



Accessibility Policy for Disabled Persons

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DECLARATION OF ENGAGEMENT

The Lycée Français of Toronto (LFT) wishes to offer its students, parents, personnel and the public a respectful environment in which the personal autonomy and dignity of all are fostered.

In keeping with the Ontario Regulation 429/7 regarding Accessibility Norms in client services, and the Integrated Accessibility Standards, Ontario Regulation 191/11, which fall under the 2005 law regarding Accessibility for Disabled Persons in Ontario, the LFT facilitates access to its offices and classrooms. The LFT is committed to doing all that is possible to ensure that it is accessible to disabled persons, whether their disabilities are visible or non-visible, in the same way that it is accessible to all other persons, including in its services clear measures that facilitate the use of special equipment or accessories as well as the use of guide animals.

Special training for all personnel is mandatory in order to ensure that our staff is sensitized to the needs of those living with disability.

The LFT is always open to comments from the public regarding our accessibility. The contact address is accessibilite@lft.ca.

References

Ontario Regulation 429/7, *Accessibility Norms in client services, and Integrated Accessibility Standards, Ontario Regulation 191/11*, taken in application of the *2005 Law for Accessibility for Disabled Persons in Ontario*

Application

The present policy applies to all permanent and temporary staff at LFT, to job applicants, to interim workers, volunteers, and to exterior professionals including speech therapists, occupational therapists, club and camp teachers, food services staff, cleaning staff... etc.

Principles

Disabled persons, including job applicants and staff, must be given the opportunity to benefit from services at LFT in such a way that:

- Is entirely non-discriminatory
- Ensures that the principles of dignity and autonomy are respected
- Ensures that the services are integral
- Ensures that these persons may enjoy the same possibilities and opportunities as the others in terms of obtaining and using services

General Norms

The LFT is a private sector organization in terms of the Law for Accessibility for Disabled Persons in Ontario and engages itself to respond to the needs of those living with disability.

Policy

- 1.** The LFT is engaged in making all reasonable efforts to ensure that its policies, procedures and practices are in conformity to the principles of independence, dignity, inclusion and equality of opportunity for all, in particular for those living with disability, whether it be visible or non-visible.
- 2.** The LFT wishes to welcome all members of the school community and general public, and to ensure that its staff and workers provide services that respects the independence and dignity of those living with disability and through including in its services measures that allow for the use of special equipment and accessories and the recourse to guide animals.
- 3.** In order to increase the knowledge of the special needs of disabled persons and to sensitize its staff to these needs, the LFT is responsible for offering adequate training to all employees as well as to third parties who act in its name and who are in contact with the public. When new employees or third parties are hired, this training will be offered to them within a reasonable timeframe.
- 4.** The LFT is required to see that its policies related to the *2005 Law for Accessibility for Disabled Persons in Ontario* are available to the public and that the manner in which those living with disability are invited to communicate with the LFT regarding these policies is adapted to all eventual special needs.
- 5.** In order to manage the efficiency of the engagement of the Accessibility policy for those living with disability, the LFT will establish a process allowing it to receive commentary from those involved or interested parties and to respond to these observations. It will render information regarding this process easily accessible to the public, and permit individuals to communicate their observations via diverse channels.
- 6.** In order that the present policy may be observed efficiently and economically, the LFT, and those persons in a position of responsibility who are charged with the mission of planning new initiatives, creating new systems or purchasing new material will consider the incidence of these measures on those living with disability.
- 7.** The LFT will create a retroaction procedure relative to the engagement of this present policy.

References

2005 Law for Accessibility for Disabled Persons in Ontario
Ontario Regulation 429/7, *Accessibility Norms for client services*
Integrated Accessibility Standards, Ontario Regulation 191/11
Human Rights Code of Ontario

RESPONSIBILITIES

The LFT wishes to welcome all members of the school community and general community, and to ensure that its staff and workers provide services that respects the independence and dignity of those living with disability and through including in its services measures that allow for the use of special equipment and accessories and the recourse to guide animals. The school direction or a designated person will ensure that all personnel and third party employees undergo accessibility training.

