

**UTS Policy & Procedures with Respect to
The AODA Accessibility Standards
for Customer Service**

TABLE OF CONTENT

- 1. UTS Policy with Respect to the Accessibility Standards for Customer Service.**
- 2. Procedures:**
 - a. Notification of Disruptions of Service
 - b. Use of Support Person by the General Public
 - c. Use of Assistive Devices by the General Public
 - d. Use of Service Animals by the General Public
 - e. Monitoring and Feedback on Accessible Customer Service

UTS Policy with Respect to the Accessibility Standards for Customer Service

Rationale

In compliance with The Accessibility Standards for Customer Service, Ontario Regulation 429/07, created under the Accessibility for Ontarians with Disabilities Act, 2005, the University of Toronto Schools is committed to providing goods and services in a way that is accessible to all customers.

UTS believes that excellence in education is founded on respect for the dignity and humanity of all individuals and the development of human potential, enabling individuals and groups to participate and contribute fully within a diverse society. Equity, valuing diversity and inclusion are related yet distinct concepts which form the foundation of social justice and reflect values such as fairness, empathy, and respect for the dignity of all humans.

Practising equity involves proactively eradicating attitudes, actions, structures and systems that result in discrimination and exclusion. To this end, UTS is committed to the continual improvement of accessibility and the on-going removal of barriers in order to provide greater equity for all.

Policy Statement

It is the policy of UTS to provide an environment in all of its facilities that builds independence, dignity, integration, and equality of opportunity 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.

Definitions

Customer	any person who uses the goods and services of UTS.
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 Dog	a dog that is being used because of a person's disability. The dog's certification complies with UTS Policy for the 'Use of Service Dogs in Schools.'
Support Person	a person who assists or interprets for a person with a disability as he/she access the services of UTS. A support person is distinct from an employee who supports a student in the system.
Third Party Contractors	is any person or organization acting on behalf of or as an agent of UTS (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 UTS. This includes, but is not limited to, a physical barrier, an architectural barrier, information or communications barrier, an attitudinal barrier, or 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 UTS.

Expectations:

1. UTS 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. UTS will welcome all members of the school and broader school community to our facilities by committing our staff and volunteers to providing services that respect the independence and dignity of persons with disabilities. Such services are to incorporate measures that include but are not limited to the use of assistive devices and service dogs.
3. To ensure greater awareness, UTS will provide appropriate training for staff who are likely to deal with the public or other third parties on behalf of UTS.
4. UTS 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.
5. UTS will ensure that its policies and procedures related to the *Accessibility for Ontarians with Disabilities Act, 2005* are made available to applicants to the school and their families, and where appropriate 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 broadcast electronically (on the school's website, FirstClass or through email).
7. So that adherence to this policy can be achieved efficiently and effectively, UTS and all its administrators will take into account the impact on persons with disabilities when purchasing new equipment, designing new systems or planning a new initiative.
8. In order to monitor the effectiveness of implementation of the Accessible Customer Service Standard, UTS 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 variety of methods.
9. UTS will create a feedback process that will review the implementation of this policy with UTS' various constituency groups; for example, the UTS Board, the UTS Parents Association (UTSPA), UTS Student Council, UTS Alumni Association (UTSAA) staff and unions (OSSTF and USW).
10. UTS' will form an Accessibility Working Group (effective January 2012), to regularly review the effectiveness of the practices and procedures established under this policy.

Legal Framework

Ontario Human Rights Code

Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

Accessibility Standards for Customer Service, Ontario Regulation 429/07

Procedures

Each one of the procedures contained in this section relates back to a section of the UTS Policy with respect to Accessibility Standards for Customer Service.

The procedures in this section are all required under the legislation.

The language used refers to language from the regulation in most cases. Please be reminded that these procedures refer to “Customer Service” as it relates to members of the public, including parents. UTS already has other policies and procedures relating to staff and students with regard to accessibility, inclusion and equity. It is recommended that for legal reasons policies and procedures for staff and students, for example those related to the use of service animals or support persons, should be separate from those for the public.



Accessibility Standards for Customer Service

Notification of Disruption of Service

Applicable Reference from Accessible Customer Service Policy Statement:

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 a message will be sent out via the school's email network (FirstClass).

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. 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.

Generally, disruptions to all of the school's services, such as during a major storm or power outage, do not require this special notice. However, if the disruption has a significant impact on people with disabilities, a **notice of the disruption** should be provided.

