**Conestoga Students Incorporated**

**Accessibility Policies and Procedures Manual**

Revised June 2021

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# Integrated Accessibility Policy

Conestoga Students Incorporated (CSI) strives at all times to provide services and opportunities in a way that respects the independence, dignity, integration, and equality of opportunity of persons with disabilities. The principles of accessibility applies to and must be demonstrated by all our Board of Directors, Customers, Employees, Volunteers, and third-party contractors.

## Statement of Commitment

Conestoga Students Incorporated (CSI) is committed to providing goods, services and employment in an integrated and accessible manner that respects the dignity and independence of persons with disabilities. We are committed to meeting these needs to ensure barriers are removed and prevented in a timely manner.

# General Requirements

## Policy

1. CSI will provide copies of our integrated accessibility policies upon request, and will ensure that the format is accessible for customers.
2. CSI will ensure that all our events and service areas are accessible to our customers and meets a consistently high standard of quality.
3. CSI will ensure that customers are provided with an appropriate and accessible feedback mechanism, and have the ability to contact CSI regarding concerns with the accessibility of our goods, services, and/or employment. We take customer feedback seriously, and will work to address comments, suggestions, and concerns. CSI will acknowledge the receipt of feedback in an appropriate manner.
4. CSI will only collect and use customer information in a lawful manner that protects the privacy of our customers and is compliant with applicable legislation including the Privacy Act and the Personal Information Protection and Electronics Documents Act. (PIPEDA).
5. CSI shall ensure that our facilities, products, and services are accessible to persons with disabilities. All customer service provided by CSI shall follow the ideals of dignity, independence, integration and equal opportunity. We will meet or exceed all applicable legislation regarding the provision of customer service.
6. CSI staff members shall provide service in a professional, polite and helpful manner, while ensuring that all interactions are conducted with integrity, discretion and respect.
7. CSI staff shall be provided with appropriate customer service training to ensure the consistent delivery of exceptional service to all customers, including people with disabilities.
8. CSI will ensure that the following items are available to the public on the CSI website:
   * Our integrated accessibility policies
   * The availability and process for our accessibility feedback mechanism

## Procurement of Goods, Services, Facilities and Kiosks

When procuring goods, services, self-service kiosks or facilities, CSI shall incorporate accessibility criteria and features, unless it is not feasible (practicable). If not practicable, CSI shall provide an explanation, upon request.

# Accessible Customer Service Policy

## Accessible Customer Service Standard

* Communication with Persons with Disabilities
* Notice of Disruption in Services
* Assistive Devices
* Service Animals
* Support Persons
* Feedback
* Staff Training

## Communication with Persons with Disabilities

When communicating with a person with a disability, CSI will do so in a manner that considers the person's disability. CSI commits to providing all current and incoming staff and volunteers with training on customer service. This training will include how to interact and communicate with persons with various types of disabilities.

## Notice of Disruption in Services

### Objective

The objectives of this policy are to:

* Outline where a notice of disruption will be posted and what information must be included.
* Describe the process of providing notice of an expected, planned service disruption.
* Describe the process of providing notice of an unexpected service disruption.

### Procedure

From time to time there may be disruptions that render access to a service, technology, or area temporarily unavailable. If such a disruption in service is planned and expected, CSI will provide the public with reasonable notice of at least ten (10) business days in advance, or as soon as possible if less than ten (10) business days. If such a disruption is unplanned and unexpected, CSI will provide the public with notice as soon as possible.

In the event of any disruption in services, CSI will take reasonable steps to provide notice to the public through appropriate information channels. Such channels include, but are not limited to:

* CSI's website;
* CSI’s social media channels;
* Physical postings, such as on the front door at all CSI office location entrances; and/or
* Communication via email or phone call to affected individuals.

Notice of a temporary disruption may include the following information, as required:

* The time, date and location of the disruption;
* Information about the reason for the disruption;
* Anticipated duration of the disruption; and
* Descriptions of alternative facilities or services, if any.

