



PROCEDURE

Title:	ACCOMMODATION OF STAFF USE OF GUIDE DOGS AND SERVICE DOGS	Procedure No.: 1011b Effective Date: DRAFT April 21, 2023
Department:	Organizational Support Services – Human Resources	
Reference(s):	Accommodation Policy 1011 Accommodation Procedure 1011a Student Use of Guide Dogs and Service Animals Procedure 5018 O.Reg 191/11 Integrated Accessibility Standard	

Statement

The use of Guide Dogs /Service Dogs is one strategy used to accommodate the needs of individuals with disabilities. This procedure provides direction to Principals / Supervisors regarding the admittance and implementation of Guide Dogs/Service Dogs for staff at any TVDSB location. The success of the implementation of Guide Dogs/Service Dogs depends on clear communication, a well-informed school / work community and careful planning. The information provided will assist the Principal / Supervisor to make the best possible arrangements for staff with disabilities as well as other students, staff, volunteers and visitors to a TVDSB location or related event. Accommodation approval will follow the *TVDSB Accommodation Procedure*, in consultation with Human Resource Management and Superintendent of Human Resources. Guide Dogs/Service Dogs used in a TVDSB location will follow the communication and orientation processes as in the *TVDSB Procedure Student Use of Guide Dogs and Service Animals (5018)*. This process will include taking into consideration other requirements of staff and students including any allergies, fears, etc. and, where necessary, making applicable changes.

Scope

This Procedure applies to all TVDSB staff. Students requiring Service Dogs are to follow Procedure 5018a Student Use of Guide Dogs and Service Animals Procedure, 5018

Purpose

It is TVDSB's policy, in accordance with its obligations pursuant to the Ontario *Human Rights Code* (the "Code"), to provide individualized accommodation to staff with disabilities, which can include the use of Guide Dogs / Service Dogs.

Administered By:	Human Resource Services – Human Resources
Amendment Date(s):	
Most Recent EIE Review Date:	January 18, 2023

1.0 Definitions

For the purpose of this Procedure, the following definitions apply:

- 1.1 **Accredited training organization for a service dog** is accreditation by a training organization such as, but not limited to the below examples:
- a) Canine Good Neighbour – Canadian Kennel Club
 - b) Advanced Obedience Training
 - c) Temperament Test
- 1.2 **Accredited training organization for a guide dog** is accreditation by a training organization such as, but not limited to the below examples:
- a) International Guide Dog Federation (“IGDF”): which develops and ensures compliance with the standards by which Guide Dogs for the blind/low vision are trained by its member organizations.
 - b) Assistance Dogs International (“ADI”): which develops and ensures compliance with the standards by which Guide, Hearing and Service Dogs are trained by its member organizations; or
 - c) A Guide Dog or Service Dog trainer that attests to compliance with the Meghan Search and Rescue Standard in Support of Accessibility: Persons with a Disability Teamed with Service Dogs standard for training (MSAR).

1.3 Disability means:

- 1.3.1 Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other Dogs or a wheelchair or other remedial appliance or device;
- 1.3.2 A condition of mental impairment or a developmental disability;
- 1.3.3 A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- 1.3.4 A mental disorder; or
- 1.3.5 An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act*.

The definition of “*disability*” is subject to change in order to comply with any changes to the *Code*, the *Accessibility for Ontarians with Disabilities Act* (“AODA”), or any successor legislation.

1.4 **Guide Dog** is a dog trained as a guide for a blind/low vision person and having the qualifications prescribed by the regulations pursuant to the *Blind Persons' Rights Act*.

1.5 **Service Dog** is a Dog that performs specific tasks for people with disabilities which may include, but are not limited to, deep pressure therapy, anchoring, stimulus distraction, and alerting their Handler to a change in medical status. A Dog will only be accepted as a Service Dog for the purpose of this Policy if the Handler provides documentation from a regulated health professional, in accordance with the Integrated Accessibility Standards regulation under the AODA, confirming that the person requires the Dog for reasons relating to the disability.

1.6 **Handler** refers to the individual who is managing the Guide Dog/Service Dog and who will be trained by a training organization to manage the Dog.

