

HR708: Accessibility for Persons with Disabilities

Policy Title:	Accessibility for Persons with Disabilities
Policy Number:	HR708
Owner:	Human Resources and Organizational Development
Approved by:	College Executive Team (CET)
Effective Date:	March 21, 2010 Revised: January 30, 2017
Reference:	
Links to Other Policy:	AODA Integrated Accessibility Standards Regulation (HR703)

St. Lawrence College is committed to making our resources usable by all people, whatever their abilities or disabilities. This document will be made available in alternative format upon request.

PURPOSE

At St. Lawrence College, we believe in and promote the rights of all persons with disabilities as stated in the **Canadian Charter of Rights and Freedoms**, the **Ontario Human Rights Code**, the **Accessibility for Ontarians with Disabilities Act (2005)** and its related **Accessibility Standards Regulations**. The College also affirms the rights of all persons, including those with disabilities, to have access to equal opportunity in employment, education, accommodation and in business dealings with the College.

SCOPE

This policy shall apply to every employee of St. Lawrence College.

1.0 GUIDING PRINCIPLES

The College further affirms its commitment to promoting the following principles in all of its policies and interactions with persons with disabilities:

- **Dignity** - treating those with disabilities as customers and clients who are as valued and deserving of effective and full service as any other customer.
- **Independence** – freedom from control or influence of others; the person has freedom to make his/her own choices.
- **Integration** – allowing people with disabilities to fully benefit from the same services, in the same place and in the same or similar ways as others.
- **Equal opportunity** – having the same chances, options, benefits and results as others.

2.0 OBJECTIVES

In accordance with the aforementioned principles, the College strives to provide, short of undue hardship:

- a framework for the adoption of and compliance with all regulatory standards legislated by the government of Ontario vis-à-vis Accessibility for Ontarians with Disabilities;
- equal access to services, facilities and educational programs;
- equal opportunity in employment;
- a learning and work environment that is free of discrimination;
- the continual improvement of access to college property, facilities and services;
- the development, publication, and review of our annual Accessibility Plan – developed with the participation of persons with disabilities;
- quality services – both what we deliver and how we deliver services to all members of the college community.

All areas of the College are accountable for ensuring accessibility.

3.0 FRAMEWORK

Consistent with the Accessibility for Ontarians with Disabilities Act's purpose of achieving "accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before

January 1, 2025”, St. Lawrence College strives to provide an accessible learning and work environment for all persons with disabilities.

This policy is a resource to the college community in its efforts to ensure the College is accessible to persons with disabilities, and in compliance with the regulations set forth by the Government of Ontario. As such, this policy mirrors the regulatory standards developed by, or in development by, the government and its representatives on the standards development committees. Provincial committees have been working on developing specific standards in all areas within a sequential completion and implementation schedule. The full Act is expected to be implemented by 2025.

These regulatory standards include:

1. Integrated Accessibility Standard Regulations, Ontario Regulation 191/11
 - a. General Requirements
 - b. Customer Service Standard
 - c. Information and Communication Standard
 - d. Employment Standard
 - e. Transportation Standard
 - f. Design of Public Spaces Standard

To fulfill these commitments, St. Lawrence College will develop appropriate policies and procedures, which will be monitored and reviewed, to ensure access and accommodation for all persons with disabilities.

4.0 DEFINITIONS

The definition of disability used in this policy is the same as that used by the Accessibility for Ontarians with Disabilities Act (2005) and the Ontario Human Rights Code. That is, a disability is:

Word/Term	Definition
Disability	(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, 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.

5.0 ANNUAL ACCESSIBILITY PLANNING

As per the **Ontarians with Disabilities Act (2005)**, St. Lawrence College will carry out annual Accessibility planning and ensure that representation from persons with disabilities from within the college community are part of the process. The plan and report will be publicly available.

Providing Goods and Services to Persons with Disabilities

6.0 STANDARD FOR ACCESSIBLE CUSTOMER SERVICE

In its provision of goods and services to members of the public with disabilities, the College will do so following the principles of **independence, dignity, integration** and **equality of opportunity**.

7.0 AUTHORITY

All areas of the College are accountable for ensuring that the principles of this policy are upheld. However, it is the responsibility of the Vice President, Student Services and Human Resources, to ensure that this policy is reviewed every three years, and as required, to ensure adherence to developing law.

