ACCESSIBILITY POLICY
INTEGRATED ACCESSIBILITY STANDARDS
ACCESSIBILITY NOTICES

Statement of Commitment

Paul Penna DJDS (the "School") is committed to meeting the accessibility needs of people with disabilities – including students, employees, and community members – in a timely manner. The School will continue to improve accessibility to persons with disabilities in its facilities, its policies and processes. The School will further these goals by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA"). In that regard, the School has established this accessibility policy (the "Policy") and an Accessibility Standards for Customer Service Policy to meet its obligations under Regulation 191/11, "Integrated Accessibility Standards" (the "Regulation") under the AODA.

The School's vision for accessibility is that people with disabilities, visible or invisible, are given the same opportunity as others to obtain and benefit from services offered by the School. The School's goal is to make reasonable efforts to provide services in such a way that the key principles of independence, dignity, integration and equality of opportunity for persons with disabilities are respected.

The School welcomes and encourages all members of our community to collaborate and provide creative input in future initiatives for accessibility.

Application

This Policy applies to all employees, volunteers and agents of the School who interact with our school community, including current and prospective students, employees, volunteers, families, alumnae, donors, and any other users of the School's goods and services. This Policy is available to the public and will be provided in an accessible format upon request.

Definitions

Below is a list of definitions in alphabetical order used in this policy, as set out in the Regulation:

Accessible Formats may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Communications means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

Communication Supports may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Information includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Redeployment means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

Unconvertible means if it is not technically feasible to convert the information or communications. It also means if the technology to convert the information or communications is not readily available.

Multi-year Accessibility Plan

The School is not currently required to develop a multi-year accessibility plan, as it does not have 50 employees in Ontario at this time. If the School reaches the threshold of 50 employees in Ontario, it will develop a multi-year accessibility plan in accordance with the Regulation.

OR

The School's Multi-Year Accessibility Plan outlines the School's strategies for preventing and removing barriers and meeting its requirements under the Regulation. The School will post the plan on its website and will provide it in an accessible format upon request. The plan will be reviewed and updated at least once every five years.

Training

The School will ensure that training is provided as required by the Regulation to all employees and volunteers, and all persons who participate in developing the School's policies, on the requirements of the accessibility standards referred to in the Regulation and in respect of the *Human Rights Code* as it pertains to persons with disabilities. Training will be provided as soon as practicable. If any changes are made to this Policy or the requirements, training will be provided to include those changes. The School will ensure that others that provide goods, services or facilities on behalf of the School have had training.

Information and Communications Standard

Feedback Processes

The School will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and with communication supports upon request. The School will notify the public about the availability of accessible formats and communication supports.

Accessible Formats and Communication Supports

The School will, upon request, provide or arrange for accessible formats and communication supports for persons with disabilities in accordance with the Regulation as follows:

i. In a timely manner that takes into account the person's accessibility needs due to a disability;
ii. At a cost that is no more than the regular cost charged to other persons; and
iii. In consultation with the person making the request to determine suitability of an accessible format or communication support.

The School will notify the public about the availability of accessible formats and communication supports.

Unconvertible Information or Communications

If the School determines that information or communications are unconvertible, the School will provide the person requesting the information or communication with,

(a) an explanation as to why the information or communications are unconvertible; and
(b) summary of the unconvertible information or communications.

Information or communications are unconvertible if,

(a) it is not technically feasible to convert the information or communications; or
(b) the technology to convert the information or communications is not readily available.

Emergency Information

If the School prepares emergency procedures, plans or public safety information and makes the information available to the public, the School will provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Website Accessibility

The website accessibility requirements in the Regulation apply to the School if it reaches the threshold of 50 employees in Ontario. Where practicable, and to the extent required by the Regulation, the School will make any new internet website and web content on those sites conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. If the School reaches the 50 employee threshold, by January 1, 2021 all internet website and web content backdated to 2012 will conform with WCAG 2.0 Level AA.

