



ACCESSIBILITY POLICY

Purpose

The purpose of this policy is to:

- articulate and affirm Hamilton Children's Choir's ("HCC", "the Choir") commitment to accessibility;
- provide principles and processes to ensure HCC's compliance with the [*Integrated Accessibility Standards Regulation \("IASR"\)*](#) under the [*Accessibility for Ontarians with Disabilities Act \("AODA"\)*](#), and with the [*Ontario Human Rights code \("OHRC"\)*](#);
- describe responsibilities of HCC staff, volunteers, choristers and their families to ensure HCC's programs are accessible and disability-inclusive;
- facilitate identifying, preventing & removing barriers to the participation of choristers with disabilities.

Scope

This policy applies to the following individuals:

- all Employees of HCC;
- all Volunteers, including members of the Board of Directors;
- all participants in HCC programs;

For the purpose of this policy, "programs" include:

- all rehearsals;
- all performances;
- all activities at community sites;
- all camps, retreats, intensives, and other off-site training activities;
- all travel and tours.

Commitment

HCC is committed to:

- meeting the standards defined in the *AODA*;
- providing programs that are inclusive and accessible to everyone while upholding the health and safety of all participants;
- reducing barriers to enable the fullest possible participation by choristers with disabilities;
- collaborating with choristers and their parents or guardians to identify barriers and develop accommodation plans that will reduce functional limitations to participation;
- respecting the dignity of choristers with disabilities throughout the accommodation process;
- maintaining the confidentiality of choristers' personal health information.

Process for Providing Accommodations



To enable the Choir to provide accommodations that respect each child's dignity, choristers and their parent/guardian are required to participate in the accommodation process in the following ways:

- a. Notify the choir, preferably in writing, that the chorister has a [disability](#) or a need for accommodation. Disclosure of medical diagnoses is not required.
- b. Provide information about the functional limitations or needs associated with the disability. In some cases, the Choir will require documentation from health care professionals, for the purpose of ensuring safety. If the chorister requires medication to be administered by HCC staff, written documentation from a health-care provider must be provided, specifying the medication details.
- c. Report any safety risks to the chorister themselves or to others that might arise from the chorister's disability.
- d. Take part in discussions with Choir staff about possible accommodations that would enable the chorister to participate in HCC programs. The first such discussion should happen at the time that the chorister first enrolls in a program, or at the time that the need for accommodation becomes known. Discussions should continue on an ongoing basis to assess and adjust accommodations as needed.

In the case that a chorister and their parent/guardian does not participate in initial or ongoing discussions about the accommodation process, or does not provide necessary information, it might not be possible for HCC to provide accommodations. In such cases, where participating without accommodations introduces a safety risk to the disabled chorister or to others, the HCC may require the disabled chorister to limit or withdraw participation until the necessary accommodations are implemented.

Support Person

If there is no other way to protect the health and safety of the disabled chorister and others, HCC may require that an adult support person, such as a parent or other caregiver, accompany the disabled chorister. In such cases, the Choir will bear the costs associated with the support person's attendance.

Confidentiality

HCC will maintain the confidentiality of all choristers' personal health information. Information about disabilities and functional limitations is available only to staff and volunteers who require it for the purpose of providing accommodations and maintaining safety.

Training

HCC will provide regular training to its staff and volunteers regarding the duty to accommodate and how to support inclusion of participants with disabilities.

Incident Reporting Protocol



Any medical, behavioural, or safety incident will be documented by Choir staff using HCC's Incident Reporting Form. Reports will be reviewed by the Executive Director and kept on file. Parents/guardians will be notified promptly of any reported incidents involving their child. Incident reports may be used to inform ongoing discussions about accommodations.

Definitions

For the purpose of this policy, chorister refers to any participant in HCC's choirs, camps, and community activities. In this policy, the term includes not only enrolled choir members, but also participants in summer day camps, and non-enrolled participants in community activities.

Furthermore, HCC adopts the following definitions used in the *AODA*:

"barrier" means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

"disability" means:

- a) 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 animal or on a wheelchair or other remedial appliance or device,
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997; ("handicap").

Policy Review

This policy will be reviewed annually for the first year and then every three years thereafter. The policy will be updated as needed to reflect evolving best practices, feedback, and organizational learning.

Last Updated: February 2, 2026



Appendix A: Example Scenarios

The following examples are not exhaustive. They are provided to show how accommodations could be implemented in some cases.