PROCEDURE – AODA CUSTOMER SERVICE STANDARD – PROVIDING GOODS AND SERVICES TO PERSONS WITH DISABILITIES

Action	Responsibility
<p>1.0 Our Goal</p> <p>The goal of St. Lawrence College is to promote the rights of all persons with disabilities as stated in the Canadian Charter of Rights and Freedoms, the Ontario Human Rights Code, the Accessibility for Ontarians with Disabilities Act (2005) and its related Accessibility Standards Regulations. The College affirms the rights of all persons, including those with disabilities, to have access to equal opportunity in employment, education, accommodation and in business dealings with the College.</p>	<p>Human Resources & Organizational Development</p>
<p>2.0 Our Commitment</p> <p>St. Lawrence College strives to provide its goods and services in ways that respect the dignity and independence of persons with disabilities. We are committed to giving persons with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.</p>	<p>Human Resources & Organizational Development</p>
<p>3.0 Providing Goods and Services to Persons with Disabilities</p> <p>St. Lawrence College is committed to serving all persons including persons with disabilities as we will carry out our functions and responsibilities in the following areas:</p> <p>3.1 Communication</p> <p>We will communicate with persons with disabilities in ways that take into account their disability.</p> <p>We will train staff who communicate with students, clients and visitors on how to interact and communicate with persons with various types of disabilities.</p>	<p>Human Resources & Organizational Development</p> <p>Human Resources & Organizational Development</p>

<p>3.2 Telephone Service</p> <p>We are committed to providing accessible telephone service to our students, clients and visitors. We will train staff to communicate with persons over the telephone in clear and plain language and to speak clearly and slowly. We will offer to communicate with students, clients and visitors with disabilities by email or in writing if telephone communication is not suitable to their communication needs or is not available.</p> <p>Practice: All managers of staff who deal directly with the public on an on-going basis will ensure that each staff member is familiar with the communication options available when interacting with students/visitors with disabilities.</p>	<p>Human Resources & Organizational Development</p>
<p>3.3 Assistive Devices</p> <p>We are committed to serving persons with disabilities who use assistive devices to obtain, use or benefit from our goods and services. Assistive devices may include, but are not limited to the following examples: hearing aids, white canes, wheelchairs, walkers, electronic organizers, magnifying devices, electronic voice synthesizers, amplification devices, communication boards – using symbols, words or pictures to communicate.</p> <p>We will ensure that our staff members are trained and familiar with various assistive devices that may be used by students, clients and visitors with disabilities while accessing our goods or services.</p> <p>We will ensure that designated staff members know how to use the following assistive devices available on our premises for students, clients and visitors with disabilities: fm systems, computer software programs. If there is a limitation on the use of a specific assistive device during a testing situation,</p>	<p>Human Resources & Organizational Development</p>

<p>that information will be clearly communicated to our students with disabilities.</p> <p>Practice: On a yearly basis the Assistive Technologist on each campus will hold an assistive technology demonstration where staff can become familiar with the latest technology and assistive devices being used by our students and visitors. The adaptive technologist will act as a resource person for demonstration and clarification purposes.</p> <p>3.4 Billing</p> <p>We are committed to providing accessible invoices to all persons with disabilities and we will provide invoices in alternative formats upon request.</p> <p>Procedure: When a student with a disability requests to receive the registration payment form in an alternative format, please contact the Registrar’s Office. When a non-student requests an invoice in an alternative format, please contact the Financial Services department. Each request will be responded to in a timely fashion. Response time will depend on the alternative format requested.</p>	<p>Registrar’s Office</p> <p>Registrar’s Office/Financial Services department</p>
<p>4.0 Use of Service Animals and Support Persons</p> <p>4.1 Use of Service Animals</p> <p>We are committed to welcoming persons with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. It is understood that each person who uses a service animal is in total control of the animal at all times while on the premises. We will ensure that all staff, volunteers and others dealing with the public are properly trained in how to</p>	<p>Human Resources & Organizational Development</p>

interact with persons with disabilities who are accompanied by a service animal.

Practice: All managers will ensure that their staff members follow the guidelines outlined in the AODA training. Service animals are working animals, therefore, no contact is recommended.

According to Regulation 562, Food Premises, Health Protection and Promotion Act, 1990, Service Animals are prohibited from entering all of the food preparation areas on our premises. If a student with a disability uses a service animal and needs to enter our food preparation area/s as part of a course requirement, then the student is welcome to use the assistance of a support person instead of a service animal. The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:

- A member of the College of Audiologists and Speech-Language Pathologists of Ontario;
 - A member of the College of Chiropractors of Ontario;
 - A member of the College of Nurses of Ontario;
 - A member of the College of Occupational Therapists of Ontario;
 - A member of the College of Optometrists of Ontario;
 - A member of the College of Physicians and Surgeons of Ontario;
 - A member of the College of Physiotherapists of Ontario;
 - A member of the College of Psychologists of Ontario;
- or

