

# Integrated Accessibility Standards Regulation Policy

## Purpose

This policy is drafted in accordance with the Integrated Accessibility Standards (Ontario Regulation 191/11) and addresses how St. Michael's College School achieves or will achieve accessibility by meeting the requirements of the regulation. **The requirements will be met within the timeframes set in the Regulation.**

The requirements of the regulation include:

- the establishment, implementation, maintenance and documentaton of a multi-year accessibility plan, which outlines St. Michaels' strategy to prevent and remove barriers and meet its requirements under this Regulation;
- the incorporation of accessibility features when designing, procuring or acquiring self-service kiosks;
- training;
- the specific requirements under the Information and Communication Standards, the Employment Standards and the Design of Public Spaces Standards.

This policy is supported by procedures/departmental policies that outline the detailed processes and accommodations pursuant to this policy.

## Definitions

- a) **Accessible formats** may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- b) **Accommodation** means the special arrangements made or assistance provided so that customers with disabilities can participate in the experiences available to customers without disabilities. Accommodation will vary depending on the customer's unique needs.
- c) **Amenities** means items that provide conveniences or services for use by the public, examples of which include drinking fountains, benches and garbage receptacles.
- d) **Communication supports** may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- e) **Communications** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.
- f) **Conversion ready** means an electronic or digital format that facilitates conversion into an accessible format.

- g) **Curb ramp** means a ramp that is cut through a curb or that is built up to a curb.
- h) **Depressed curb** means a seamless gradual slope at transitions between sidewalks and walkways and highways, and is usually found at intersections.
- i) **'Disability'** is:
- a. Any degree of physical disability, 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 impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
  - 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;
  - 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.
- j) **Educators** means employees who are involved in program or course design, delivery and instruction, including staff of school boards.
- k) **Information** includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that conveys meaning.
- l) **Maintenance** means activities that are intended to keep existing public spaces and elements in existing public spaces in good working order or to restore the spaces or elements to their original condition, examples of which include painting and minor repairs.
- m) **Off-street parking facilities** includes open area parking lots and structures intended for the temporary parking of vehicles to which the public has access whether or not the payment of a fee is charged and includes visitor parking spaces in parking facilities.
- n) **Redeveloped** means planned significant alterations to the public spaces, but does not include maintenance activities, environment mitigation or environmental restoration.
- o) **Rest area** means, in respect of recreational trails and exterior paths of travel, a dedicated level area that is intended for public use to allow persons to stop or sit.
- p) **Type A** means a wider parking space with a minimum width of 3,400 mm and signage that identifies the space as "van accessible".
- q) **Type B** is a standard parking space with a minimum width of 2,400 mm.
- r) **Volunteer** may include a person who voluntarily undertakes a task on behalf of St. Michael's.

## 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.

### Mandatory Requirements

#### General

##### (1) **Accessibility Plans**

- I. The multi-year St. Michael's College School Accessibility Plan ("the plan") outlines the strategy to prevent and remove barriers for five years between 2014 and 2018, and to meet its requirements under the regulation;
- II. The plan will be posted on the St. Michael's College School ("St. Michael's") website, [www.stmichaelscollegeschool.com](http://www.stmichaelscollegeschool.com), and will be provided in alternate formats upon request;
- III. The plan will be reviewed and updated at least once every five years.

##### (2) **Self- Service Kiosks**

- I. St. Michael's currently does not have self service kiosks, nor does it have plans to use self service kiosks in the foreseeable future; however, if and when they are considered, accessibility features will be incorporated in the design and procurement of such kiosks.

##### (3) **Training**

- I. St. Michael's will ensure that training is provided on the requirements of accessibility standards referred to within the Integrated Accessibility Standards (Ontario Regulation 191/11) and on the *Human Rights Code* as it pertains to persons with disabilities for,
  - a. All employees and volunteers;
  - b. All persons who participate in developing St. Michael's' policies; and
  - c. All other persons who provide goods, services or facilities on behalf of St. Michael's.
- II. The training provided is appropriate to the duties of employees, volunteers and other persons.
- III. Training is provided as soon as practicable to employees, volunteers and other persons.
- IV. Where there are changes to the Integrated Standards Accessibility Policy, training will be provided with regard to those changes.
- V. St. Michael's will maintain a record of the dates of when training is provided and the number of individuals to whom it was provided.

## **Information and Communication Standards**

### **(4) Feedback**

- I. St. Michael's' Customer Feedback process is available to persons with disabilities and does provide or arrange for the provision of accessible formats and communication supports upon request.

### **(5) Accessible Formats and Communication Supports**

- I. St. Michael's will, 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.
- II. St. Michael's will consult with the person making the request in determining the suitability of an alternative format or communication support.

### **(6) Accessible websites and web content**

- I. St. Michael's will ensure that its websites are accessible to as many people as possible. When new internet, intranet websites and web content on those sites is developed it will conform with the WCAG 2.0 guidelines, in accordance with the Integrated Accessibility Standards Regulation.
  - a. All new internet websites and web content on those sites will comply to the WCAG 2.0 Level A by January 1, 2015.
  - b. As of January 1, 2021 all internet, intranet and web content will conform with the WCAG 2.0 Level AA, other than: success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded).
  - c. Websites and web content, including web-based applications, that St. Michael's controls directly or through a contractual relationship that allows for modification of the product, are included in this timeline, where practicable.
  - d. In determining practicability, consideration will be given to the availability of commercial software, or tools, or both, and whether planned or initiated implementation timelines (before January 2012) will be significantly impacted.

### **(7) Producers of educational or training material**

- I. St. Michael's makes accessible or conversion ready versions of educational or training textbooks it produces for educational or training institutions upon request.