Training will be provided to new staff, volunteers, agents and/or contractor who deal with the public or act on our behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Training

The training will include:

- The objectives of the *2005 Law for Accessibility for Disabled Persons in Ontario* and the requirements of the Accessibility Norms for client services (Ontario Regulation 429/7) and Integrated Accessibility Standards, Ontario Regulation 191/11, as well as direction on the following points:
- How to interact and communicate with disabled persons living with a diversity of disabilities;
- How to interact with disabled persons using special equipment or accessories or who require a guide dog or other guide animal or personal support worker;
- How to interact with the parents or guardians and members of the public who could use special equipment or accessories when accessing services at LFT
- The requirements relative to the Accessibility Norms integrated from the 2005 Law (and associated Regulations), as well as the disposition of the Human Rights Code which applies to disabled persons
- Instructions on what to do if a person with a disability has applied for a job and is interviewing with LFT
- Instructions on what to do when making decisions on career development and advancement with a person with a disability
- Instructions on accommodation plans for a person with a disability

In accordance with the regulatory requirements, the LFT ensures that all members of the staff, volunteers, and third parties receive this training. The LFT ensures that all persons offering services, goods or installations receive this training. The training is pertinent and adequate to the

functions of the personnel and third parties and all those who receive it. It will occur as soon as possible.

Record of Training

LFT will keep a record of training that includes the dates training was provided and who completed the training.

Retroaction (Providing Feedback)

The direction of LFT or a designated person must establish a process of retroaction by which it may receive the observations of those interested in the subject of its accessibility, transmit these observations to the management of LFT and/or those responsible, and to respond, to file and to treat all requests. These observations should be made in person, by telephone, by mail or by e-mail to the following address: accessibilité@lft.ca or accessibility@lft.ca

Confidentiality

If a disabled person is the parent or guardian of a student and is accompanied by a personal support worker who will help them in a discussion that will relay confidential information about the student, the member of the staff must first obtain the consent of the parent or guardian for the divulgence of such information. The persons for whom their profession includes this notion of confidentiality in their professional code are exempted from signing the consent form.

The consent to the divulgence of confidential information in the presence of a personal support worker must be given in writing by the parent or guardian of the student or adult.

The personal support worker must as well give the assurance through writing that he or she guarantees that all information pertaining to the discussion will remain confidential. A copy of the signed consent document is kept in the LFT offices. If the parent or guardian invites a different personal support worker for later meetings, a new consent form must be filled. An example of a consent form is given in the Annex A of the present administrative directives.

DEFINITIONS

Adaptation/Accommodation

- Manner in which the LFT makes reasonable efforts to prevent or eliminate obstacles that stop disabled persons from participating fully in the services it offers.

Guide animal

- A guide animal is an animal that a person uses to mitigate the difficulties presented by their disability whether it be in an obvious, evident manner or not (supported by a doctors' or nurses' letter).

For example, a guide dog used by a blind person, or an animal trained to help someone deaf or hard of hearing, or an animal trained to sense a coming epileptic seizure and to bring the person to a safe space. The norm for these services regarding disabled persons applies as well to the animals who furnish other services to those with disabilities.

For example, an animal may be easily identifiable as a guide animal if it wears a harness or panniers indicating it is a guide animal or if it has a certificate or ID card from a training school for assistance animals, or an ID card from the Prosecutor General of Ontario. It is also the case if the person uses the animal to help him or her accomplish tasks like opening doors or moving objects.

If it is not readily apparent that the animal is being used by the person, including job applicants and staff, for reasons relating to his or her disability, LFT may request verification.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

Special equipment or accessory

Special equipment or accessories used by disabled persons help facilitate their daily lives. Some examples include wheelchairs, walkers, canes, oxygen tanks or an electronic communication device.

The training offered by LFT focuses on the interactions with users of such equipment or accessories as opposed to their technical aspects.

Particular procedures apply to students and members of staff who use such equipment or accessories.

Public space

- Space within the LFT in which the services may be offered to members of the public.

Disability

The definition of the word disability is taken from the internet page of the Government of Ontario.

- Any degree of physical incapacity, infirmity, malformation or disfigurement due to bodily lesion, congenital anomaly or sickness, and notably, diabetes, epilepsy, cranial trauma, any degree of paralysis, amputation, muscular incoordination, blindness or visual deficiency, deafness or audial deficiency, muteness or speech difficulties, or the necessity of recourse to a

guide dog or other animal, to a wheelchair or to any other piece of special equipment or accessory;

- Intellectual deficiency or developmental issues;
- Learning difficulties or cognitive dysfunction causing difficulty in comprehension or use of symbols or of spoken language;
- Mental health issues.