<p>○ A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.</p> <p>If it is not readily apparent that the animal is being used for reasons relating to his or her disability, the College may request verification from a regulated health professional.</p> <p>4.2 Use of Support Persons</p> <p>We are committed to welcoming persons with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter St. Lawrence College’s premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises with the exception of testing situations. In those specific situations a student’s Disability Counsellor will determine the conditions under which a test is taken.</p> <p>Admission fees will not be charged to a support person when the college offers a college created or sponsored event (i.e., sporting event, entertainment event). When fees are charged for non-college sponsored events being held at the college then a notice of the fee structure will be clearly outlined on all advertising for that event.</p> <p>Practice: When St. Lawrence College holds or sponsors an event where a fee is charged, it will be clearly stated that the fee does not apply to support persons. Conference Services will include information about the fee information requirements for support persons in all rental agreements. Conference Services will ensure that when 3rd party events are carried out on college premises that the renters are</p>	<p>Human Resources & Organizational Development</p>
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<p>the disrupted service site providing specifics of the disruption including estimated disruption time frame. A map will also be posted at the disrupted service site indicating the location of alternate services and what route/s to follow to access the alternate service/s.</p> <p><u>Disrupted Service Notices</u></p> <p>Campus Security will be responsible for posting all Disrupted Service notices. Preconfigured forms, including preconfigured maps indicating alternate services and routes to their location have been designed for this purpose and are available for printing on the college server. All postings comply with the Print Clear guidelines.</p> <p><u>Types of Potential Disrupted Service: Class Cancellations</u></p> <p>Students will receive an e-mail informing them that a specific class will not be held on a specific day. As well, a notice of the class cancellation will be placed on the classroom door. School office staff and/or Student Services Representatives are responsible for this function.</p>	
<p>6.0 Training for Staff</p> <p>St. Lawrence College will provide training to all employees, volunteers and other third parties who act on their behalf, and all those who are involved in the development and approval of customer service policies, practices and procedures. This training will be provided to all new hires as part of their condition of employment.</p> <p>Training will include the following:</p> <ul style="list-style-type: none"> • The purposes of the Accessibility for Ontarians with Disabilities Act, 2015 and the requirements of the Customer Service Standard. • How to interact and communicate with persons with various types of disabilities. 	<p>Human Resources & Organizational Development</p>

- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- Information on the equipment or devices available on St. Lawrence College’s premises that may help with the provision of goods or services to persons with disabilities.
- What to do if a person with a disability is having difficulty in accessing our goods and services.
- St. Lawrence College’s policies, practices and procedures relating to the customer service standard.

All staff will be trained on policies, practices and procedures that affect the way goods and services are provided to persons with disabilities. Staff will be trained on an ongoing basis when changes are made to these policies, practices and procedures.

Timeline of Training

All college employees who have contact with the public will complete the training. The training will be delivered through HRdownloads. Staff hired after January 1st, 2010 will be required to complete the training as a condition of employment.

Practice:

Full- Time Hires: Human Resources & Organizational Development will include AODA training as a condition of employment for all new full- time hires after January 1st, 2010 and track for compliance.

Part-Time, Partial Load Hires: Hiring managers will use a form letter created by Human Resources & Organizational Development requiring that all part-time and partial-load employees must complete AODA training. Hiring managers will track compliance and forward the completion records to Human Resources & Organizational Development.

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<p><u>Records of Training</u></p> <p>The college will keep records of the training, including the date on which the training is provided. The training will be monitored by each manager and records of completion will be sent to the Human Resources & Organizational Development department. The Human Resources & Organizational Development department will keep track of the college-wide employee AODA training. This record keeping tracking method will continue as each new employee is hired and trained.</p>	<p>Human Resources & Organizational Development</p>
<p>7.0 Feedback Process</p> <p>In order to meet service expectations, the college will follow-up with all inquiries. Comments on our services regarding how well those expectations are being met are welcome and appreciated. Feedback regarding the way St. Lawrence College provides goods and services to persons with disabilities can be made by e-mail, telephone, online or in writing. All feedback will be directed to the office of the Vice President, Student Services and Human Resources. If contact information is included, a response to the feedback can be expected within 5 business days.</p> <p>Practice: Feedback Opportunities</p> <ol style="list-style-type: none"> 1. All feedback (print and email) will be directed to the office of the Vice President, Student Service and Human Resources. 2. Telephone Feedback: When a person phones to give feedback they will be directed to the following person: Manager, Employee Engagement – Kingston Campus: 613-544-5400 ext. 1842 Brockville Campus: 613-342-0660 ext. 1842 Cornwall Campus: 613-933-6080 ext. 1842 <p>Tracking of Feedback: Feedback information will be tracked by the Manager, Employee Engagement, who, upon receipt of the feedback, will enter it on a spreadsheet, which will be stored on a shared drive. The spreadsheet will document</p>	<p>Human Resources & Organizational Development</p>

<p>the following: the date, the nature of the feedback, the location/personnel within the college identified and the action taken in response to the feedback.</p>	
<p>8.0 Modifications to this or Other Policies</p> <p>We are committed to developing policies that respect and promote the dignity and independence of persons with disabilities. Therefore, no changes will be made to this policy before considering the impact on persons with disabilities.</p> <p>Any policy of St. Lawrence College that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.</p>	<p>Human Resources & Organizational Development</p>
<p>9.0 Questions about this Policy</p> <p>This policy exists to achieve service excellence to students, clients and visitors with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation can be provided by Human Resources & Organizational Development.</p>	<p>Human Resources & Organizational Development</p>

POLICY REVISION DATE

Created: March 21, 2010

Next Update Due: January 30, 2020

SPECIFIC LINKS

HR – 703 AODA Integrated Accessibility Standards Regulation