2.0 ROLES AND RESPONSIBILITIES

2.1 School Principals/Supervisors are responsible for accommodation planning and for the management of their TVDSB location and the safety of all staff. School Principal/Supervisors are required to complete Appendix B. Where the safety of staff or students may be at risk the Principals/Supervisors will revisit the accommodation plan for use of service dog. This may include removing the Service Dog / Guide dog from the location during the evaluation. (Appendix B *Principal/Supervisor Checklist of Student Use of Guide Dogs and Service Dogs Procedure*).

2.2 TVDSB Accommodation Procedure is to be followed by all staff seeking accommodation including any requirement identified under the O. Reg. 191/11 Integrated Accessibility Standards under the AODA, or the *Blind Persons' Rights Act*, and/or the *Code*.

2.3 Staff Members are to provide all necessary documentation to Abilities and Wellness and engage in the consultation process for the purpose of considering and implementing, if appropriate, the request that a Guide Dog/Service Dog accompany the employee at school and/or on school-related activities. Abilities and Wellness will work with staff members to complete all requirements, noting this may take some time. Staff will be required to report all injuries through the Health and Safety incident reporting process.

2.4 Staff Member requesting a Guide Dog / Service Dog shall be responsible for:

2.4.1 Submission of the Application for Guide Dog/Service Dog prior to bringing a Guide Dog/Service Dog onto TVDSB property or to a TVDSB-related event (see Appendix A);

- 2.4.2 All costs related to the Guide Dog/Service Dog, including but not limited to:
 - 2.4.2.1 Food, grooming, leash, harness, crate and/or mat, veterinary care, classroom cleaning due to dog, et cetera;
 - 2.4.2.2 Obtaining training and maintaining the Guide Dog/Service Dog training to provide the accommodation in a safe manner that does not disrupt student learning or staff productivity;
 - 2.4.2.3 Providing confirmation of municipal license, if applicable, for the Guide Dog/Service Dog (to be updated annually);
 - 2.4.2.4 Providing confirmation of certificates of training not older than 6 months (unless otherwise approved through Abilities and Wellness) from a training organization attesting that the Guide Dog/Service Dog and Handler have successfully completed training;
 - 2.4.2.5 Providing confirmation of a required medical accommodation due to a disability. This will include nature of illness/injury from a registered family physician, nurse practitioner, pediatrician, psychologist, psychiatrist, audiologist, optometrist, or other regulated professional outlined in the Integrated Accessibility Standards Regulation under the AODA, with a recommendation for the use of a Guide Dog/Service Dog;
 - 2.4.2.6 Providing a description of the services provided to the employee by the Guide Dog/Service Dog and how those services will accommodate the employee's disability-related needs and assist the employee in achieving their essential duties at school in the workplace and at school related event; and
 - 2.4.2.7 Approval by Principal and Abilities and Wellness is required prior to dog attending work with the staff member.
- 2.4.3 Providing a certificate not greater than three (3) months old from a veterinarian qualified to practice veterinary medicine in the Province of Ontario attesting that the Dog is an adult; does not have a disease or illness that might pose a risk to humans, has received all required vaccinations and is in good health to assist the staff; and identifying the age and breed (to be updated annually).
- 2.4.4 Providing evidence confirming general liability insurance providing coverage in an amount of one million dollars in the event of an injury or death as a result of the Guide Dog/Service Dog attendance on TVDSB property or on a TVDSB-related activity;

- 2.4.5 The handler of the dog must have the demonstrated ability to control the Guide Dog/Service Dog in the school community and during school related activities. The dog must be able to safely engage in a public setting without creating a risk of safety or a risk of disruption within a school setting;
- 2.4.6 Ensure that the Guide Dog/Service Dog is always wearing a vest and leash or harness when the Dog is working on TVDSB property;
- 2.4.7 Ensure the Guide Dog/Service Dog does not disrupt the work environment with unnecessary movement, vocalization or other behaviour, including aggressive or threatening behaviour;
- 2.4.8 Ensure that the Guide Dog's/Service Dog's biological needs are addressed, complete Management Plan for the Care of Guide Dog/Service Dog (see Appendix C);
- 2.4.9 Transition and maintain at all times the Guide Dog/Service Dog on a leash, a harness, or in a crate; and
- 2.4.10 Comply with an accommodation plan that addresses the competing rights of others.