Obstacle

- Anything that may stop a disabled person from participating fully in all aspects of the services offered by LFT due to their disability. In particular, physical obstacles, architectural obstacles or behavioural or technological obstacles.

Personal Support Worker

A personal support worker is a person who helps a disabled person or serves them as interpreter while this person receives services from the LFT. An employee who helps a student within the school system is not a personal support worker: particular and distinct procedures apply in this case.

A personal support worker is someone who a disabled person chooses to serve them or help them communicate or move around, receive personal care or medical care and to have access to goods and services. Personal care offered by personal support workers includes notably the work of moving a disabled person physically from one place to the next or helping this person to eat or use the toilet. The medical care offered by personal support workers include managing and surveilling the health of the disabled person or offering medical support and care in the case of an emergency.

A personal support worker may be a paid professional, a volunteer, a friend or a member of the family.

Accessible restroom

- A restroom arranged in such a way that responds to the needs of those with physical disabilities.

Management and retroaction of accessibility for disabled persons

- Procedure by which the LFT hears the complaints and observations of those concerned regarding the accessibility of services for those with disabilities and responds to these commentaries.

FOR DISABLED PERSONS

Use of a guide animal

Any person living with disability, including a job applicant, who is accompanied by a guide animal is welcomed at LFT with this animal and may keep the animal with him or her. This access is in conformity with regulations regarding security.

This requirement applies uniquely to those areas within the school to which the public and third parties regularly have access.

The present procedure concerns uniquely the rights of persons living with disability who are accompanied by a guide animal.

Non-access to the assistance of a guide animal

The access to the assistance of a guide animal can be forbidden if this animal is of a race forbidden by a law. The *Law on Responsibility of dog owners* imposes restrictions in the case of Pit-bulls.

The access to areas within the school may be forbidden to a guide animal only when this is required by a different law, for example the *2001 Law on food quality and sanitation* or *Law on the protection and the promotion of health*. This latter law in particular stipulates that animals are not allowed in areas where food is prepared or handled (ex. in a cafeteria kitchen or in a culinary arts classroom), but it provides an exemption for guide dogs, allowing them to be present where food is normally served or sold (ex. in a cafeteria or dining area).

Should there be a risk to the health or safety of another individual due to the presence of the guide animal, all possible options must be analyzed before excluding the guide animal. For example, this would be the case if someone should be gravely allergic to a guide animal. The LFT would be responsible for analyzing all points of the situation in order to eliminate all health and safety risks, such as creating a distance between the two persons involved or to rearrange scheduling if possible.

If the animal is not a trained guide dog, and it is not fully evident that the animal is in fact a guide animal, a member of the school personnel may ask the person using the animal for a doctor's letter confirming that the animal is necessary due to disability. The letter is not required to indicate the disability, nor why the animal is necessary and how the person uses it.

If the person using the animal is regularly present at LFT, the direction of LFT may request to keep a copy of the letter, but only for as long as is necessary. The direction of the school or the management of the service must protect the confidentiality of the letter and the information it contains.

In the rare cases where an assistance animal must be excluded, the LFT must use all resources and means possible to offer to the disabled person the services they require. It may mean that the

LFT will ensure a safe space to keep the animal if the law permits, and to discuss the best ways to help and assist the disabled person with him or her. For example, a person with a visual disability might need the assistance of someone (a member of staff or a volunteer) to guide them.

Personal support workers

- Any disabled person, including a job applicant, who is accompanied by a personal support worker will be welcomed at LFT. The access will be in conformity with regular security protocol. This requirement applies uniquely to the areas regularly accessible to the public and third parties.

Right to participate in school activities

- Concerning activities to which a right of entry is perceived, the LFT must ensure to inform those concerned that any personal support worker accompanying a disabled person is welcome free of charge.

LFT's Right to require the presence of a personal support worker

The LFT may require that a personal support worker accompany a disabled person while they are present at the school, but only if the presence of a personal support worker is necessary to protect the health or safety of the disabled person or others in the environs. This would be a very rare case that would occur only if, after consultation with the disabled person, the requirement of the presence of a personal support worker is the only way to ensure that the disabled person is safe and, at the same token, to ensure that LFT lives up to its obligation to protect the health and safety of the person with a disability or other people in the environs.

