



POLICY: AB
SUBJECT: ACCESSIBILITY
APPROVAL DATE: May 15, 2023
REVISION DATE:
PAGE: 1 of 11

1. GENERAL

- 1.1 In accordance with the Accessibility for Manitobans Act (AMA) the Winnipeg School Division (WSD) is committed to providing equal access and participation for all people.
- 1.2 WSD believes in the principle of Human Rights as identified in the Manitoba Human Rights Code, the Canadian Charter of Rights and Freedoms and the United Nations Universal Declaration of Human Rights.
- 1.3 WSD is committed to creating and maintaining an environment in which students, parents and employees are aware of and respect the rights and human dignity of others.
- 1.4 WSD believes in inclusion and is committed to accommodating people with visible and non-visible disabilities in ways that allow them to maintain dignity and independence.
- 1.5 WSD shall use reasonable efforts to ensure that barriers to accessibility are identified, prevented and removed to ensure the participation of those with disabilities and will ensure all policies, procedures and practices reflect these efforts.
- 1.6 WSD is committed to identifying, preventing and removing accessibility barriers in a timely manner.
- 1.7 WSD will support the implementation of the Accessibility Standards set out on a graduated basis in the following areas: customer service, employment, information and communication, transportation, design of public space.

2. DEFINITIONS

- 2.1 Disability - a person with a disability is a person who experiences a mental, cognitive or sensory impairment for which they may require accommodation.
- 2.2 Barrier - for a person who has a physical, mental, intellectual or sensory disability, a barrier is anything that interacts with that disability in a way that may hinder the person's full and effective participation in society on an equal basis. Examples include: physical barriers, architectural, information or communication barriers, attitudinal barriers, technological barriers, barriers established/perpetuated by policy or practice.
- 2.3 Attitudinal Barriers - result when people think or act based on false assumptions. Action on attitudinal barriers leads to discrimination. Examples: Talking to a support person instead of the person with a disability, because of an assumption that the person with the disability cannot talk or understand.
- 2.4 Informational and Communication Barriers - are created when information is offered in a form that suits some, but not all. They prevent people from being able to understand or access information. Examples: Print on a form that is too small or unclear can create a barrier for a person who is visually impaired. Technical language, long sentences and words with many syllables can create a barrier for a person with an intellectual disability.
- 2.5 Technological Barriers - occur when technology, or the way it is used, cannot be accessed by people with disabilities. Examples: A website that does not support screen-reading software can create a barrier for a person who is visually impaired. A website with photos or images without narrated audio descriptions can create a barrier for a person who is blind.



POLICY: AB
SUBJECT: ACCESSIBILITY
APPROVAL DATE: May 15, 2023
REVISION DATE:
PAGE: 2 of 11

- 2.6 Systemic Barriers - arise from policies, practices, or measures that result in some people receiving unequal access or being excluded. Example: A no animal policy can create a barrier for a person with a service animal.
- 2.7 Physical or Architectural Barriers - are aspects of physical spaces that make it difficult for some people to easily access a place. Examples: A hallway or doorway that is too narrow or cluttered can create a barrier for a person who uses a wheelchair, electric scooter, or walker to pass through safely. Poor lighting can create a barrier for a person who is visually impaired.
- 2.8 Service Animal is a service animal as defined in The Human Rights Code.
- 2.9 Support Person means in relation to a person who is disabled by a barrier, a person who accompanies the person to assist the person in addressing their communication, mobility, personal care or medical needs.
- 2.10 Educational Material includes:
- a) Textbooks;
 - b) Supplementary learning resources, including reference books, workbooks and educational kits;
 - c) Student records; and
 - d) Class, lesson, workshop or program:
 - Descriptions;
 - Availability;
 - Scheduling; and
 - Requirements.
- 2.11 Accessible Customer Service
- Accessible Customer Services is provided when all persons who are reasonable expected to seek to obtain, use or benefit from a good or service have the same opportunity to obtain, use or benefit from the good or service.
- 2.12 Accessible Communication
- Accessible Communication means communication of information in a manner that is free from barriers that prevent or hinder a person from obtaining, using or benefiting from the information.
- 2.13 Accessible Format
- Accessible Format includes large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- 2.14 Communication
- Communication means the transfer of information between two or more persons or entities or any combination of them.



POLICY: AB
SUBJECT: ACCESSIBILITY
APPROVAL DATE: May 15, 2023
REVISION DATE:
PAGE: 3 of 11

2.15 Communication Support

Communication Support includes captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communication.

3. ACCESSIBILITY BARRIERS

3.1 WSD is committed to eliminating and/or reducing accessibility barriers in the following areas:

- a) Customer Service;
- b) Employment;
- c) Information and Communication;
- d) School Transportation;
- e) Design of Public Space.

