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## **Integrated Accessibility Standards Regulation – Customer Service AP 200.34**

<b>Procedure for:</b>	All Board Employees	<b>Adopted:</b>	December 8, 2009
<b>Submitted by:</b>	Superintendent of Education, Special Education	<b>Revised:</b>	December 21, 2016;
<b>Category:</b>	Students		April 24, 2018

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### **Purpose**

The Brant Haldimand Norfolk Catholic District School Board is committed to providing services to our students, parents/guardians, the public and our staff that are free of barriers and biases. The Brant Haldimand Norfolk Catholic District School Board strives to ensure that key principles of equal opportunity is reflected and valued in our Catholic learning and work environments. Our actions will demonstrate our belief in the strength diversity brings to our communities.

The Brant Haldimand Norfolk Catholic District School Board is also committed to ensuring that people with disabilities have the same opportunity of access to our services in a similar way as these services are available to all others we serve. We are committed to meeting, in a timely manner, the accessibility needs of students with disabilities in the provision of services related to customer service.

### **Responsibilities**

Supervisory Officers, Principals and Managers will ensure that all staff, volunteers and others providing customer service on behalf of the Board are trained in and adhere to the requirements of this Administrative Procedure.

### **Procedures**

#### **1.0 Monitoring and Feedback on Accessible Customer Service**

1.1 The Director of Education and/or designate will implement a process for feedback on Accessible Customer Service that has the following components:

1.1.1 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.

1.1.2 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. Consideration should be given to providing information in alternate formats.

1.1.3 Information on how the Board will respond to feedback.

The Director of Education and/or designate will create a process for reviewing the implementation of the policy on Accessibility Standards for Customer Service that includes consultation with various constituency groups including Special Education Advisory Committee (SEAC), Federations, unions and citizens' groups.



1.2 Methods of feedback:

1.2.1 A range of methods for soliciting feedback will be employed to ensure optimum access to the feedback process by people with disabilities. Feedback methods could include e-mail, verbal input, suggestion box or feedback card.

1.2.2 The feedback process should include 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. (Appendix A)

1.3 Proactive measures for accessible customer service:

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

## **2.0 Use of a Service Animal by the General Public**

2.1 Recognizing service animals:

2.1.1 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 designated health professional. 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 and 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.

2.2. Responsibilities:

2.2.1 Supervisory Officers, Principals and Departmental Managers 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.

2.2.2 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 will be accompanied by the service animal while on the premises unless otherwise restricted (2.3). Access will be in accordance with normal security procedures.

2.2.3 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.

2.2.4 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.



**1.3 Exclusion of service animal:**

- 2.3.1 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 services 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).
- 2.3.2 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 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.
- 2.3.3 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.
- 2.3.4 In the rare instance where a service animal must be excluded, the Board must 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.

**2.4 Confirming the status of a service animal:**

- 2.4.1 At times it may be necessary to confirm that an animal is a service animal. Where an animal is not a trained guide dog and it is not readily apparent that the animal is a service animal, the school or Board staff member may ask the person using the animal for a letter from a designated health professional confirming that the animal is needed because of the disability. The letter does not need to identify the disability, why the animal is needed or how it is used.
- 2.4.2 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 principal or departmental manager 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 provided for in the *Municipal Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, cM56, or as otherwise required by law.

**3.0 Use of Support Persons by the General Public**

- 3.1 A support person is a person who assists or interprets for a person with a disability who accesses the services of the Board. 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. 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.



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- 3.2 Supervisory Officers, Principals and Departmental Managers will ensure that staff members receive training in interacting with people with disabilities who are accessing Board services accompanied by a support person.
- 3.3 Access to Board premises and school events:
- 3.3.1 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.
  - 3.3.2 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.
  - 3.3.3 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 admission or participation fee will be waived for the identified support person.
  - 3.3.4 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.

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 the board's 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.

- 3.4 Confidentiality
- 3.4.1 Where a support person is accompanying a person with a disability, who is not the parent/guardian of a student, for the purpose of assisting in a discussion that may involve confidential information concerning the student, the superintendent, principal or other staff member must first secure the consent of the parent/guardian regarding such disclosure.
  - 3.4.2 Consent to the disclosure of confidential information in the presence of the support person must be given in writing. (See Appendix B)
  - 3.4.3 The support person must also provide assurance in writing to safeguard the confidentiality of information disclosed in the discussion.
  - 3.4.4 A copy of the signed consent document will be retained in the school/Board office.
  - 3.4.5 If the parent/guardian uses a different support person for subsequent meetings, a new signed consent will be required.



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#### **4.0 Use of Assistive Devices by the General Public**

- 4.1 Supervisory Officers, Principals and Departmental Managers will ensure that staff are trained to support parents and the general public who may use assistive devices while accessing Board services.
- 4.2 Staff training is focused on how to interact with people using assistive devices rather than on the technical use of the assistive devices. (See Appendix C.)
- 4.3 Special Note: Special needs students and staff have separate and specific procedures related to their personal use of assistive devices.
- 4.4 Communication re: use of assistive devices:
  - 4.4.1 The Board website and each school website will indicate that all Board facilities provide services that respect the independence and dignity of people with disabilities and offer services that include the use of assistive devices.
  - 4.4.2 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.
  - 4.4.3 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.
  - 4.4.4 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.