Educational and Training Resources and Materials

By October 31,2022 and if notification of need is given, the School will provide educational or training resources or materials in an accessible format that takes into account the accessibility needs of the person with a disability to whom the materials are being provided by:

a. Procuring through purchase or obtaining by other means an accessible or conversion ready electronic format, where available, or
b. Arrange for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources of materials cannot be procured.

The School shall provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities.

Training to Educators

By December 1, 2022 the School shall provide educators (those involved in program or course design delivery and instruction) with accessibility awareness training related to accessible program course delivery and instruction. The School will keep a record of training, including dates will be provided and the number of individuals to whom it is provided.

Libraries

The libraries of the School will provide, procure, or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request. Print materials will be available by [*Date*]. Digital or multimedia resources will be available by [*Date*].

Exception from the above requirements will be special collections, archival materials, rare books and donations.

AODA Employment Standards

The School will comply with the requirements of the Employment Standards in the Regulation. The Employment Standards apply in respect of employees, and not volunteers or other non-paid individuals.

Recruitment

The School will notify employees and the public about the availability of accommodations for applicants and employees with disabilities as follows:

i. In its recruitment processes;

ii. During the recruitment process, when job applicants are individually selected to participate in an assessment or selection process;
iii. If a selected applicant requests an accommodation, the School will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability; and
iv. When making offers of employment to a successful applicant. The successful applicant will also be notified of the School's policies for accommodating employees with disabilities.

If a selected applicant requests an accommodation, the School will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Employee Notification

The School shall inform its employees of its policies used to support employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. Such information will be provided as follows:

i. To new employees as soon as practicable after they begin their employment;
ii. To existing employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

Accessible Formats and Communication Supports

Upon request by an employee with a disability, the School will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

i. Information that is needed in order to perform the employee's job; and
ii. Information that is generally available to employees in the workplace.

The School will consult with the employee making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plans (IAP)

The School will develop and have in place a written process for developing a documented individual accommodation plan for employees with a disability. The process will include the following elements:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
5. The steps taken to protect the privacy of the employee's personal information.
6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Return to Work

The School will have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes shall be documented and must outline the steps that the School will take to facilitate the return to work and include an individual accommodation plan.

Performance Management, Career Development and Advancement and Redeployment

Performance management processes related to assessing and improving employee performance, productivity and effectiveness will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans.

The School will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development and advancement to its employees. Career development and advancement includes providing additional responsibilities within an employee's current position, the movement of an employee from one

job to another which may provide greater responsibility and/or compensation, and/or which places the employee at a higher level in the School, or any combination of these.

If the School needs to reassign employees to other departments or jobs within the School as a result of job elimination, the School will take into account the accessibility needs of employees with disabilities as well as individual accommodation plans.

Workplace Emergency Response Information

The School will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the School is aware of the need for accommodation due to the employee's disability. If the employee who receives individual workplace emergency response information requires assistance, and with the employee's consent, the School shall provide the workplace emergency information to a person designated by the School to provide assistance to the employee.

This will be done as soon as practicable after the School becomes aware of the need for accommodation due to the employee's disability.

The School will review the individualized workplace emergency response information when the employee moves to a different location in the School, when overall accommodations needs or plans are reviewed and when the School reviews its general emergency response policies.

Design of Public Spaces

The School will meet the Accessibility Standards for the Design of Public Spaces when building or redeveloping public spaces. Public spaces include, but are not limited to, outdoor public eating areas, outdoor paths of travel, accessible off street parking and service-related elements such as counters and waiting areas.

If the School has accessible elements in public spaces, it will develop procedures for preventative and emergency maintenance of those accessible elements, as required by the Regulation. The School will also develop procedures for dealing with temporary disruptions of accessible elements as required by the Regulation, should the School ever have accessible elements in the future.

Posting/Availability

This Policy is available to the public and will be provided in an accessible format upon request.

Questions

If anyone has questions about this Policy or accessibility plan, or requires this information in an accessible format, please contact the Head of School or the Operations Manager.

