

Number:	RHR-223
Title:	Accessibility
Person responsible for enforcement:	Secretary General
Entered into force:	May 30, 2018
Approved:	May 30, 2018 by the Board of Governors
Revision approved:	June 19,2024, by the Board of Governors <i>This document replaces all previous regulations on this subject.</i>
Frequency of revision:	This policy is reviewed at least once a year by Human Resources Services
Exception:	No exception to this regulation without prior written authorization from the Board of Governors

1. Statement

Saint Paul University is committed to providing goods and services in a manner that respects the dignity and autonomy of each member of the administrative staff, teachers, student population as well as visitors. It is committed to adapt all goods and services to the needs of disabled persons and ensure that they enjoy free and unhindered access to goods, services, facilities, housing, communications and jobs at the University.

The University promotes open communication with persons with disabilities to meet their needs. To this end, full-time and part-time staff are required to undergo training to inform them on how to provide customer services to persons with disabilities.

2. Legal framework

This regulation complies with the principles of:

- the *Canadian Charter of Rights and Freedoms*;
- the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and the *Accessibility Standards for Customer Service* of Ontario Regulation 191/11 and - Integrated Accessibility Standards;
- Regulation 332/12 - *Ontario Building Code Act, 1992*;
- *The Ontario Human Rights Code*.

3. Scope

This regulation sets out the minimum requirements necessary to create an inclusive workplace and governs the provision of services offered by the University while respecting the dignity and autonomy of persons with disabilities. These regulations shall apply to all full-time and part-time staff, members of the Board of Governors, volunteers and other persons who deal with the public or other third parties on behalf of the University.

4. Amendments to this regulation

The University is committed to developing regulations on customer services that respect and promote the dignity and independence, integration and equal opportunity for disabled persons. Therefore, no changes will be made to this regulation without prior examination of its potential impact on persons with disabilities.

5. Definitions

This regulation conforms to certain writing conventions that determine the extent to which expressions are mandatory or optional. The following terms are accompanied by specific obligations and requirements:

- **Must:** this requirement is not optional.
- **Should:** The task performer must choose this action unless the business functionality indicates otherwise. Exceptions must be approved by the Vice-Rector Administration.
- **May:** The task performer has the option to select one or more of the proposed options, but must select one or more of them, as stated in the context of the element.

The verb 'to understand' and the preposition 'including', when used, are not exclusive. They mean, respectively, "to understand" and "without limits."

Disability:

Includes:

- any degree of physical disability, infirmity, malformation or disfigurement;
- an intellectual or developmental disability;
- a learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder;
- an injury or disability for which benefits have been claimed or received under the insurance parameters established under the *Workplace Safety and Insurance Act, 1997*.

Covers:

- disabilities of varying severity;
- visible and invisible disabilities;
- disabilities whose effects can appear and disappear.

Service animals: There are no restrictions on the type of animal that can be used as a service animal. The following conditions must be met for a service animal to be considered as such:

- the animal must wear a harness, vest or other visual indicator;
- the person with the disability must provide the relevant documents issued by a member of a regulated profession.

Guide dog: Has the same meaning as 'guide dog' in section 1 of the *Blind Persons' Rights Act*.

Support person: A person who accompanies a person with a disability to help with communication, mobility, personal care, medical needs or to facilitate access to goods or services.

6. Requirements

University staff must be aware of the provisions of the *Ontario Human Rights Code* and the AODA that apply to the University and the services it provides.

7. Training

Training is an important part of implementing the AODA. It raises staff awareness of the needs of persons with disabilities and explains how and why to meet them.

All University staff, volunteers, agents and decision-makers will require training on:

- the requirements of the AODA and its accessibility standards that apply to the University;
- customer services;
- accessible information and communication, including websites;
- information on emergency response in the workplace;
- obligations under the *Ontario Human Rights Code* (regarding disabilities).

8. Areas and services covered

8.1 Assistive devices

The University is committed to providing a service to persons living with a disability who require the use of assistive devices in order to receive, use or benefit from its goods and services. It will ensure that members of staff are trained and familiar with the various assistive devices that may be used by persons living with a disability.

8.2 Support person

- a) Any person with a disability may be accompanied by a support person on University property. The disabled person must not be deprived of any access to the support person when on the premises, provided that their interaction does not compromise academic integrity, for example, by eliminating or reducing in any manner essential courses or program requirements.
- b) When admission fees are required for a support person, the administrative unit shall provide and display the amount payable on its website, in its brochures or other means of public release.

8.3 Service animals

The University is committed to welcoming persons with disabilities who are accompanied by a service animal in areas open to the public. Staff members and others who may deal with the public will receive appropriate training on how to interact with persons living with a disability who are accompanied by an assistance animal. If a legal prohibition makes it impossible for service animals to access the University's work areas or facilities, an adapted service will be provided.

