



Policy: **INTEGRATED ACCESSIBILITY STANDARDS REGULATION**

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Approved By: Vice President, Finance & Administration

## **POLICY STATEMENT AND ORGANIZATIONAL COMMITMENT**

Huron University College (“Huron”) is committed to working towards being compliant with all the standards in the *Accessibility for Ontarians with Disabilities Act* (“AODA”) and *Integrated Accessibility Standards Regulation*, O. Reg. 191/11 (“IASR”). Huron recognizes the importance of developing, implementing and enforcing standards in a timely manner in order to achieve accessibility for Ontarians with a disability. Huron is committed to the principles of independence, dignity, integration and equality of opportunity described in the AODA and IASR and to meeting the needs of people with disabilities through the implementation of this policy. Huron is committed to excellence in serving its community, including persons with disabilities. When providing information to, or communicating with a person with a disability, Huron will provide information and communication in a manner that takes into account the person’s disability.

## **PURPOSE**

The purpose of this policy is to serve as a statement of institutional commitment that provides a framework within which accessibility plans and initiatives are to be created. Huron is committed to moving the institution towards the goal of improved accessibility for people with disabilities in a timely manner. The commitments in the policy are intended to ensure that accessibility remains a priority for Huron in its decision-making processes and will serve to assist in ensuring that decisions improve accessibility and do not inadvertently create barriers.

## **SCOPE AND RESPONSIBILITIES**

This policy has been drafted in accordance with the AODA and IASR and addresses how Huron will meet the regulatory requirements to achieve accessibility with respect to information and communications standards, employment standards, transportation standards and public spaces standards. This policy provides the overall direction that Huron will follow to provide accessibility supports to Ontarians with disabilities.

Please note that Huron has a separate policy that deals exclusively with customer service standards. For more information regarding customer service standards, please see Huron’s “Integrated Accessibility Standards- Customer Service Policy”.

Except as otherwise provided in this policy, this policy applies to all members of the Huron Community, which includes, without limitation, employees, staff, faculty, students, volunteers, applicants for employment, contractors, and other individuals who live, work, or visit the Huron campus.

## **GENERAL PROVISIONS**

This section covers the general requirements of the *IASR*.

### **1. Multi-year accessibility plan**

Huron will establish, implement, and maintain a multi-year accessibility plan, which outlines its strategy to prevent and remove barriers and meet its requirements in a timely manner. The multi-year accessibility plan will indicate how Huron intends to implement the requirements of the *IASR* within the legislated timelines. It will also address the identification, removal and prevention of barriers to the Huron Community. As an affiliate of Western University, Western's multi-year accessibility plan may be consulted. The plan will be reviewed and updated at least once every five years. Huron will also prepare and post on its website an annual status report outlining its progress. Upon request, Huron will provide individuals with a copy of its annual status report in an accessible format.

Huron's multi-year accessibility plan and annual status report can be found on Huron's Accessibility webpage at: <https://huronatwestern.ca/about/accessibility/>.

### **2. Procuring or acquiring goods, services or facilities**

Huron will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practical to do so, in which case, if requested we will provide an explanation.

### **3. Self-service Kiosks**

Huron will incorporate accessibility features and consider accessibility for people with disabilities when designing, procuring or acquiring self-service kiosks.

### **4. Training**

Huron will ensure that training is provided to all employees, volunteers, staff and faculty on the requirements of the accessibility standards referred to in the *IASR* and in the *Human Rights Code* as it pertains to persons with disabilities. Training will be provided as soon as practical. If any changes are made to this policy or the requirements, Huron will provide retraining opportunities for individuals as necessary. Huron shall maintain a record of the dates training was provided and the number of individuals to whom it was provided.

## **INFORMATION AND COMMUNICATIONS STANDARD**

Huron will create, provide and receive information and communications in ways that are accessible to persons with disabilities. If Huron determines that it is not technically able to convert the information or communications, or the technology to convert the information or communication is not readily available, Huron will provide the person that requires the information an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

## **1. Feedback**

Upon request, Huron will provide or will arrange for the provision of accessible formats and communication supports in its feedback processes to ensure that these processes are accessible to persons with disabilities in a timely manner. Huron will notify the public about the availability of accessible formats and communication supports.