ADMINISTRATIVE PROCEDURE

1.0 Responsibility

- 1.1 The Administration and UTS Facilities will ensure that the users of school services are notified when there is a disruption in services that may have an impact on access to services by people with disabilities.

2.0 How Must the Notice of Disruption of Services be Provided?

- 2.1 Notice may be given by posting the information at a conspicuous place in the school. Other options that may be used include: posting on the school website; through direct communication with users of the school's services in accordance with school practices.
- 2.2 Consideration should be given to providing notice in multiple formats.
- 2.3 If the disruption is planned, notice should be provided in advance of the disruption. If the notice is unplanned, notice should be provided as soon as possible after the disruption has been identified.

3.0 What Must be Included in Notice of Disruption of Services

- 3.1 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 – Access to School Building

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:

- UTS Facilities Coordinator Tiffiny Douglas at 416-946-3655, or
- UTS Manager of Facilities & HR Services, Julie Martin at 416-946-0225

Thank you.

Principal

Sample 2 – Accessible Washroom

To: Visitors to UTS

Our accessible boy's washroom in the basement 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 washrooms on the 2nd and 3rd floors.

Room 226: located on the 2nd floor just west of the elevator

Room 321: located on the 3rd floor east of the elevator

We apologize for this inconvenience.

Thank you.

UTS Facilities



Accessibility Standards for Customer Service Use of Support Person by the General Public

Applicable Reference from Accessible Customer Service Policy Statement:

UTS will welcome all members of the school and broader community to our facilities by committing our staff and volunteers to providing services that respect the independence and dignity of people with disabilities, such service to incorporate 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 UTS. A support person is distinct from an employee who provides support services to a student or staff person in the system – separate and specific procedures apply.

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. Any costs associated with the use of a support person must be borne by the client or client's family/guardians, or benefactors.

ADMINISTRATIVE PROCEDURE

1.0 Responsibility

- 1.1 The UTS Principal with assistance from the school administration will ensure that all staff, volunteers and others dealing with the public receive training in interacting with people with disabilities who are accessing UTS services accompanied by a support person.

2.0 Access to UTS premises

- 2.1 Any person with a disability who is accompanied by a support person will be welcomed on school premises with his or her support person. Access will be in accordance with normal 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 where the public does not have access. Policies and procedures relating to staff and students with regard to accessibility, inclusion and equity, are outlined in the school's Student/Parent and Staff handbooks.

3.0 Confidentiality

- 3.1 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 or other staff member (e.g. Vice-Principal, or teacher) must first secure the consent of the parent/guardian 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.
- 3.3 The support person must also provide assurance in writing to safeguard the confidentiality of information disclosed in the discussion.
- 3.4 A copy of the signed consent document will be retained by UTS and be placed in a confidential file (separate from other student files).
- 3.5 If the parent/guardian uses a different support person for subsequent meetings, a new signed consent will be required.

(A sample of a consent document is provided below)

4.0 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 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.

5.0 Where UTS may require the presence of a Support Person

- 5.1 UTS may require a person with a disability to be accompanied by a support person when on school 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 UTS' obligations to protect the health or safety of the person with a disability or of others on the premises.)

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 you 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. Just because someone has a disability doesn't mean they're not capable of meeting health or safety requirements.)

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 _____ Date _____

(Printed Name of Parent/Guardian) _____

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 _____ Date _____

(Printed Name of Support Person) _____

Signature of Witness –

Principal/Staff Member _____ Date _____

(Printed Name of Staff Person) _____

Accessibility Standards for Customer Service

Use of Assistive Devices by the General Public

Applicable Reference from Accessible Customer Service Policy Statement:

UTS will welcome all members of the school and broader community to our facilities by committing our 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, electronic communication devices.

ADMINISTRATIVE PROCEDURE

1.0 Responsibility

- 1.1 The UTS Principal with assistance from the school administration will ensure that all staff and volunteers are properly trained to support parents and the general public who may use assistive devices while accessing school services.
- 1.2 Training is focused on how to interact with people using assistive devices rather than on the technical use of the assistive devices.
- 1.3 Students and staff have separate and specific procedures related to their personal use of assistive devices.

2.0 Communication re Use of Assistive Devices

Assistive Devices Carried by Persons with Disabilities

- 2.1 UTS' Admission policies and related literature and web based information, as well as Student/Parent handbooks will indicate that UTS provides services that respect the independence and dignity of people with disabilities, including the use of assistive devices.
- 2.2 Areas catering to the public, such as front office/reception will include signs encouraging users of assistive devices to seek support from staff and volunteers as they require it.

