Accessibility Policy

Category: Operations & Governance

Approval: Board of Governors

Responsibility: Human Rights Advisor

Date Approved: March 2010; revised April 3, 2012; substantially revised for Integrated Standards Regulation in March 2013; December 2016

Definitions:

Accessibility: The degree to which people with disabilities can access a device, service or environment without barriers. Accessibility is also a process – it is the proactive identification, removal and prevention of barriers for people with disabilities to increase accessibility for all. Accessibility is related to but distinct from the concept of accommodation under Ontario's Human Rights Code which provides an individual complaint mechanism to address issues of discrimination.

Accessible Formats: Formats that are alternatives to standard print (e.g., Braille, HTML, MS Word, large print, recorded audio, and electronic formats).

Accommodation: Accommodation is different from accessibility. It is a reactive and individualized adaptation or adjustment made to provide a person with a disability with equitable and non-discriminatory opportunities for participation. It has its basis in anti-discrimination laws.

Communication Supports: Methods to assist communication (e.g., text transcripts of visual and audio information, reading written information aloud to a person directly, exchanging hand-written notes, providing a note-taker or communication assistant, captioning or audio description, assistive listening systems, augmentative and alternative communication methods and strategies such as a picture board or device that speaks out messages, sign language interpretation and intervenor services, repeating, clarifying or restating information).

Disability:

a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, 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 development disability;

c) a learning disability, or 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.

Kiosk: An interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

Personal Assistive Device: Any device that is used, designed, made or adapted to assist a person with a disability in performing a particular task such as moving communicating, reading or lifting. Personal assistive devices cover a broad range of products including wheelchairs, power chairs, walkers, white canes, active listening devices, microphones, oxygen tanks, computers (including laptops), smartphones, and global positioning systems.

Service Animal: Any animal used by a person with a disability for reasons relating to the disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability (e.g. a "guide dog" as defined in the Blind Persons' Rights Act); or where the person provides documentation from a regulated healthcare professional confirming that the person requires the animal for reasons relating to his or her disability.

Support Person: An individual who accompanies a person with a disability in order to assist him or her with communication, mobility, personal care, medical needs, or with access to goods or services.

Purpose/Reason for Policy:

To provide educational and administrative services in a learning, working, and living environment that is accessible to all people who engage in university functions; and to incorporate the principles of independence, dignity, integration and equality of opportunity in all aspects of the University's provision of goods and services and to achieve service excellence to people with disabilities

Scope of this Policy:

This policy applies widely across university operations, services and functions. The accessible service provisions of the policy specifically apply to all staff (including student employees), faculty, volunteers and persons who provide goods, services or facilities on behalf of the university.

Statement of Commitment:

Trent University's mission includes encouraging and celebrating excellence and innovation in teaching, learning, research and student development as well as promoting a culture which engages all members of the Trent community, favours dialogue and collegiality, and nurtures a sense of belonging.

In fulfilling its mission, the University strives at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities. The University is committed to giving people with disabilities the same opportunity to access our goods and services and allowing people with disabilities to benefit from the same services, in the same place and in a similar way as others benefit. This includes the provision of integrated services unless an alternate measure is necessary to enable a person with a disability to obtain, use or benefit from goods or services.

The University is committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA).

Policy Statement:

The University will carry out its functions and responsibilities in the areas that follow. Provisions not in effect as of October 19, 2016are identified in bold with the future compliance date - e.g., [in effect January 1, 2017]. Complementary provisions may be added to existing University policies and procedures.

Communication

The University is committed to communicating with people with disabilities in ways that take into account their disability. The University will provide training and information to employees who communicate with service users on how to interact and communicate with people with various types of disabilities.

Personal Assistive Devices and Other Measures

The University is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from the goods and services we provide. The University will ensure that service-providers are trained and familiar with various assistive devices that may be used by people with disabilities while accessing our goods and services.

The University will also ensure that designated staff are familiar with the assistive devices/services available at the University for people with disabilities.

A person with a disability may provide their own assistive device. Exceptions may occur where the University determines that the device may pose a health and safety risk. In such a situation, the University may offer other reasonable measures to assist the person with a disability to assist him or her in obtaining, using and benefiting from the University's goods and services. There are circumstances under which assistive devices may be made available by the University (e.g. loans to students from the Disability Services Office).

It is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

Service Animals

The University is committed to welcoming people with disabilities who are accompanied by a service animal to all areas on campus except where excluded by law for reasons of health or safety (e.g. food preparation areas). The University will ensure that service-providers are trained in how to interact with people with disabilities who are accompanied by a service animal.

In the event that the presence of a service animal restricts the ability of another person to access an area (e.g. severe allergy) the University will consult with the people involved and devise an accommodation plan that enables all individuals access to goods and services accordingly.

It is the responsibility of the person with a disability to ensure that a service animal is cared for and supervised. The animal must be under the person's full control as appropriate to the disability.

Support Persons

The University is committed to welcoming people with disabilities who are accompanied by a support person. If a person with a disability requires a support person, the support person will be granted access to all venues, including but not limited to, classrooms, athletics, public events, and residences.