4. CUSTOMER SERVICE

4.1 WSD will identify, remove and prevent barriers to accessible customer service that exists within schools/facilities.

4.2 WSD will ensure that if an existing barrier cannot be removed that an alternate option for accessibility will be provided to the individual, when possible.

4.3 WSD may apply a fee or charge for costs incurred if reasonable accessibility accommodations cannot be made for the individual.

4.4 WSD shall provide opportunities for public feedback on accessibility in relation to customer service.

4.5 Assistive Device

WSD shall accommodate the use of assistive devices when requested to remove or reduce the barrier for the individual.

4.6 Support Person

WSD shall permit a support person to who may accompany any individual who is disabled by a barrier to any school facility or event.

4.7 Service Animal

In accordance with Policy JI – Service Animals, WSD shall permit a service animal to accompany any individual who is disabled by a barrier to any school/facility or event.

4.8 Built Environment

WSD shall ensure that any aspect of its built environment intended to facilitate barrier-free access to the goods and services are available for use in the intended manner.



POLICY: AB
SUBJECT: ACCESSIBILITY
APPROVAL DATE: May 15, 2023
REVISION DATE:
PAGE: 4 of 11

WSD shall ensure that any aspect of the built environment that is unavailable for use, that notice will posted on school websites outlining the reason and an estimate of when the service will resume, including options for alternatives to access goods and services.

4.9 Customer Service Training

WSD will ensure that customer service training is provided to employees and those responsible for the development and implementation of policies and practices, including volunteers who are responsible for:

- a) Interacting and communicating with individuals disabled by barriers;
- b) Interacting with individuals disabled by barriers who use an assistive device or require the assistance of a support person or service animal;
- c) Using equipment or assistive devices that may be available to assist individuals disabled by barriers; and
- d) Providing assistance to an individual disabled by a particular barrier who is having difficulty accessing a good or service;
- e) A review of The Human Rights Code and the Accessibility Act and regulations.

WSD shall document its training policy, including a summary of the content of the training and when training is provided.

4.10 Public Events

WSD shall make school and public events accessible by:

- a) Announcing events in a manner that is accessible;
- b) Holding event(s) in accessible meeting places;
- c) Ensuring that the physical and communication needs of the individuals disabled by barriers are met on request; and
- d) Inviting requests for relevant disability accommodation.

4.11 Documentation

WSD shall provide a documentation of the measures, policies and practices it establishes and implements under applicable legislation, upon request, within a reasonable time and at no cost to the individual.

5. EMPLOYMENT

5.1 WSD shall provide accommodations for an applicant to access the materials or activities used in the assessment or selection process that would not result in undue hardship to WSD.

WSD will inform all job applicants that accommodations are available up in request.



POLICY: AB
SUBJECT: ACCESSIBILITY
APPROVAL DATE: May 15, 2023
REVISION DATE:
PAGE: 5 of 11

5.2 Recruiting Employees

When recruiting employees, WSD shall inform:

- a) Potential applicants of the availability of reasonable accommodations for those who may be disabled by a barrier in respect of the assessment or selection process; and
- b) Applicants that, on request, reasonable accommodations may be available for those who may be disabled by a barrier in respect of the materials or activities used in the assessment or selection process.

When an applicant makes a request for accommodation, the Chief Human Resource Officer shall:

- a) Consult with the applicant to determine the accommodations required for the barrier or barriers that are identified; and
- b) Provide or arrange for the provision of, those accommodations required when carrying out the assessment or selection process.

5.3 Individualized Accommodation Plan

WSD will consult with employees to develop an individualized accommodation plan.

An individualized accommodation plan shall include documentation as follows:

- a) Any accessible formats and communication support to be used in providing information to the employees;
- b) Any workplace emergency response plan; and
- c) Any other reasonable accommodation to address any barriers that disable the employee and the manner and timing within which the accommodation is to be made.

Employees will cooperate in the establishment and implementation of the individualized accommodation plan, including:

- a) Providing any relevant information that may assist WSD in the assessment of the accommodation request, including any medical reports or reports by other practitioners in the area of workplace accommodations for persons disabled by barriers;
- b) Complying with the accommodation plan;
- c) Providing feedback with respect to the requirements of the accommodation plan;
- d) Participating in and cooperating with accommodation efforts on an on-going basis, including communicating with the Chief Human Resource Officer if modifications to the accommodation plan are requested or if accommodation is no longer required;
- e) Participating in an evaluation to assist the Chief Human Resource Officer in determining what reasonable accommodation is required.

The Chief Human Resource Officer will review and update if required, the individualized accommodation plan:

- a) When the employee's workspace is modified or relocated;
- b) When the employee's responsibilities are changed; or
- c) When the Chief Human Resources Officer becomes aware that there are any other changes that impact the accommodation required.



