of our employees with disabilities, as well as accommodation plans with regard to employee reassignment to other departments or jobs within our organization as an alternative to lay off, when we have eliminated a particular job or department.

2017

A Snapshot of Accessibility Progress in 2017

2017 marks a jump forward in our accessibility progress. When building new or making major changes to existing public spaces larger organizations like St. Michael's must meet applicable requirements under Section 80 of the IASR related to public spaces, including: exterior paths of travel; accessible parking; obtaining information; and maintenance of accessible public spaces. There are no new requirements under the IASR or the Accessible Customer Service Regulation for this year for our organization. St. Michael's will continue to comply with all requirements described earlier in this plan.

Design of Public Spaces Standard

Exterior Paths of Travel: St. Michael's ensures,

All technical requirements for structures that are connected to, provided on, or provided along exterior paths of travel are met, including:

- Ramps;
- Stairs;
- Curb Ramps;
- Depressed Curbs;
- Rest Areas.

Accessible Parking

Off-Street Parking: St. Michael's ensures,

- At least one parking space is provided for the use of persons with disabilities;
- An additional three percent of parking spaces are provided for the use of persons with disabilities;
- Parking spaces for the use of persons with disabilities are evenly distributed between wider Type A parking spaces and standard Type B parking spaces;
- Type A and B spaces meet all technical requirements;
- Parking spaces for the use of persons with disabilities are distributed in a manner that provides substantially equivalent or greater accessibility in terms of distance from an accessible entrance.

Access Aisles: St. Michael's ensures,

- Access aisles that allow persons with disabilities to get in or out of their vehicles are provided for all parking spaces for the use of persons with disabilities;
 - Access aisles may be separate or shared by two parking spaces
- Access aisles meet all technical requirements.

Signage: St. Michael's ensures,

- Parking spaces for the use of persons with disabilities are distinctly indicated by an accessible permit parking sign;
- Type A parking spaces are further indicated as "van accessible";
- Signage meets all technical requirements.

Obtaining Services

Service Counters: St. Michael's ensures,

- At least one service counter is accessible to people who use mobility aids;
- Service counters are low enough for someone sitting in a mobility aid;
- Service counters have sufficient clear space for someone sitting in a mobility aid, including space for the person's knees;
- Accessible service counters are identified with accessible signage.

Fixed Queuing Guides: St. Michael's ensures,

- The guides provide sufficient width to allow for the passage of mobility aids and mobility assistive devices;
- The guides have sufficiently clear floor area to permit mobility aids to turn where queuing lines change directions;
- The guides are cane detectable.

Waiting Areas: St. Michael's ensures,

- Within waiting areas with seating fixed to the floor at least three percent of seating is accessible to someone using a mobility aid;
- All waiting areas have at least one accessible seating space.

Maintenance

St. Michael's ensures,

- Our Multi-year Accessibility Plan includes preventative and emergency maintenance procedures for the accessible parts of our public spaces, including posting of regular maintenance schedules and letting people know about alternatives;
- Procedures for handling temporary disruptions in service when an accessible part of our public spaces stops working are added to the Plan.

2018

A Snapshot of Accessibility Progress in 2018

There are no new requirements for our organization for 2018. Our Five-year Accessibility Plan will expire this year. Therefore we will prepare a new multi-year plan to begin in 2019.

We Welcome Your Feedback
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