## Assistive Devices

Personal assistive devices are permitted in all CSI offices and event facilities except when subject to operator safety. CSI will train its current and incoming employees, volunteers and independent contractors on the use of various assistive devices as required. It should be noted that the provision, use and safety of personal assistive devices is the responsibility of the person with a disability.

## Service Animals

CSI is committed to welcoming people with disabilities who are accompanied by a service animal. CSI staff and volunteers are properly trained in how to interact with people with disabilities who are accompanied by a service animal. If it is not readily apparent that an animal is a service animal, a CSI representative may ask the person with the service animal to provide verification of the animal's duty. The use, safety and cleanup of the service animal is the responsibility of the person with a disability.

If a person with a disability is accompanied by a service animal, CSI shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with them, unless the animal is otherwise excluded by law from the premises. If a service animal is excluded by law from the premises, CSI shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider’s goods, services or facilities.

## Support Persons

CSI welcomes customers who are accompanied by a support person, when the support person has been hired or chosen by the person with a disability.

Support persons shall be permitted entry to all CSI facilities and meeting rooms that are open to the public. Where there are admission fees for an event or training session organized by CSI, persons with a disability shall be expected to pay the same fee as other attendees, but no admission fee shall be charged to their support person.

Please note that Support Persons will not receive certification or documentation of course completion for although they have attended a training session, they are not considered an active participant.

## Feedback

### Objective

The objectives of this policy are to:

* Outline the process for receiving and responding to feedback,
* Detail how and where information regarding our Feedback Policy will be posted.

### Providing Feedback to CSI

Feedback about the delivery of services to persons with disabilities is welcomed and encouraged, as it may identify areas that require change and assist in continuous service improvement. Such feedback may be provided by telephone, in person, in writing or by email. CSI will make best efforts to provide a response in the same format in which the feedback was received.

Any feedback about CSI’s delivery of services to persons with disabilities may be provided directly to:

**Administrative Assistant**  
Conestoga Students Incorporated  
299 Doon Valley Drive

Kitchener, ON  
N2G 4M4  
Toll-Free: 1-866-968-7274  
Email: [csi@conestogac.on.ca](mailto:csi@conestogac.on.ca)

In order to help CSI fully address the feedback received, when possible, the following information must be included:

* Time and date
* Description of feedback, complaint, or suggestion
* Additional comments
* Contact information (should the person wish to be contacted).

### Responding to Feedback

CSI employees will be familiar with how to direct and assist with feedback, complaints, or suggestions about the way in which CSI provides goods and services to people with disabilities. Feedback received will be grouped, reviewed with the CSI management team, and stored by category (feedback, complaint, or suggestion). A record will then be maintained outlining the details, follow-up and actions to be taken.

Where possible, feedback will be addressed immediately. Some feedback may, however, require more time and effort to address and may need to be reviewed before an action is taken; CSI will respond within 20 working days.

### Notice of Feedback Process

Information about CSI’s process for receiving and responding to feedback will be readily available to the public in a number of ways. These include:

* Policy and forms available in service areas
* Policy and forms available on our website

## Staff Training

CSI will provide training to all employees, volunteers, third-party affiliates, others who deal with the public, and all those involved in development and approval of customer service policies and procedures. This training will be provided as a condition of employment to all new staff and on an ongoing basis for current staff to ensure all staff stay current with any policy or procedural changes related to the AODA Customer Service Standard.

Training will include:

* The purposes of the *Accessibility of Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standard
* How to interact and communicate with people with various types of disabilities
* How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
* How to use the assistive devices available on the premises that may assist with the provision of goods or services to people with disabilities, as required by the role.
* What to do if a person with a disability is having difficulty accessing goods and services at CSI areas.

# Employment Service Policy

## Employment Standard

* Recruitment
* Accessible Formats and Communication Supports for Employee
* Workplace Emergency Response Information
* Individual Accommodation Plans
* Return to Work Process
* Performance Management and Career Development and Redeployment

## Recruitment

### Objective

Conestoga Students Inc. is committed to providing equal access to employment opportunities without regard to any prohibited ground of discrimination. If you anticipate any need for accommodations in the process of applying, interviewing, or working, please feel free to let us know as soon as possible and at any time so that we are most equipped to provide a barrier-free experience.