POLICY: AB
SUBJECT: ACCESSIBILITY
APPROVAL DATE: May 15, 2023
REVISION DATE:
PAGE: 6 of 11

5.4 Workplace Emergency Response/Workplace Assistance

The Chief Human Resources Officer will consult with the employee to discuss the requirements of an emergency plan, where assistance is required in the event of an emergency.

The Chief Human Resource Officer must obtain the consent of the employee to share personal health information and review the emergency plan with the person(s) identified by the employee to provide assistance.

5.5 Return To Work Process

WSD is committed to providing a workplace that supports employees who have been absent from work due to a non-work-related illness, injury or disability and who require an accommodation in order to return to work.

WSD will endeavour to accommodate employees by removing barriers that limit, restrict or prevent employees from participating fully and equally in the workplace, to the point of undue hardship.

Failure to provide, or facilitate the provision of, medical documentation reasonably sufficient to the employer within a reasonable time frame may conclude the employer's duty to accommodate the employee.

5.6 Accommodation Training

WSD will ensure that accommodation training is provided to employees who are responsible for:

- a) Recruiting, selecting or training employees;
- b) Supervising, managing or coordinating employees;
- c) Promoting, redeploying or terminating employees; or
- d) Developing and implementing employment policies and practices.

Accommodation training will include:

- a) Employment opportunities that may be made accessible to persons disabled by barriers;
- b) Interaction and communication with persons disabled by barriers; and
- c) Interaction with persons disabled by barriers who use an assistive device or require the assistance of a support person or service animal;
- d) A review of The Human Rights Code and The Accessibility for Manitobans Act

5.7 Performance Management/Career Development

WSD shall ensure that any performance management/career development process implemented will consider the following:

- a) The employee may be temporarily or permanently disabled by one or more barriers;
- b) The employee individualized accommodation plan; and
- c) The accommodations provided for the employee may not fully address a barrier that disables the employee.



POLICY: AB
SUBJECT: ACCESSIBILITY
APPROVAL DATE: May 15, 2023
REVISION DATE:
PAGE: 7 of 11

5.8 School Library Resources

WSD will consider the accessibility needs of students and employees when procuring/purchasing library resources.

WSD shall ensure that all school libraries inform students and employees of resources that are currently available through a communication support or accessible format and the types of supports or formats that are available with respect to that resource.

Students and employees may request a school library to provide a resource through a communication support or accessible format.

Any requests for a library resources through a communication support or accessible format, WSD will:

- a) Consult with the person to identify the support or format that would remove the barrier; and
- b) Provide information to the person through the identified support or format in a timely manner.

If educational material cannot reasonably be provided through a communication support or accessible format, WSD will provide a comparable resource.

5.9 Fees

WSD will not impose a cost or fee on a person who requests that educational material be provided through a communication support or accessible format that is greater than the cost or fee that would be imposed on a person who did not make the request.

6. INFORMATION AND COMMUNICATION

6.1 Accessible Educational Materials

WSD will inform the following individuals that educational materials are available through a communication support or accessible format on request:

- a) Employees;
- b) Students;
- c) Applicants and prospective applicants;
- d) Parents/guardians of students.

6.2 WSD Website

All WSD web content shall meet or exceed the standards set out in the World Wide Web Content Accessibility Guidelines WCAG 2.1 Level AA if one or more of the following applies:

- a) The web content is published on or after the day this regulation applies to the organization;
- b) The web content is required to access the organization's goods and services.



POLICY: AB
SUBJECT: ACCESSIBILITY
APPROVAL DATE: May 15, 2023
REVISION DATE:
PAGE: 8 of 11

6.3 Information and Communication Training

WSD will ensure that communication training is provided to employees who are responsible for:

- a) Communication directly with the public or to another organization in Manitoba on behalf of WSD, including employees and volunteers;
- b) Any employee who is a teacher;
- c) Developing or maintaining WSD's web content;
- d) Purchasing or procuring information technology or communication tools;
- e) Developing and implementing policies and practices respecting accessible communication.

Information and Communication training will include:

- a) Instructions on how to identify, prevent and remove barriers to accessible communication;
- b) Instructions on how to provide information through a communication support or accessible format; and
- c) A review of The Human Rights Code and The Accessibility for Manitobans Act.

6.4 Duty to Notify

WSD shall notify the public that upon request, information through a communication support or accessible format will be provided, if possible.

WSD shall provide information, including emergency procedures or public safety, through a communication support or accessible format, upon request, except when technology is not available or WSD does not have direct control over the information.