2.5 The Guide Dog/Service Dog:

- 2.5.1 Shall be highly trained;
- 2.5.2 Will have evidence of successful completion of training requirements within the last 6 months or otherwise approved by Abilities and Wellness, and demonstration of care and control of the dog or as requested by the Supervisor/Principal;
- 2.5.3 Must be groomed and clean;
- 2.5.4 Must at all times, while on TVDSB property or at a TVDSB-related event, be responsive to commands and demonstrate that it can perform the necessary tasks or accommodation;
- 2.5.5 Must not engage in behaviour that puts at risk the safety of others, including other Dogs, or that creates disruption or distraction in the learning environment:
 - i. such behaviour includes, but is not limited to, growling, nipping, barking, attention seeking, eating;
 - ii. any such behaviour is grounds to prohibit the Guide Dog/Service Dog.
- 2.5.6 While attending a TVDSB building, must have control of its biological functions so as not to soil the inside of buildings, or require feeding and

watering during the school day (aside from designated breaks such as recess or lunch when the staff member has designated free time);

- 2.5.7 Must demonstrate continuous appropriate behaviour with its Handler and others in the school environment to remain eligible for entry in school buildings or school-related events.
- 2.5.8 Alternate arrangements will be made if the service dog is unable to be present with staff at all times (example during Hospitality class)

2.6 Further to the Accommodation Procedure:

- 2.6.1 A school principal/supervisor, in consultation with the Superintendent with responsibilities for the staff member's department/school and the Superintendent of Human Resources, has authority to exclude any animal, including a Guide Dog/Service Dog, from entry onto TVDSB premises and into TVDSB building(s). As an accommodation for the employee, they must be offered appropriate alternative accommodation(s) to meet the employee's demonstrated disability-related needs.

2.7 Summary of Documentation Required for Accommodation Approval:

- 1. Application for Guide Dog/Service Dog;
- 2. Applicable Medical Certificate/Abilities Form;
- 3. Proof of Training (training certificate);
- 4. Proof of Vaccination and Veterinary Confirmation to Health;
- 5. Municipal Licensing as applicable;
- 6. Providing proof of liability insurance (3.4.4)

Appendix A

Application for Guide Dog and/or Service Dog is required to be submitted to Abilities and Wellness for evaluation.

Information regarding Guide Dog/Service Dog

Describe in detail the tasks or services performed by the Guide Dog/Service Dog.

Identify the oral commands or visual signs to which the Guide Dog/Service Dog responds.

Attestation will be required confirming that the Guide Dog/Service Dog does not make vocal noises, does not engage in distracting behaviour, and does not exhibit aggression.

Identify whether the Guide Dog/Service Dog will be on a leash, or a harness, or in a crate.

Describe the biological needs of the Guide Dog/Service Dog.



Staff Use of Guide Dogs/Service Dog

Principal/Supervisor Checklist for Guide Dog/Service Dog

Location _____

Position _____

Staff Name _____

Pre-Application Requirements for Guide Dog/Service Dog

- Meeting with applicant and school Principal/Superintendent
- Review and discuss requirements

Application Requirements for Guide Dog/Service Dog

- Assessment report with diagnosis and accommodation to be provided
- Supporting documents (psychological, occupational therapy, physical therapy, functional behaviour, and/or orientation and mobility assessments)
- Copy of municipal license (within 12 months where applicable)
- Veterinary certificate (within 3 months)
- Certificate of training or attestation for Guide Dog/Service Dog (within 6 months or otherwise approved)
- Certificate of insurance (within 3 months) or letter from the registered charity which owns the Guide Dog/Service Dog
- Letter of inquiry with school staff and community using the school pursuant to permit regarding allergies, phobia/fear, or cultural sensitivity

Implementation Requirements upon Approval

- Accommodation plan where there are competing rights (may include restriction of access to areas of school, change in classroom, etc.)
- Management Plan for the Care of Guide Dog/Service Dog
- Timetable identifying bio breaks, when accompanying staff, when in crate
- Emergency procedures (fire exit plan, lockdown plan, evacuation plan)
- Confirmation letter to staff that Guide Dog/Service Dog will be accompanying staff

- Information session at a School Council meeting
- Signage for front door, gymnasium door and library door advising of Guide Dog/Service Dog
- Transportation plan (if required)
- Orientation for school staff and students
- Identification of benchmarks for assessment of effectiveness



Appendix C

Staff Use of Guide Dogs/Service Dog

Management Plan for the Care of Guide Dog/Service Dog

Name of Staff _____

Date _____

Name of Guide Dog/Service Dog _____

School / Site _____

Name(s) of individual(s) responsible for the implementation of the Management Plan for the Care of Guide Dog/Service Animal:

NOTE: Responsibility for care of the animal rests 100% with the individual(s) listed above, not other Thames Valley District School Board staff.