8.4 Information on the emergency plan

The University undertakes to provide its community with the emergency plan for the public on request and in an accessible format. It will also provide individualized information on the emergency plan to members of staff with disabilities.

8.5 Feedback process

The University welcomes comments on how it provides goods and services to persons with disabilities. All comments will be forwarded to Human Resources Services. Clients can expect to receive a response within five (5) working days after receipt of comments by the University.

The University's aim is to meet expectations in terms of customer service when dealing with persons with disabilities, as well as the accessibility of its digital products. It welcomes feedback on how it provides its services to persons with disabilities. All comments will be forwarded to the Human Resources Services. Customers can expect a response within five working days of receiving feedback.

8.6 Information and communication

The University's staff must communicate with persons with disabilities in ways that take into account their disability. The University trains its staff on how to interact and communicate with persons with various types of disabilities.

Telephone services: The University offers telephone services to its customers using the Bell Canada relay service if required. The University informs staff members on how to communicate with persons by telephone in clear and simple language.

Written documents: The University provides documentation on its policies and procedures concerning its customer service at the request of its customers, staff members or any other

person living with a disability. The University provides its policies and procedures relating to its accessibility standards in an alternative format by mutual agreement between the University and the person with a disability. It will answer any questions customers may have about the content of these policies and procedures by telephone, e-mail or in person.

Accessible format and communication aids: When someone requests information about the University or its services, this information will be provided in accessible formats or with communication aids.

Accessible website and web content: The University's website must meet the requirements of the internationally accepted WCAG 2.0 standards. The University is committed to developing all its web content according to the WCAG 2.1, level AA accessibility standards defined by the World Wide Consortium (W3C), as required by the AODA.

8.7 Staff awareness and training

The University ensures that all relevant staff receive the necessary training to create accessible web content and are aware of the various assistive devices on site or that persons with disabilities can use to access goods, services or facilities.

8.8 Notice of temporary disruption of service

The University gives notice in case of disruptions, planned or unplanned, of facilities or services that may be used by persons with disabilities. These disturbances include shutdown of elevators, areas subject to repairs or maintenance, access routes and devices.

The notice will specify the reason for the disruption and anticipated duration and will describe alternative facilities or services, if any, as well as access routes to take to get to these facilities and alternate services. The notice shall be placed in prominent locations on campus and, if necessary, posted on the website.

8.9 Procurement

When procuring goods or services, the University must ensure that accessibility criteria and features are properly considered.

8.10 Employment

Notification of recruits and successful applicants: Staff, prospective recruits and the public should be informed of accommodations that may be available during recruitment and hiring.

Information on supports: Staff should be informed that supports are available for persons with disabilities.

Individual accommodation plans: A process for developing individual accommodation plans for staff members is implemented. Individual accommodation plans are developed in consultation with the person with the disability.

Performance management: Performance management, career development and redeployment processes must take into account the accessibility needs of all staff.

Return to work processes: The return to work process following sick leave shall provide an opportunity for the employee with a disability to demonstrate that they are capable of performing the essential duties of the position after accommodation.

Work Environment: The University shall endeavour to establish, encourage and maintain a work environment that respects employees with disabilities and their rights.

8.11 Built environment and public spaces

Service counters: The University will ensure that all new service counters and all replacements of existing counters are adapted for mobility aids and comply with the *Integrated Standards Regulation* and the *Ontario Building Code*.

Waiting areas: The University will ensure that any newly constructed waiting or reception area is accessible to persons using a mobility aid and complies with the *Integrated Standards Regulation* and the *Ontario Building Code*.

Parking: The University will ensure that parking spaces are accessible to persons with disabilities and comply with the *Integrated Standards Regulation* and the *Ontario Building Code*.

Construction and fitting out and refitting of premises: The University undertakes to comply with the accessibility requirements of the *Ontario Building Code* when constructing, renovating, fitting out or refitting its premises.

Maintenance: The University establishes preventive and emergency maintenance instructions for accessible elements in its built environment and public spaces.

Disruptions: The University establishes measures to deal with temporary disruptions resulting from the non-functioning of accessible elements required by the Act.

8.12 Accessibility Plan

The University is committed to developing a multi-year accessibility plan setting out the steps it will take to comply with Ontario's accessibility legislation and to identify, prevent and remove barriers to accessibility.

8.13 Administration

Human Resources Services is responsible for documenting the application of this policy in accordance with applicable laws and regulations. All staff members are responsible for knowing or following the requirements of this policy in order to provide inclusive and accessible services and interact with their colleagues. Concerns must be reported appropriately and in a timely manner in accordance with protocols.

9. References

- Multi-year plan
- Accessibility compliance report

Rector's signature:

Date:

Note: To obtain a signed copy of this document, please send a request to the General Secretariat at sec_gen@ustpaul.ca.