Example A

A chorister has an anaphylactic allergy to peanuts. The chorister's family informs HCC that the child has this allergy and that the chorister is able to participate fully in the program as long as peanut products are not present in program spaces. In order to accommodate this disability, the Choir institutes a policy forbidding peanut products in all program spaces. The family provides written documentation from a health-care provider reporting the need for the child to carry an EpiPen with them. HCC staff are trained to recognize the symptoms of anaphylaxis and to administer the EpiPen. This disability does not introduce risks to any other persons but is a substantial risk to the disabled chorister.

Example B

A chorister has a learning disability that limits their ability to complete written theory assignments. The parent informs HCC about the nature of the limitation. Together, the Choir, the parent and the child determine that the chorister can complete theory assignments if they have a scribe. The Choir recruits a former chorister to volunteer as scribe to support the chorister in completing written assignments. The Choir signs off on the scribe's volunteer hours for this work. This disability does not introduce safety risks to the disabled chorister or to other persons.

Example C

A chorister has a chronic condition that impairs their energy levels. Their parent informs the Choir that the child is not capable of participating in five hours of rehearsal each week. The initial accommodation is for the chorister to sit rather than stand throughout rehearsals. After several rehearsals it becomes clear that this accommodation is not sufficient to enable the chorister to participate fully. The choir, chorister and family together decide that the chorister will instead join an HCC choir that rehearses only two hours a week, and will continue to sit during rehearsals. The chorister and conductor agree to leave open the decision about whether to sit for performances until they've assessed their energy levels on the performance day.



Appendix B: Relevant Laws and Regulations

Ontario Human Rights Code

[Human Rights Code, R.S.O. 1990, c. H.19"](#)

"Disability

17 (1) A right of a person under this Act is not infringed for the reason only that the person is incapable of performing or fulfilling the essential duties or requirements attending the exercise of the right because of disability.

Accommodation

(2) No tribunal or court shall find a person incapable unless it is satisfied that the needs of the person cannot be accommodated without undue hardship on the person responsible for accommodating those needs, considering the cost, outside sources of funding, if any, and health and safety requirements, if any."

Policy on ableism and discrimination based on disability

[Policy on ableism and discrimination based on disability | Ontario Human Rights Commission](#)

"Although the person seeking accommodation has a duty to assist in securing appropriate accommodation that will meet their needs, they are not responsible for originating a solution or leading the accommodation process. They are also not required to discuss their disability-related needs with anyone other than the people directly involved in the accommodation process. It is ultimately the accommodation provider's responsibility to implement solutions, with the co-operation of the person seeking accommodation. After accommodation is provided, the person receiving the accommodation is expected to fulfil the essential duties or requirements of the job, tenancy, or taking part in a service."

Accessibility for Ontarians with Disabilities Act

[Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 "](#)

Definitions:

"barrier" means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice; ("obstacle")

"disability" means,

(a) 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 animal or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental impairment or a developmental disability,
 - (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
 - (d) a mental disorder, or
 - (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997; ("handicap")

Regulation: Integrated Accessibility Standards

[O. Reg. 191/11: INTEGRATED ACCESSIBILITY STANDARDS"](#)

Part I: General

2. Definitions

"obligated organization" means the Government of Ontario, the Legislative Assembly, a designated public sector organization, a large organization and a small organization;

"small organization" means an organization with at least one but fewer than 50 employees in Ontario, other than the Government of Ontario, the Legislative Assembly or a designated public sector organization.

Part IV.2: Customer Service Standards

80.45 "The standards set out in this Part apply to obligated organizations that are providers of goods, services or facilities."

80.46

(1) In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities.

(2) The provider shall use reasonable efforts to ensure that the policies are consistent with the following principles:

1. The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities.
2. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities.
3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities.
4. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability.



80.47

(1) This section applies if goods, services or facilities are provided to members of the public or other third parties at premises owned or operated by the provider and if the public or third parties have access to the premises.

5. The provider may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, the provider determines that,
 - (a) a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and
 - (b) there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.
6. If an amount is payable for a person's admission to the premises or in connection with a person's presence on the premises, the provider shall ensure that notice is given in advance about the amount, if any, payable in respect of the support person.
7. If, under subsection (5), the provider requires a person with a disability to be accompanied by a support person when on the premises, the provider shall waive payment of the amount, if any, payable in respect of the support person's admission to the premises or in connection with the support person's presence on the premises.

80.49

(1) In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities:

1. Every person who is an employee of, or a volunteer with, the provider.
2. Every person who participates in developing the provider's policies.
3. Every other person who provides goods, services or facilities on behalf of the provider.

(2) The training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters:

1. How to interact and communicate with persons with various types of disability.
2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability.
4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.

(3) Every person referred to in subsection (1) shall be trained as soon as practicable..

(4) Every provider shall also provide training on an ongoing basis in respect of any changes to the policies described in section 80.46.