### **(8) Libraries of educational and training institutions**

- I. St. Michael's library will provide, procure or acquire by other means an accessible or conversion ready format of print-based resources or materials, upon request.

- II. Special collection, archival materials, rare books and donations are exempt from this requirement.

**(9) *Training to Educators***

- I. St. Michael's has provided its educators with accessibility awareness training related to accessible program or course delivery and instruction.

**Employment Standards ( To be implemented in accordance with the timeline set out in the Regulation)**

**(10) *Recruitment***

- I. St. Michael's will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.
- II. During a recruitment process, applicants who are individually selected to participate in an assessment or selection process will be notified that accommodations are available upon request in relation to the materials or processes use.
- III. If a selected applicant requests an accommodation, St. Michael's will consult with the applicant , having regard for the applicant's accessibility needs, on the provision of a suitable accommodation.
- IV. When making an offer of employment, St. Michael's will notify the successful applicant of its policies for accommodating employees with disabilities.

**(11) *Informing employees of supports***

- I. St. Michael's will inform its employees of its policies used to support employees with disabilities, including, but not limited to, policies on job accommodation that take into account the employee's accessibility needs due to a disability.
  - a. New employees will be informed as soon as practicable after they begin their employment.
  - b. Where there are changes to existing policies on the provision of job accommodation, all employees will be provided updated information.

**(12) *Accessible formats and communication supports for employees***

- I. When an employee requests it, St. Michael's will 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 for the employee to perform the employee's job; and
  - b. Information that is generally available to employees in the workplace.
- II. St. Michael's will consult with the employee making the request in determining the suitability of an accessible format or communication support.

**(13) Workplace emergency response information**

- I. St. Michael's provides individual workplace emergency response information to employees who have a disability,
  - a. Where the disability is such that individual information is necessary; and
  - b. Where St. Michael's is aware of the need for accommodation due to the employee's disability.
- II. If an employee with individualized workplace emergency response information requires assistance and provides consent, St. Michael's will provide the individualized information to the person designated by St. Michael's to provide assistance to the employee.
- III. Individualized information is provided as soon as practicable after St. Michael's becomes aware of the need for accommodation due to an employee's disability.
- IV. St. Michael's will review the individualized workplace emergency response information,
  - a. When the employee moves to a different location;
  - b. When the employee's overall accommodation needs or plan are reviewed;
  - c. When St. Michael's reviews its general emergency response policies.

**(14) Documented individual accommodation plans**

- I. St. Michael's will develop a written process for the development of Individual Accommodation Plans for employees with disabilities.

**(15) Return to work**

- I. St. Michael's will implement a documented 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.

**(16) Performance Management**

- I. Where St. Michael's uses performance management in respect of its employees, the accessibility needs of employees with disabilities, and individual accommodation plans are taken into account.

**(17) Career Development and Advancement**

- I. Where St. Michael's uses career development and advancement in respect of its employees, the accessibility needs of employees with disabilities, and individual accommodation plans are taken into account.

**(18) Redeployment**

- I. Where St. Michael's uses career development and advancement in respect of its employees, the accessibility needs of employees with disabilities, and individual accommodation plans are taken into account in redeployment.

**Design of Public Spaces Standards**

St. Michael's also has responsibilities under the Design of Public Spaces Standard when building new or making significant changes to its existing public spaces on or after January 1, 2017.

**(19) Exterior Paths of travel**

- I. St. Michael's provides and intends to maintain accessible paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose and not to provide a recreational experience.
- II. St. Michael's meets all technical requirements for structures that are connected to, provided on, or provided along exterior paths of travel, including:
  - a. Ramps;
  - b. Stairs;
  - c. Curb ramps;
  - d. Depressed curbs;
  - e. Rest areas.

**(20) Accessible Parking**

Off-Street Parking

- I. St. Michael's provides, intends to maintain and meets the technical requirements of at least the minimum number of parking spaces required for the use of person with disabilities,
  - a. One parking space provided for the use of persons with disabilities; and
  - b. Additional three percent of parking spaces provided for the use of persons with disabilities.
  - c. Parking spaces for the use of persons with disabilities distributed evenly between Type A wider spaces and Type B standard spaces.
  - d. Parking spaces provided for the use of persons with disabilities distributed in a manner that provides substantially equivalent or greater accessibility in terms of distance from an accessible entrance.

Access Aisles

- I. St. Michael's provides, intends to maintain and meets the technical requirements of access aisles, shared or separate, between Type A and B parking spaces that allow persons with disabilities to get in or out of their vehicles

Signage

- I. St. Michael's provides, intends to maintain and meets the technical requirements for accessible permit parking signage that distinctly indicates Type A and B parking spaces for the use of persons with disabilities; Type A parking spaces are further indicated as "van accessible".

**(21) Obtaining Services**

Service Counters

- I. St. Michael's provides at least one service counter that is accessible to people who use mobility aids such as wheelchairs.
  - a. The counter is low enough for someone sitting in a mobility aid;
  - b. The counter has sufficient clear space for the person's knees;
  - c. The service counter is clearly identified with sufficient signage.

Waiting Areas

- I. St. Michael's provides and intends to maintain waiting area seating that includes,
  - a. At least three percent of seating in waiting areas that have seating fixed to the floor that is accessible for someone using a mobility aid;
  - b. No fewer than one accessible seating space.

**(22) Maintenance**

- I. St. Michael's' accessibility plan includes its preventative and emergency maintenance procedures for the accessible parts of its public spaces, including posting of regular maintenance schedules and letting people know about alternatives.
- II. Procedures for handling temporary disruptions in service when an accessible part of St. Michael's' public spaces stops working is also part of the plan.