Disabled persons are free to accept the reasonable risk of injury, exactly as others are. Different people will have varying degrees of tolerance regarding risk. One must make an effort to balance the risk with the potential advantage for the disabled person. It is not sufficient that the personal support worker helps to protect the health and safety in order to require their presence; their presence must be necessary or essential in order to protect health and safety - in other words, the risk must not be able to be eliminated or diminished via other means. Any decision concerning the protection of the health and safety of disabled persons must be founded on precise and specific elements and not on suppositions. The simple fact that someone is disabled does not signify that this person is incapable to satisfy the requirements of the institution regarding health and safety.

Use of special equipment or accessories for disabled persons

The LFT welcomes disabled persons, including a job applicant, using special equipment or accessories and invites them to ask for help if needed from members of staff and volunteers. Information regarding the interactions with personnel using special equipment or accessories may be provided upon request to those interested.

Management and retroaction regarding accessibility services for disabled persons

Notice of Availability and Format of Documents

LFT will notify the public, including internal and external job applicants and staff, that the policies and documents related to *Integrated Accessibility Standards, Ontario Regulation 191/11* are available upon request and in a format that takes into account the customer's disability.

For recruitment, the notice of availability and format of documents may be stated in the job posting. Further, internal and external job applicants will be notified throughout the interview process that accommodations are available upon request and that LFT will consult with the candidate to provide suitable accommodations as needed. LFT will also ensure that all newly hired and current staff will be provided a copy of this policy and if there is a change to the policy, it will be communicated as soon as possible to everyone.

It is LFT's goal to ensure that everyone, including internal and external job applicants and staff, are aware of the disability policies to support them through all aspects of interaction with LFT, including general interactions, recruitment, career development and advancement.

Notification will be given by posting the information in a conspicuous place owned and operated by LFT, LFT's website and/or any other reasonable method.

Retroactive methods (Providing Feedback)

Diverse methods may be utilized to request retroaction, in order to ensure that disabled persons have optimal access to the retroactive process. Observations and complaints may be transmitted verbally, by mail, by e-mail or through a suggestion box or through comment cards.

Submitting Feedback:

Members of the public, job applicants and staff can submit feedback to:

- Employee Name and/or Position Title
- Phone Number
- Mailing Address
- accessibilité@lft.ca or accessibility@lft.ca

Member of the public, including internal and external job applicants and staff, that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Proactive measures regarding accessibility services for disabled persons (Accommodation)

In order to ensure that the accessibility policy for disabled persons is observed in an efficient and economical manner, the LFT, those in positions of responsibility and management, the Administrative Council, will take into account the consequences of their decisions for disabled

persons when planning new initiatives, when creating new systems or when purchasing new material.

LFT will keep a written accommodation plan for employees with disabilities, and will keep a Return-to-Work process and plan for any employee away from work due to disability.

LFT will consider the accessibility needs of all employees in the Performance Management process. LFT commits to reviewing individual accommodation plans as part of the Performance Management process, having documents in accessible formats for employees with disabilities, and providing informal and formal coaching, as needed, in a manner that takes disability into account.

LFT will also consider accommodations and individual accommodation plans when making career development and advancement decisions to help an employee with a disability succeed in their new responsibilities.

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of LFT. In the event of any temporary disruptions to facilities or services that the public, including internal and external job applicants and staff, with disabilities rely on to access LFT, efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will Include:

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

Notifications Options:

When disruptions occur, LFT will provide notice by, for example:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the LFT website;
- contacting anyone with appointments;
- verbally notifying individuals when they are making an appointment; or
- by any other method that may be reasonable under the circumstances.

Administration

If you have any questions or concerns about this policy or its related procedures please contact:

- accessibilité@lft.ca or accessibility@lft.ca

Acknowledgement & Agreement

I, _____, acknowledge that I have read and understand the Accessibility Policy for Disabled Persons, LFT. Further, I agree to adhere to this Policy and will ensure that staff working under my direction (if applicable) adhere to these guiding principles. I understand that if I violate this Policy, I may face corrective action, up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Witness: _____