Water needs (e.g., provision of water bowl, procedures for use, cleaning, etc.)

Dietary Needs Procedure

Bladder / Bowel needs of the animal (e.g., frequency, location, disposal, etc.)

Other considerations

1. Rest periods from “work”

2. Hot weather

3. Winter weather

4. Additional Considerations

Signature of Staff Member

_____ Date _____

Signature of Principal/Supervisor

_____ Date _____



Staff Use of Guide Dogs/Service Dogs

Sample Letter Decision Approving Guide Dog/Service Dog

[insert date]

Dear [insert Staff Member's name],

I am writing to communicate the decision regarding your request that you attend work with a Guide Dog/Service Dog to provide accommodation for disability-related needs / acts of daily living.

I wish to confirm approval of your request.

As we have discussed, your ability to perform the responsibilities of a Handler and assessment of benchmarks established for evaluating the effectiveness of the Guide Dog/Service Dog in meeting your accommodation needs will take place on a regular basis.

You will be responsible for ensuring that the Guide Dog/Service Dog is groomed, has a vest, harness, leash or crate [if necessary], as well as a water bowl. All costs associated with the care of the Guide Dog / Service Dog will be your responsibility.

If concerns arise regarding the integration of the Guide Dog/Service Dog into the school community and your work areas, a meeting will be scheduled to review how the issues might be resolved.

In the event that the Guide Dog/Service Dog engages in behaviour that is distracting, disruptive or aggressive, including making noise, failing to follow commands, growling or nipping et cetera, the Handler will be required to remove the Guide Dog/Service Dog from the classroom immediately and you will be required to arrange for the Guide Dog/Service Dog to be removed from the school. In such a case, alternative options for accommodation will be reviewed.

Sincerely,

Abilities and Wellness Department

Cc: Principal/Supervisor



Staff Use of Guide Dogs/Service Dog

Sample Letter Decision Declining Guide Dog/Service Dog

[insert date]

Dear [insert Staff Member's Name],

I am writing to communicate the decision regarding your request that you attend work with a Guide Dog/Service Dog to provide accommodation for disability-related needs at a TVDSB location.

I wish to communicate that your request is being denied.

As we have discussed, you are not able to perform the responsibilities of a Handler [and/or the Guide Dog/Service Dog is not trained and may be disruptive, or a distraction in the school environment], and reasonable alternative accommodations that respect your dignity, encourage independence and facilitate integration are available to support your needs and access to meaningful services.

If you wish to discuss this further, please arrange a time to meet with me and your union/association representative.

Sincerely,

Abilities and Wellness Department

Cc: Principal or Supervisor



Staff Use of Guide Dogs / Service Dogs

Sample Letter to the School Community ()

[insert date]

Dear Parents/Guardians,

This letter is to advise that a Guide Dog/Service Dog will be attending [TVDSB location] with a staff member in order to accommodate the staff member's needs pursuant to the Ontario *Human Rights Code and TVDSB Accommodation Procedure*

The Guide Dog/Service Dog is trained to provide service in a manner that does not disrupt the learning environment for others and is identifiable by its vest. The Guide Dog/Service Dog will be on a leash, a harness or in a crate at all times while on school property or at a school related function.

An information session has been scheduled to take place at a School Council (school only) meeting on [insert date]. A trainer from [insert] will be present to answer any questions that you might have about the training of the Guide Dog/Service Dog.

An orientation session will be provided for all students to explain the role of a Guide Dog/Service Dog as working animals, not pets, and to identify how the Guide Dog/Service Dog will be integrated into our school community.

We respect the needs of all staff and students in providing a safe and inclusive learning environment. Please let us know if you have any specific concerns regarding the presence of a Guide Dog/Service Dog in our school.

Thank you for your on-going support.

Sincerely,

Abilities and Wellness Department

Principal