\*Note – these could include but are not exclusive to:

**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.

#### **5.0 Notice of Disruption of Service:**

- 5.1 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. Generally, disruptions to any of the Board's services, such as 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.
- 5.2 Supervisory Officers, Principals, Departmental Managers, Co-ordinator of Communications and Community Relations 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.
- 5.3 Notice may be given by posting the information at a conspicuous place at or in the school or at or in Board facilities. Other options that may be used include: posting on the Board and/or school website; through direct communication with users of the services in accordance with school practices. (See Appendix D).



- 5.4 Consideration should be given to providing notice in multiple formats.
- 5.5 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.
- 5.6 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.

**Definitions – N/A**

**References**

Accessibility for Ontarians with Disabilities Act, 2005 (AODA)  
Education Act  
Integrated Accessibility Standard, Ontario Regulation 191/11  
Ontarians with Disabilities Act, 2001 (ODA)  
Ontario Human Rights Code  
Equity and Inclusive Education Policy 200.23  
Accessibility Standards Policy 200.33  
Integrated Accessibility Plan 2018-2023 Policy 200.32  
Integrated Accessibility Standards Regulation – Employment Administrative Procedure 200.35  
Integrated Accessibility Standards Regulation – Information & Communications Administrative Procedure 200.36  
Integrated Accessibility Standards Regulation – Transportation Administrative Procedure 200.37  
Integrated Accessibility Standards Regulation – Design of Public Spaces 200.38  
Multi-Year Integrated Accessibility Plan 2018-2023



**APPENDIX A**

**Sample Notice for Feedback**

The Brant Haldimand Norfolk 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 Brant Haldimand Norfolk Catholic District School Board provides services to people with disabilities can be made by emailing **TBD** or by calling your local school or the Brant Haldimand Norfolk Catholic District School Board head office (519-756-) or by writing to the Brant Haldimand Norfolk Catholic District School Board (Box 217, 322 Fairview Drive, Brantford, Ontario, N3T 5M8) or by completing the survey posted online at \_\_\_\_\_.

All feedback will be directed to **TBD**

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



**APPENDIX B**

**Sample Consent Form for Support Persons**

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)**

Signature \_\_\_\_\_ Date \_\_\_\_\_

Printed Name of Staff Person \_\_\_\_\_

*Notice of Collection: In accordance with Section 29(2) of the Municipal Freedom and Protection of Privacy Act, 1989. This information is collected under the legal authority of Section 265(1)(d) of the Education Act, R.S.O. 1990 c. E.2 as amended, and may be used as necessary for some or all of the following principle administrative purposes related to: the Board's operation, school programs and educational services, student records, and Ministries of the Government of Ontario. If you have any questions, please contact the school principal and/or the Freedom of Information Officer, Brant Haldimand Norfolk Catholic District School Board, 322 Fairview Drive, Brantford, ON, N3T 5M8 (519-756-6505, Ext. 234).*



**APPENDIX C**

**Information on Interacting with People Using Assistive Devices**

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

- Wheelchairs
- Scooter
- Walker
- Amplification device that boost sound for listeners who are hard-of-hearing without reducing background noise
- Hearing aid
- Oxygen tank
- Electronic notebooks or laptop computer
- Personal data manager
- Communication board used to communicate using symbols, words or pictures
- Speech-generating device that “speak” when a symbol, word or picture pressed
- Assistive technology devices – software for use with a computer

**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
- 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 for 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.)

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How to use TTY and Canada Relay Services

How to make a call with TTY:

- Push the ON switch
- Push the DISPLAY switch if you wish to use the screen alone or the PRINT switch if you want what is typed both on screen and in print
- Place the telephone receiver on the TTY’s rubber receptacles. Make sure that the receiver is firmly in place and that the telephone’s receiver cord is on the LEFT side of the TTY
- Check the telephone indicator light; if it is lit, you have the line
- Dial the number and watch the telephone light; if it is flashing slowly, this indicates that the device on the other end is ringing
- When the person you are calling answers, you will see a phrase appear on the screen such as: “Hello, Richard Smith here, GA.” The “GA” stands for “Go Ahead”. Don’t forget to use it whenever you have finished speaking, so the other person will know it’s his or her turn to speak. The person who receives the call is always the one who starts typing first



- When the call is over and you want to advise the other person that you are ready to get off the phone, type "SK". It means Stop Keying. The other person will respond by typing "SK" if he or she agrees that the call is completed. To be courteous, each person waits until the other one has indicated "SK" before hanging up the phone. Always switch the TTY "OFF" as soon as you have finished the call.

#### How to make a call using the Relay System

- Phone the number (1-800-855-0511) and tell the operator your name, the name of the person you are calling and the number you wish to reach.
- The operator will make the call for you and you speak to the operator as if you were talking directly to the person you are calling. For example, say "Hi, how are you doing?" Do not say: "Tell him I said hello." Remember to say "Go Ahead" when you finish speaking, so the person on the other end will know it is his or her turn to speak.
- If you normally speak very quickly, the operator may ask you to speak slower so your message can be typed. There will be brief silences as the operator types to the TTY user and the user replies.
- Operators will not betray confidences.



**APPENDIX D**

**Sample Notices of Disruption of Service**

**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 \_\_\_\_\_ at (phone number).

Thank you.  
Principal

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**Sample 2 – Accessible Washroom**

To: Visitors to the Education Centre

Our accessible 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 at 123 Main Street, which is located next door to our premises. We apologize for this inconvenience.

Thank you.  
Manager of Facility Services