7. STUDENT TRANSPORTATION

- 7.1 WSD will provide and consider the best option for transportation service based on the requirements and safety needs of the student.
- 7.2 WSD will develop a Transportation Plan for each student with a disability outlining boarding and securement needs of the student.
- 7.3 WSD will review the Transportation Plan with the parents/guardians. WSD will review the Transportation Plan with the bus driver at the start of each school year.

8. DESIGN OF PUBLIC SPACES

- 8.1 WSD shall comply with the Accessibility Standard for the Design of Public Spaces in companion to the Manitoba Building Code for the planning, organization and construction of exterior school buildings/facilities.
- 8.2 WSD shall incorporate the principles of inclusive design to enable equitable access, participation and the elimination of systemic barriers where identified.



POLICY: AB
SUBJECT: ACCESSIBILITY
APPROVAL DATE: May 15, 2023
REVISION DATE:
PAGE: 9 of 11

8.3 WSD will comply with accessibility requirements as outlined in the Integrated Accessibility Standards during renovations to existing facilities/property as follows:

- a) Outdoor play spaces or new play spaces;
- b) Exterior pedestrian walkways/sidewalks, connected stairs/ramps;
- c) Parking facilities;
- d) Indoor reception/public areas.

8.4 When required, WSD shall consult with the public and persons with disabilities prior to new construction or redevelopment in existing facilities or grounds.

9. RESPONSIBILITIES

9.1 Chief Superintendent/CEO

The Chief Superintendent/CEO shall be responsible for the implementation of the Accessibility Policy.

9.2 Superintendent of Schools

The Superintendent of Schools shall review and identify budget requirements to support the removal of barriers.

9.3 The Chief Human Resource Officer

The Chief Human Resource Officer shall ensure that accessibility training is available for all employees and volunteers in the areas of:

- a) Customer Service;
- b) Employment;
- c) Information and Communication;
- d) School Transportation;
- e) Design of Public Space.

9.4 Principal

The Principal shall be responsible to ensure that the accessibility needs of students, staff and public are identified and prevented on school property.

The Principal is required to assess the needs of students, staff and visitors on a yearly basis at the beginning of the school year.

The Principal is required to assess temporary barriers caused by renovations, chemicals, computer software, etc.

The Principal is required to notify students, employees and the public on the school website when barriers exist on a temporary basis.



POLICY: AB
SUBJECT: ACCESSIBILITY
APPROVAL DATE: May 15, 2023
REVISION DATE:
PAGE: 10 of 11

10. ANNUAL ACCESSIBILITY PLAN

10.1 In accordance with the Accessibility for Manitobans Act, WSD shall publish an Accessibility Plan every second year.

11. FEEDBACK PROCESS

11.1 WSD shall provide opportunities for public feedback on accessibility in the areas of:

- a) Customer Service;
- b) Employment;
- c) Information and Communication;
- d) School Transportation;
- e) Design of Public Space.

11.2 WSD shall provide copies of all policies and accessibility plans required under the Accessibility for Manitobans Act in an accessible format upon request.

11.3 WSD will maintain an accessibility committee and implement policies, procedures and practices in relation to the requirements in the Accessibility for Manitobans Act.

12. PRIVACY

12.1 Employees are required to comply with FIPPA and PHIA legislation, which governs access to and protection of personal information or personal health information, and addresses the collection, use, and disclosure of personal information.

12.2 Employees are required to meet certain obligations in regard to the collection, use, retention and destruction of any personal information or personal health information collected under FIPPA or PHIA legislation.

12.3 WSD shall collect, use and disclose information in accordance with legislation, unless consent is given regarding the use or disclosure.

13. BREACH OF PRIVACY

13.1 A Breach of Privacy occurs when Personal Information, including Personal Health Information, is collected, accessed, used, disclosed, transported, transmitted, transferred or destroyed other than as authorized, or when the accuracy, confidentiality or integrity of the information is compromised and therefore is in violation of FIPPA or PHIA. Breaches may include, but are not limited to, the viewing of Confidential Information by unauthorized individuals, the access, theft or loss of WSD Records and the unauthorized destruction of such information by deliberate means or by human or natural accident.

13.2 All breaches are required to be reported immediately to the Access and Privacy Coordinator.

13.3 Any person associated with the WSD who becomes aware of a possible or actual Breach of Privacy, shall immediately report the possible or actual Breach of Privacy to the Access and Privacy Officer and/or Coordinator, who shall take immediate steps to contain the Breach.



POLICY: AB
SUBJECT: ACCESSIBILITY
APPROVAL DATE: May 15, 2023
REVISION DATE:
PAGE: 11 of 11

- 13.4 All Breaches of Privacy will be investigated by the Access and Privacy Officer and Coordinator.
- 13.5 The Access and Privacy Officer and Coordinator will make recommendations for immediate and long-term corrective measures as necessary to protect the confidentiality, integrity and security of all Personal Information and Personal Health Information.