

Customer Service Accessibility Standard



**Waterloo Catholic
District School Board**

September, 2009

**IN COMPLIANCE WITH ONTARIO REGULATION 429/07
UNDER THE ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005**

Rationale for the Policy and Administrative Procedures

The Waterloo Catholic District School Board (WCDSB) is committed to providing services to our students, parents/guardians, the public and our staff that are free of barriers and biases. The WCDSB 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.

Policy Statement

It is the policy of the Waterloo Catholic District School Board to provide an environment in all of its facilities that builds 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.

Legal Framework

- √ *Ontarians with Disabilities Act, 2001 (ODA)*
- √ *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*
- √ Ontario Regulation 429/07 -- Accessibility Standards for Customer Service
- √ Ontario Human Rights Code

Board References

- √ Board Policy I 001 – “Ends”
- √ Board Policy IV 002 – “Treatment of the Public”
- √ Board Policy IV 003 – “Treatment of Students”
- √ Board Policy IV 004 – “Treatment of Staff”
- √ Board Policy IV 009 – “Asset Protection”
- √ Board Policy IV 010 – “Facilities / Accommodations”
- √ APH 020 – “Use of Guide Dogs in Schools”

Definitions

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 Contractor:

...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 communications 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 Expectations

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 its facilities by committing staff and volunteers to providing 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.
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 applicable 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 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.
6. When services that are normally provided to a person with a disability are temporarily unavailable (such as access to an elevator) a disruption of service notice will be posted at the site and communicated by other appropriate means.

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 new initiatives.
9. The Board will create a feedback process that will review the implementation of this policy with the Board's various constituency groups. Examples include the Special Education Advisory Committee (SEAC), the Parent Involvement Committee (PIC), teacher federations, unions and citizens' groups and methods 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.

ADMINISTRATIVE PROCEDURES

Standard for Monitoring and Feedback on Accessible Customer Service

BACKGROUND:

The Waterloo Catholic District School Board will monitor 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 will create a feedback process that will review the implementation of this policy with the Board's various constituency groups, including the Special Education Advisory Committee (SEAC), the Parent Involvement Committee, the Joint Health & Safety Committee and school councils.

ADMINISTRATIVE PROCEDURE

1.0 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 or concerns about 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 accessibility of services;
- (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), the Parent Involvement Committee, the Joint Health & Safety Committee and school councils.

2.0 Methods for feedback

- 2.1 A range of methods for soliciting feedback will be employed at board sites to ensure optimum access to the feedback process by people with disabilities. Feedback methods may include e-mail, verbal input, a suggestion box or feedback card.
- 2.2 The feedback process will provide 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.

3.0 Proactive measures for accessible customer service

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

Sample Notice For Feedback

NOTICE:

The Waterloo 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 Waterloo Catholic District School Board provides services to people with disabilities can be made by emailing info@wcdsb.ca OR by calling your local school or the WCDSB head office (519-578-3660) OR by writing to the Waterloo Catholic District School Board (35 Weber St., W., P.O. Box 91116, Kitchener, ON N2G 4G2) OR by completing the survey posted online at www.wcdsb.ca/accessibility.

All feedback will be directed to the Senior Manager of Public Affairs / Executive Officer.

Responses to signed feedback will be provided in writing if a return postal or email address is given. Unsigned correspondence will not be answered.

Standard for Notification of Disruption of Service

BACKGROUND:

When services that are normally provided to a person with a disability are temporarily unavailable (such as access to an elevator) a disruption of service notice will be posted at the site. Should the temporary unavailability persist for an extended period, notice will be posted on the Board's website.

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. Escalators 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, 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.

ADMINISTRATIVE PROCEDURE

4.0 Responsibility

4.1 Supervisory Officers, Principals and Departmental Managers 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.

5.0 How must the notice of disruption of services be provided?

5.1 Notice may be given by posting the information at a conspicuous place at or in the school or at or in board facilities. Notice of extended unavailability of services will be posted on the WCDSB website.

5.2 Notice of planned service disruptions affecting access will be provided in advance of the disruption. If the disruption is unplanned, notice will be provided as soon as possible after the disruption has been identified.

6.0 What must be included in the notice of disruption of services?

6.1 The notice of disruption of service must include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.

Sample Notices

Sample 1

To: Parents, Guardians and Community Users of our School

Maintenance work will make the main door of the school and the access ramp inaccessible from May 1 to May 8. A temporary ramp has been set up that gives access to the door at the east of the school building. We regret this inconvenience. If you have questions or concerns, please contact _____ at [phone number].

Thank you.