The support person will not be charged fees to access these venues with the exception of being required to pay tuition if the support person wishes to obtain academic credit for participation in classes attended in the role of a support person.

The University may require a person with a disability to be accompanied by a support person while on university premises if accompaniment is necessary to protect the health and safety of the person with the disability or the health and safety of others. Before making a decision on the need to require a support person, the University will consult the person with a disability in order to understand their needs, consider health or safety reasons for this requirement based on available evidence and determine if there is no other reasonable way to protect the health or safety of the person with a disability or others on the premises. If it is determined by the University that a support person is required, the University will waive any tuition, admission fees or fare for the support person.

Notice of Temporary Disruptions

Notice of temporary disruptions of University facilities or services usually used by people with disabilities will be provided as far in advance, or as soon as possible, as is reasonable in the circumstances, and will include:

- The reason for the disruption;
- The anticipated duration of the disruption; and
- Information identifying alternative facilities or services as may be available.

Disruption notice(s) will be placed in relevant conspicuous location(s) on the university premises and, where appropriate, will be posted to the University's Service Disruption webpage.

Training: Accessible Service

It is the responsibility of the University to deliver training regarding Accessible Customer Service to all members of the organization. Training will include a review of the purposes of the AODA and the requirements of the Customer Service Standard, and will include instruction in the following:

(a)   How to interact and communicate with people with various types of disabilities;
(b)   How to interact with people 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;
(c)   How to use equipment or devices available on the University's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability; and
(d)   What to do if a person with a particular type of disability is having difficulty accessing the University's goods or services.

It is the responsibility of individuals in the above groups to affirm and promote Accessible Service by engaging in training appropriate to their role and actively identify and work to remove barriers to accessibility.

New staff and faculty will undertake training as part of their orientation. On-going training will be provided regarding changes to policy regarding accessible service.

The Centre for Human Rights, Equity & Accessibility will maintain records of training and will periodically follow up with units to ensure that training requirements have been met.

Training: Educators

It is the responsibility of the University to provide educators with accessibility awareness training related to accessible program or course delivery and instruction.

The Centre for Human Rights, Equity & Accessibility will maintain records of training, including the dates on which training was provided and the number of individuals to whom it was provided.

For the purpose of this section, Educator is defined as an instructor or other employee involved in program or course design, delivery and instruction.

Training: Integrated Accessibility Standards and Human Rights Code [in effect January 1,2017]

It is the responsibility of the University to ensure that appropriate training is provided, as soon as practicable, on the Integrated Accessibility Standards, and on the Human Rights Code as it pertains to persons with disabilities, to all staff, faculty, volunteers, persons who participate in developing the organization's policies and persons who provide goods, services or facilities on behalf of the organization. Ongoing training will be provided regarding changes to policy regarding the Integrated Accessibility Standards.

The Centre for Human Rights, Equity & Accessibility will maintain records of training, including the dates on which training was provided and the number of individuals to whom it was provided.

Accessibility Plan

It is the responsibility of the University to establish, implement, maintain and document a multi-year Accessibility Plan which outlines Trent's strategy to prevent and remove barriers and meet requirements under the Integrated Accessibility Standards. The Accessibility Plan will be posted on Trent's website and provided on request in an accessible format.

Status reports on the progress of measures taken to implement the Accessibility Plan will be prepared annually, posted on Trent's website and provided on request in an accessible format. The Accessibility Plan will be reviewed and updated at least once every five years.

Procuring or Acquiring Goods, Services or Facilities

The University will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so in which case it will provide, upon request, an explanation.

Self-Service Kiosks

The University will specifically incorporate accessibility features when designing, procuring or acquiring self-service kiosks.

Accessible Websites and Web Content [January 1, 2021 (Phase II)]

The University will make its internet and intranet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 as follows:

Phase I: to Level A for new internet websites and web content on those sites.

Phase II: to Level AA for all internet websites and web content other than success criteria 1.2.4 (Live Captions) and 1.2.5 (Pre-recorded Audio Descriptions).

Except where meeting the requirement is not practicable, this section applies to websites and web content, including web-based applications that the University controls directly or through a contractual relationship that allows for modification of the product and to web content published on a website after January 1, 2012.

In determining whether meeting the requirement is practicable the University may consider, among other things, the availability of commercial software or tools or both; and significant impact on an implementation timeline that is planned or initiated before January 1, 2012.

Accessible Formats and Communication Supports

The University will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account a person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons. The University will consult with the person making a request to determine the suitability of an accessible format or communication support.

This requirement applies only to information and communications that the University controls directly or indirectly through contractual relationships. It does not apply to information the University is sharing on behalf of another organization. Where the University determines it is unable to convert information into an accessible format an accessible summary of the content will be provided to the requesting person with an explanation as to why an accessible format was not achievable.

Feedback Processes - General

The University will ensure that feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports upon request.