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

Paul Penna DJDS (the "School") is committed to the principles and goals of the *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA") and the Customer Service Standards set out in the *Integrated Accessibility Standards Regulation* ("Customer Service Standards"). The School is committed to providing excellent customer service in a manner that, as much as reasonably possible, respects an individual's dignity, independence, integration and equality of opportunity, including for those with disabilities.

Purpose

The purpose of this Policy is to outline the practices and procedures approved by the School in order to meet its obligations under the AODA and specifically, the Customer Service Standards. The School, through this policy, establishes and implements practices and procedures consistent with its goal of compliance, as well as its commitment to excellent customer service for all.

Guiding Principles and Scope of Policy

The School is committed to excellence in serving all customers, including persons with disabilities, and will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

a) The School's goods, services and facilities are provided in a manner that respects the dignity and independence of persons with disabilities;
b) The provision of the School's goods, services and facilities to persons with disabilities and others are integrated to the extent possible, unless an alternate measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services and facilities;
c) Persons with disabilities are given an opportunity equal to that given to others to obtain, use or benefit from the School's goods, services and facilities; and

d) The School communicates with persons with disabilities in a manner that takes into account their disabilities.

To ensure the best possible customer service, the School encourages open two-way communication and expects persons with disabilities to communicate their need for accommodation or assistance if it is not readily apparent how that need can be met.

Application

This Policy applies to all employees, volunteers and agents of the School who interact with our customers, including current and prospective students, current, prospective and past parents/grandparents, alumnae, donors and other users of our goods and services. It also applies to every person who participates in developing the School's policies, practices and procedures governing the provision of goods or services to the public, and every other person who deals with members of the public or other third parties on behalf of the School.

Definitions

Assistive Device: Any device used by people with disabilities to help increase, maintain or improve how a person with a disability can function. Such devices may include, but are not limited to, wheelchairs, walkers, white canes, oxygen tanks, electronic communication devices, elevators, ramps, stair lift, etc.

Customer: Any person who uses the goods and services of the school, including students, parents and other members of the school community.

Disability: As defined in the *Accessibility for Ontarians with Disabilities Act, 2005*, section 2, means (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness; (b) a condition of mental impairment or developmental disability; (c) a learning disability or a dysfunction on 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*.

Dignity: Refers to service which is provided in a way that allows the person with a disability to maintain self-respect and the respect of others.

Equal Opportunity: Refers to service which is provided in a way that allows the person with a disability access to goods and service at the same level given to others.

Independence: Allows the person with a disability to do things on their own without unnecessary interference from others.

Integration: Refers to service which is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar manner as other customers, unless an alternate measure is necessary to enable the person with the disability to access the goods or services.

Service Animal: An animal is a service animal for a person with a disability if it is readily apparent that the animal is used by the person for reasons relating to help with his or her disability; or if the person provides a letter from a doctor or nurse confirming that the person needs the animal to help with his or her disability.

Support Person: A person who assists a person with a disability with communication, mobility, personal care or medical needs as they access the services of the school. A support person is distinct from an employee who supports a student in the system.

Communication, Support Persons, Service Animals, Assistive Devices, and Billing

The School is committed to communicating with persons with disabilities in ways that take into account the person's disability. The School will work with persons with disabilities to provide alternative communication formats that will meet their needs as promptly as feasible, to provide information to customers in an alternative format that will meet their needs in a timely fashion, and, if telephone or other used forms or communication are not suitable for a customer's needs, to provide alternative forms of communication, to the extent required by law.

The School is committed to providing fully accessible telephone service to all customers. The School will train its staff and volunteers to communicate over the telephone in plain language and to speak clearly.

People with disabilities may use their own personal assistive devices, service animals (as defined by the Customer Service Standards) or be accompanied by support persons (as defined by the Customer Service Standards) while obtaining any service provided by the School. Service animals are permitted on the parts of our premises that are open to the public, unless excluded by law.

The School may require a person with a disability to be accompanied by a support person, but only if, after consulting with the person with a disability and considering the available information, the School determines that the support person is necessary to protect the health and safety of the person with the disability or of others on the premises, and there is no other reasonable way to protect the health or safety of the person with the disability or others on the premises.