The objective of this policy is to outline the process for ensuring our recruitment and selection process is barrier-free for all candidates.

### Accommodations in the Application Process

Applicants who possess the requisite skills to perform the essential duties of a job and who have accommodation needs shall be considered equally to those applicants who do not have such needs.

In all job postings, CSI shall include information about the availability of accommodations for applicants with disabilities in its recruitment process, using the following statement:

*Conestoga Students Inc. is committed to providing equal opportunity for employment. If you have any need for accommodations while applying or interviewing, please feel free to let us know as soon as possible. Upon request, CSI will arrange suitable accommodations that take into account your needs.*

### Accommodations in the Selection Process

Job applicants who are individually selected for an interview and/or testing shall be notified by the person responsible for arranging the interview process that accommodations are available as needed to participate in the selection process.

If accommodation is requested, CSI Human Resources will consult with the applicant to arrange reasonable and appropriate accommodation for their specific needs (e.g., translators, documents in Braille, wheelchair accessible interview room, rescheduling of interviews).

### Discussing On-the-Job Accommodations in the Interview Stage

The candidate may choose to discuss accommodations needed to perform the duties of the job, or the interviewer(s) may make inquiries related to the candidate’s ability to perform the essential duties of the job. Candidates will be assessed solely in terms of the qualifications required for the job and their ability to perform the essential duties of the job.

### Successful Candidates Who Require Accommodation

Successful candidates shall be notified about CSI's policies for accommodating employees with disabilities as part of their offer of employment; such candidates may indicate the need for accommodation at this time. Steps to be taken for accommodation at this stage will follow the procedures for employees.

### Employee Supports

CSI will inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability. CSI will provide this information to new employees as soon as practicable after they begin their employment and will provide updated information to all employees whenever there is a change to existing policies.

## Accessible Formats and Communication Supports for Employees

Upon an employee’s request, CSI shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

1. information that is needed in order to perform the employee’s job; and
2. information that is generally available to employees in the workplace.

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

## Workplace Emergency Response Information

If an employee’s disability is such that workplace emergency response information is necessary and CSI is aware of the need for accommodation, this information shall be provided to employees. In addition, this information shall be provided, with the employee’s consent, to the person designated to provide assistance. The information shall undergo review when the employee moves to a different location, when the employee’s overall accommodation needs or plans are reviewed and when CSI reviews its general emergency response plan.

## Individual Accommodation Plans

### Objective

A written process for the development and maintenance of documented Individual Accommodation Plans (IAPs) shall be developed for employees with disabilities when requested. These plans shall include information regarding accessible formats and communications supports. If requested, the plans shall also include individualized workplace emergency response information.

Within the guidelines and requirements of the *Ontario Human Rights Code*, the objectives of this policy are to:

* Ensure that each person is considered individually, on a case-by-case basis, in order to determine accommodation requirements.
* Establish an efficient and timely accommodation process that is consistent with principles of confidentiality and shared responsibility.
* Ensure compliance with all applicable legislation and CSI policy.
* Achieve a culture and work environment that is supportive of all employees.
* Create shared accountability and responsibility, including a partnership between senior management, supervisors, and the individual requiring accommodation.
* Ensure respect and dignity for the individual by creating an accommodation plan that meets specific circumstances, while ensuring that general accessibility for all employees in terms of spatial and physical requirements are still maintained.
* Ensure that the person to be accommodated is included and involved in the process and design of the accommodation plan.
* Respect the privacy and confidentiality of the person to be accommodated.

### Duty to Accommodate

CSI has a duty and obligation to take steps that are reasonable up to the point of undue hardship to adjust or modify the work environment and/or the method of doing work in order to address the individual needs of employees who are protected from discrimination under the *Ontario Human Rights Code*. Individuals requesting accommodation shall be involved and included in the development of accommodation measures that address their needs; likewise such individuals are responsible for communicating any known accommodation needs and to cooperate in the accommodation process.