Emergency Procedures, Plans or Public Safety Information

The University will provide emergency procedures, plans or public safety information available to the public in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Educational and Training Resources and Materials

On notification of need, the University will provide:

i. Educational or training resources or materials in an accessible format that takes into account the person's accessibility needs by procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of the resources/materials where available, and if not available arranging for the provision of a comparable resource in an accessible or conversion ready electronic format.
ii. Student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities.

Where Producing Educational or Training Material - Textbooks [in effect January 1, 2015] and Printed Supplementary Materials [in effect January 1, 2020]

The University will, on request, make accessible or conversion ready versions of textbooks or supplementary print-based learning material produced by and available to the University.

Where the University determines it is unable to convert information, in whole or part, into an accessible format, an accessible summary of the content will be provided to the requesting person with an explanation as to why an accessible format was not achievable.

Libraries of Educational and Training Institutions – Print-based Resources/Materials and Digital/Multimedia Resources/Materials [in effect January 1, 2020]

Where available, the University's libraries shall provide, procure or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request. Exempted from this requirement (though not exempted from a duty to accommodate under the Human Rights Code) are special collections, archival materials, rare books and donations.

Where a library learns that the requested materials or resources are unconvertible, an accessible summary of the content will be provided to the requesting person with an explanation as to why the resource/material could not be provided.

Employment Standard

The University is required to provide for accessibility across all stages of the employment life cycle in accordance with the Employment Standard provisions of the Integrated Accessibility Standards, including:

- Providing notification that accommodations are available on request at recruitment, assessment and selection stages;
- Notifying individuals considering offers of employment as well as existing employees of the University's Accommodation Policy for Employees and notifying employees when changes to the Policy are made;
- Providing accessible formats and communication supports to employees on request where needed to perform job functions or where information is generally available to employees;
- Developing and having in place a written process for the development of documented individual Accommodation Plans with mandated elements;
- Working with employees with disabilities to develop individual Accommodation Plans;
- Developing and having in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation to return to work;
- Taking into account accessibility needs for the performance management process, when providing career development / advancement and when employees with disabilities are redeployed.

Workplace Emergency Response Information

The University is required to provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the University is aware of the need for accommodation due to the employee's disability. The information required shall be provided as soon as practicable after the University becomes aware of the need for accommodation.

Where an employee would require assistance in an emergency, with the consent of the employee, information will be provided to the person designated by the employer to provide assistance to the employee. Workplace emergency response information shall be reviewed when an employee moves

to a different location, when the employee's overall accommodation needs or plans are reviewed and when the University reviews its general emergency response policies.

Availability and Format of Documents

This policy will be made available to all members of the University community on the Trent University portal and will be visible to all campus visitors on the Trent University website.

The University will prepare one or more documents describing this Policy and will provide same on request to any person. If a request is made by or on behalf of a person with a disability, the University will provide the document(s) in a timely manner in a format that takes into account the person's disability.

Specific Feedback Process

The University is committed to providing high quality goods and services to all members of our community and the broader public we serve. Feedback is welcomed as it may identify areas that require changes and encourage continuous service improvements.

The University will create and maintain a readily available feedback process so that members of our community and the public are able to comment on the provision of goods and services to people with disabilities and accessibility issues generally. The University will ensure that persons with disabilities can provide feedback by ensuring accessibility of feedback processes including providing or arranging for accessible formats and communication supports, upon request.

The feedback process will allow for comments to be communicated in various formats including in person, by telephone, and in writing by mail or email. Where possible feedback will be addressed immediately and otherwise will be responded to as appropriate within a reasonable timeframe. Where appropriate, the University will take feedback received into consideration as part of policy review processes.

On-Going Compliance Monitoring and Reporting

The University's Accessibility Subcommittee will provide an annual report on the implementation of this policy to the Presidential Advisory Committee on Human Rights, Equity & Accessibility (PACHREA).

Responsibilities:

Recognizing that accessibility is everyone's responsibility, all staff (including student employees), faculty, volunteers and persons who provide goods, services or facilities on behalf of the university are responsible for providing accessible service in accordance with the general service provisions of this policy. These groups, as well as individuals responsible for developing the university's policies, are responsible to undertake the training set out in the policy as applicable.

Supervisors are responsible for working with the Centre for Human Rights, Equity & Accessibility to encourage training participation and confirm training records.

Supervisors are responsible for providing individualized workplace emergency response information with the assistance and support of the Centre for Human Rights, Equity & Accessibility and Risk Management Department.

Individual departments / units are responsible for meeting the policy requirements in their area of mandate (e.g., Purchasing Department re: procurement, Information and Communications Department re: website, Human Resources re: Employment) with the assistance and support of the Centre for Human Rights, Equity & Accessibility.

The Centre for Human Rights, Equity & Accessibility has overall responsibility for providing support and ensuring compliance with the Policy and the requirements of the AODA.

Contact Officer:
Institutional Accessibility Advisor

Date for Next Review:
October, 2018

Related Policies, Procedures & Guidelines
    a) Accommodation for Students with Disabilities
    b) Accommodation for Employees with Disabilities

Policies Superseded by This Policy:
    a) Accessible Customer Service Policy
    b) Policy on Persons with Disabilities