



Accessibility Policy – Integrated Accessibility Standards

Statement of Commitment

TMS (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 exist in any format, including text, audio, digital or images, and that convey 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 it is not technically feasible to convert the information or communications. It also means the technology to convert the information or communications is not readily available.

Multi-year Accessibility Plan

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:

- In a timely manner that takes into account the person's accessibility needs due to a disability;
- At a cost that is no more than the regular cost charged to other persons; and
- 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,

- an explanation as to why the information or communications are unconvertible; and
- a summary of the unconvertible information or communications. Information or communications are unconvertible if,
- it is not technically feasible to convert the information or communications; or
- 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

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 at Level AA.

Educational and Training Resources and Materials

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:

- Procuring through purchase or obtaining by other means an accessible or conversion ready electronic format, where available, or
- Arrange for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources or 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

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. 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:

- In its recruitment processes;
- During the recruitment process, when job applicants are individually selected to participate in an assessment or selection process;



- 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
- 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:

- To new employees as soon as practicable after they begin their employment;
- 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:

- Information that is needed in order to perform the employee's job; and
- 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 about this policy

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by:

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