Assistive Devices/Services – Made available by UTS

- 2.3 Although UTS accommodates the use of assistive devices, it does not have them in its inventory and it is expected that such devices will be purchased and/or brought to UTS premises by the individual requiring the devices. UTS will endeavour to provide the assistance of a staff person to complete a transaction (e.g. school registration)

(*Note – these could include:

Assistive devices: TTY service, telephones with large numbers, amplifiers, lifts.

Services: Sign language interpretation, oral interpretation, real-time captioning.

Alternate service methods: Assistance of a staff person to complete a transaction, e.g., school registration)

TIPS FOR SCHOOL ADMINISTRATION

The following pages contain useful information on:

- Interacting with people using Assistive Devices
- Use of TTY

TIPS FOR HELPING SOMEONE WITH AN ASSISTIVE DEVICE

Users of UTS services and facilities who have disabilities will have their own personal assistive devices.

Examples of personal assistive devices 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

Key Point To Remember: One should not touch or handle an assistive device without permission.

MOVING PERSONAL ASSISTIVE DEVICES

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.).

(The resource is excerpted from the e-learning course developed by the Accessibility Directorate of Ontario and modified for this use.)



Accessibility Standards for Customer Service

Use of Service Animals by General Public

Applicable Reference from Accessible Customer Service Policy Statement:

UTS will welcome all members of the school and broader community to our facilities by committing our staff and volunteers to providing services that respect the independence and dignity of people with disabilities, such service to incorporate 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.

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 providing 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

1.0 Responsibility

- 1.1 The UTS Principal with assistance from the school administration 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

2.0 Access to UTS premises

- 2.1 Any person with a disability who is accompanied by a service animal will be welcomed on 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 school 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 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 (found in the Student/Parent and Staff handbooks).

3.0 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, although service dogs are permitted where food is served and sold.

- 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 UTS' 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.

4.0 Alternative measures if Service Animal must be excluded

- 4.1 In the rare instance where a service animal must be excluded, UTS 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.

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

- 5.1 Where an animal is not a trained guide dog and it is not readily apparent that the animal is a service animal, the school member may ask the person using the service animal for a letter from a physician 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.
- 5.2 Where the person using the service animal regularly attends at the school, the Principal or a Vice-Principal, or the Executive Director of Human Resources 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, Vice-Principal, or Executive Director of Human Resources 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 required by law.



Accessibility Standards for Customer Service

Monitoring and Feedback on Accessible Customer Service

Applicable Reference from Accessible Customer Service Policy Statement:

UTS 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 UTS community and will allow people with disabilities to provide feedback using a number of methods.

UTS will create a feedback process that will review the implementation of this policy with the school's various constituency groups. Examples include but are not limited to UTS students, Employee unions*, parents, alumni and volunteer groups (e.g. UTSAA, UTSPA). Methods would include electronic means such as SurveyMonkey.

(*Note: Consultation relates to membership of these groups as **providers** of Accessible Customer Service.)

ADMINISTRATIVE PROCEDURE

1.0 Responsibility

- 1.1 The Principal and/or designates will implement a process for Feedback on Accessible Customer Service that has the following components:
 - (a) Information on the school's website and online conferences inviting users of UTS services to provide feedback on their experience with or concerns about access to services for people with disabilities
 - (b) Printed information available through the school inviting people with disabilities to provide feedback on their experience with or concerns about accessibility of services. Consideration should be given to providing information in alternate formats.
 - (c) Information on how UTS will respond to feedback.
- 1.2 The Principal 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. Consultation methods could include electronic feedback and verbal input through special group meetings.

2.0 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 could include e-mail, verbal input, suggestion box or feedback form.
- 2.3 The feedback process should include the title(s) of the person(s) responsible for receiving feedback and indicate how the school'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 school's policy on Accessibility Standards for Customer Service, UTS, its administrators and the Board of Directors will take into account the impact on people with disabilities when purchasing new equipment, designing new systems or planning a new initiative.

SAMPLE NOTICE RE FEEDBACK

UTS is committed to ensuring that its services meet optimum standards of accessibility for people with disabilities using the facilities and services of UTS. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way UTS provides services to people with disabilities can be made by **[insert the ways feedback can be provided, for example, e-mail, verbally, suggestion box, feedback card, etc.]**.

All feedback will be directed to **[insert title of person responsible for receiving feedback]**.

Response to your feedback will be provided as follows: **[indicate method, e.g., direct response to the individual, summary report on website, etc.]**