### Requesting Accommodation

The employee will notify Human Resources of the need for job accommodation and will submit an Accommodation Plan Request Form in which the employee will identify any known accommodation needs. The employee will then cooperate with reasonable requests for evidence pertaining to their accommodation needs and will cooperate with CSI in the process of developing and implementing their IAP.

If a department manager or supervisor has reason to believe there is an accommodation need or receives an Accommodation Plan Request Form, he/she has the responsibility to promptly and positively notify Human Resources so that action can be taken on the request in a timely fashion.

### Creating an Individual Accommodation Plan

Upon receiving a request for an Individual Accommodation Plan, Human Resources will prepare an Individual Accommodation Plan which will outline the nature of the accommodation to be provided.

In developing the employee’s IAP, Human Resources will consult with the employee and with their supervisor to adjust or modify their work environment and/or method of doing work in order to address their individual needs. It is particularly important that all parties work together to establish objectives for the individual’s accommodation plan, to explore the range of accommodation options available, and to develop criteria that will be used to select from among the various options.

If the accommodation for an employee results in a reduction of hours or if there is a significant reallocation of work duties to the extent that the job has changed, the position will be revaluated.

The following are key components of the employment accommodation process for individuals. They are intended to help ensure timely and effective outcomes. The components should be interpreted with flexibility and modified according to the specific needs of each job applicant and employee:

1. Identify needs
2. Identify and analyze barriers to performance or participation
3. Define accommodation objectives
4. Provide interim accommodation
5. Investigate, test and select accommodation options
6. Implement accommodation
7. Provide accommodation training if required
8. Follow-up and evaluate

## Return to Work Process

CSI shall have in place a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work process shall outline the steps that CSI shall take to facilitate the return to work and will be in accordance CSI’s Return to Work Program as per Health & Safety policies.

## Performance Management and Career Development and Redeployment

Managers shall take into account the accessibility needs and Individual Accommodation Plans of its employees with disabilities when addressing career development, performance management, and redeployment opportunities. Such information will not influence negative feedback regarding performance management, career development, or redeployment.

# Information and Communication Policy

## Information and Communication Standard

* Feedback
* Accessible Websites and Web Content
* Accessible Formats and Communication Supports

## Feedback

Feedback about the delivery of services to persons with disabilities is welcomed and encouraged, as it may identify areas that require change and assist in continuous service improvement. Such feedback may be provided by telephone, in person, in writing or by email. CSI will make best efforts to provide a response in the same format in which the feedback was received.

Where possible, feedback will be addressed immediately. Some feedback may, however, require more effort to address and may need to be reviewed before an action is taken; CSI will respond within 20 working days.

Feedback may be provided directly to:

**Administrative Assistant**  
Conestoga Students Incorporated  
299 Doon Valley Drive

Kitchener, ON  
N2G 4M4  
TF 1-866-968-7274  
Email: csi@conestogac.on.ca

## Accessible Websites and Web Content

Internet websites and web content controlled directly by CSI shall conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA in accordance with the schedule set out in the AODA Integrated Accessibility Standards.

## Accessible Formats and Communication Supports

Upon request, and in consultation with the person making the request, CSI will provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports shall be provided in a timely manner, taking into account the person’s accessibility needs and at a cost that is no more than the regular cost charged to other persons, in accordance with the Accessible Formats and Communication Supports Procedures. This does not apply to products and product labels, unconvertible information or communications and information that CSI does not control directly or indirectly through a contractual relationship.

If it is determined that information or communications are unconvertible, the department shall provide the person requesting the information or communication with:

* an explanation as to why the information or communications are unconvertible.
* a summary of the unconvertible information or communications.

## Modifications to this policy

We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities. These policies will be reviewed on an annual basis.

## Questions about this policy

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about this policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to, the CSI AODA committee.