The School is committed to providing accessible invoices. For this reason, invoices will be provided in alternative formats, upon request.

Training

The School will ensure that the following persons receive training about the provision of goods, services and facilities to persons with disabilities: all of the School's employees and volunteers, every other person who deals with members of the public or other third parties on behalf of the School, and every person who participates in developing the School's policies, practices, and procedures governing the provision of goods, services or facilities to members of the public or other third parties. Training will be provided to School teachers and staff as part of orientation training. Training will also be provided on an ongoing basis in connection with changes to the policies and procedures governing the provision of goods and services to persons with disabilities.

The training will include instruction on:

- The purposes of the AODA and the requirements of the Customer Service Standards;
- How to interact and communicate with people with various types of disabilities;
- How to interact with persons with disabilities who use an assistive device or the assistance of a guide dog or other service animal or the assistance of a support person;
- How to use equipment or devices available on the School's premises or otherwise provided by the School that may help with the provision of the School's goods or services to a person with a disability;
- What to do if a person with a particular type of disability is having difficulty accessing the School's goods, services or facilities; and
- The School's current policies, practices and procedures relating to the Customer Service Standards and providing goods or services to persons with disabilities.

To the extent required by the Customer Service Standards, the School will keep records of the training provided, including dates on which training is provided and the number of individuals in attendance.

Notice of Temporary Disruptions

The School will provide public notice in the event of a planned or unexpected disruption to services for or facilities used by persons with disabilities. Such notices will include information about the reason for the disruption, how long the disruption is expected to last, and a description of any alternative services or facilities, if available.

Such notice will be placed or available in a location that is appropriate based on the service disruption. For instance, if the elevators are out of order, the School will ensure a notice is posted on or near the elevator doors.

In order to make information accessible, the signs and printed notices of sufficient size that are easily readable will be prepared.

The signs and printed notices will be displayed prominently at the entrance to the School, on notice-boards and at service desks.

Telephone messages will be left in clear and concise language.

Feedback Process

The School welcomes feedback, including feedback about the delivery of services to persons with disabilities. Users can submit feedback to the Head of School. Alternatively, users can submit feedback to any member of school administration, and it will be forwarded to the appropriate person.

Feedback regarding the way the School provides goods and services to persons with disabilities and feedback about the feedback process itself can be made through the website, by telephone, through email, or by other means as required.

Where possible, concerns or complaints will be addressed immediately. However, some concerns may require more time and consideration. The School will endeavor to respond promptly, either with details on the resolution of the concern or, in more complex cases, on the steps being taken by the School to resolve the concern.

Information regarding the School's feedback process can be found on the School's website.

The School will provide or arrange for accessible formats or communication supports to ensure the feedback process is accessible to persons with disabilities, upon request.

Availability of Documents

This Policy incorporates all of the document requirements under the Customer Service Standards, and is available upon request. When a request is made for this Policy by a person with a disability, the School will provide the document or the information contained in the document in a format that takes into account the person's disability.

ACCESSIBILITY NOTICES

Paul Penna DJDS (the "School") is committed to meeting the accessibility needs of people with disabilities in a timely manner and meeting the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005*.

Availability of Accessibility Documents

The School's Accessibility Policy and Accessibility Standards for Customer Service Policy (including the School's policies on the use of service animals and support persons, temporary disruptions, feedback and customer service training) are publicly available for review, upon request.

Availability and Format of Documents

The School will, upon request, provide or arrange for accessible formats and communication supports for persons with disabilities, in a timely manner that takes into account the person's accessibility needs due to a disability, at no additional cost. The School will consult with a person making such a request to determine their accessibility needs and the appropriate supports or formats.

Feedback Process

The School provides customers with the opportunity to communicate feedback on service provided to persons with disabilities. The School's feedback processes can be accessed with accessible formats and communication supports, upon request.

Accommodations in Recruitment

Accommodations are available for applicants with disabilities in the School's recruitment processes.

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