Principal

Sample 2

To: Visitors to the Education Centre

Our accessible main floor washroom is out of service due to a broken pipe. Repairs are underway and the washroom is expected to be usable again by tomorrow. In the interim, we have made arrangements for our visitors to use the accessible washroom in the Downtown Kitchener Community Centre, which is attached to our premises. We apologize for this inconvenience.

Thank you.

Superintendent of Facilities

Standard for Use of Assistive Devices by the General Public

Applicable Reference from Accessible Customer Service Policy Statement:

The Board will welcome all members of the school and broader community to its facilities by committing 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.

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, or electronic communication devices.

ADMINISTRATIVE PROCEDURE

7.0 Responsibility

- 7.1 Supervisory Officers, Principals and Departmental Managers will ensure that applicable Board employees are trained as necessary to support parents and the general public who may use assistive devices while accessing board services.
- 7.2 Staff training is focused on how to interact with people using assistive devices rather on the technical use of the assistive devices.
- 7.3 **Special Note:** Students and staff are covered by separate and specific policies and procedures related to their personal use of assistive devices.

8.0 Communication re: use of Assistive Devices

Assistive Devices carried by persons with disabilities

- 8.1 The Board website and each school website will indicate the availability of services that respect the independence and dignity of people with disabilities and offer services that include the use of assistive devices as appropriate.

8.2 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

8.3 The Board website and school websites, as applicable, will indicate the availability of assistive devices provided by the Board or school to assist in provision of services to people with disabilities.

8.4 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.

Tips for helping someone with an Assistive Device

Many users of Board services and facilities who have disabilities will have their own personal assistive devices. These may include:

- √ wheelchairs;
- √ scooters;
- √ walker;
- √ amplification devices that boost sound for listeners who are hard-of-hearing without reducing background noise;
- √ hearing aids;
- √ oxygen tanks;
- √ electronic notebooks or laptop computers;
- √ personal data managers;
- √ communication boards used to communicate using symbols, words or pictures;
- √ speech-generating devices that “speak” when a symbol, word or picture is pressed.

One should not touch or handle an assistive device without permission.

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.).

Standard for Use of Service Animals by the General Public

Applicable Reference from Accessible Customer Service Policy Statement:

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

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 qualified in a discipline relevant to the person's 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 standard's provisions also apply to animals who provide 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.

ADMINISTRATIVE PROCEDURE

9.0 Responsibility

9.1 Supervisory Officers, Principals and Departmental Managers will ensure that Board 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.

10.0 Access to Board premises

10.1 Unless otherwise restricted (see section 11), 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 be accompanied by the service animal while on the premises. Access will be in accordance with normal security procedures.

10.2 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.

10.3 **Special Note:** Access to classrooms for Guide Dogs used by students and staff is covered under a separate Board administrative procedure policy.

11.0 Exclusion of Service Animal

11.1 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 *HPPA* 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).

11.2 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.

11.3 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.

12.0 Alternative measures if Service Animal must be excluded

12.1 In the rare instance where a service animal must be excluded, the Board will 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.

13.0 When it is necessary to confirm an animal is a Service Animal

13.1 Where an animal is not a trained guide dog and it is not readily apparent that the animal is a service animal, a school or Board staff member may ask the person using the service animal for a letter from a physician or nurse professionally qualified to comment on their particular area of disability 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.

13.2 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 confidentiality of the information in the letter is protected by the *Freedom of Information and Protection of Privacy Act*.

Standard for Use of Support Person(s) by the General Public

Applicable Reference from Accessible Customer Service Policy Statement:

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

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.

Special Note: A support person is distinct from an employee or other person who provides support services to a student or staff person in the system – separate and specific procedures apply to students and staff.

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.

ADMINISTRATIVE PROCEDURE

14.0 Responsibility

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

15.0 Access to Board premises

15.1 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.

15.2 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.

16.0 Confidentiality

16.1 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 Principal must first secure the consent of the parent/guardian regarding such disclosure.

16.2 Consent to the disclosure of confidential information in the presence of the support person must be given in writing by the parent or guardian.

16.3 The support person must also provide assurance in writing to safeguard the confidentiality of information disclosed in the discussion.

16.4 A copy of the signed consent document will be retained in the school/board office.

16.5 If the parent/guardian uses a different support person for subsequent meetings, a new signed consent will be required.

17.0 Support Persons accompanying a person with a disability at school events with an admission fee

17.1 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.

18.0 Where the Board may require the presence of a Support Person

18.1 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.

SAMPLE 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 ____
(Printed Name of Parent/Guardian)

Date: _____

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 ____
(Printed Name of Support Person)

Date: _____

Signature of Witness – Principal/Staff Member
(Printed Name of Staff Person)

Date: _____

ANNUAL REVIEW / UPDATE

This document will be reviewed annually and updated as required.