## **2. Accessible formats and communication supports**

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

## **3. Emergency information**

Huron will provide or make arrangements for accessible formats and information and communication supports of the emergency response plan and safety information, as soon as practicable, upon request. Huron will make this information available in a timely manner that takes into account the person's accessibility needs due to disability.

## **4. Website accessibility**

Huron shall make their internet website and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2021 all internet website and web content will conform to WCAG 2.0 Level AA.

## **5. Educational and training resources and materials**

Upon request, Huron shall provide educational or training resources or materials in an accessible format that takes into account the accessibility needs of the person with a disability to whom the material is to be provided by:

- i. procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or
- ii. arranging for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources or materials cannot be procured, obtained by other means or converted into an accessible format.

Additionally, Huron shall provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities.

## **6. Training to educators**

Huron will train faculty members on the topic of accessibility awareness related to providing accessible programming, course delivery and instruction. Huron shall maintain a record of the dates training was provided and the number of individuals to whom it was provided.

## **7. Libraries**

Upon request and if not exempt under the *IASR*, any library operated by Huron 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.

## **EMPLOYMENT STANDARD**

Huron is committed to ensuring that people with disabilities have the same opportunity of access to employment opportunities. Huron is committed to meeting the accessibility needs of people with disabilities, in a timely manner, in its human resources practices, processes, policies and procedures and employment related services. This policy applies in respect to all applicants, prospective staff and faculty, and current staff and faculty, but does not apply to volunteers and other non-paid individuals.

### **1. Recruitment**

Huron shall notify all applicants, prospective staff and faculty, and current staff and faculty about the availability of accommodations for applicants with disabilities as per three (3) items below:

1. Provide a statement on all internal and external job postings that suitable accommodation that takes into account the applicant's disability is available at the applicant's request;
2. If a selected applicant requests an accommodation, Huron shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability; and
3. Notify successful applicants of the policies for accommodating staff and faculty with disabilities.

Huron shall inform staff and faculty of its policies used to support staff and faculty with disabilities, including but not limited to, information on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. Huron shall provide information required under this section to new staff and faculty as soon as practical after they begin their employment and whenever there is a change to existing information on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

### **2. Accessible formats**

Where a staff or faculty member of Huron makes a request, Huron will consult with the staff or faculty member to arrange for the provision of accessible information and communication supports for the information that is needed to perform their job as well as information that is generally available to staff and faculty at Huron. The information will be provided in a timely

manner and provided in a format that takes into account the staff or faculty member's disability needs.

### **3. Workplace emergency response information**

An employee who has a disability shall be provided with individualized workplace emergency response information as soon as practicable if the disability is such that the individualized information is necessary and Huron is aware of the need for accommodation due to the staff or faculty member's disability. If a staff or faculty member who receives individualized workplace emergency response information requires assistance, with the staff or faculty members consent, Huron shall provide the workplace response information to a person designated by Huron to provide assistance to the staff or faculty member. A review of the individualized workplace emergency response information will occur if the staff or faculty member moves to a different location on campus, when overall accommodations needs or plans are reviewed and when Huron reviews its general emergency response policies.

### **4. Individual accommodation plan (IAP)**

Huron shall have in place a written process for the developing a documented IAP for staff or faculty with a disability. The process for the development of documented IAP shall include the following elements:

1. The manner in which a staff or faculty member requesting accommodation can participate in the development of the IAP;
2. The means by which the staff or faculty member is assessed on an individual basis;
3. The manner in which Huron can request an evaluation by an outside medical or other expert, at Huron's expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved;
4. The manner in which the staff or faculty member can request the participation of a representative from their bargaining agent, where the staff or faculty member is represented by a bargaining agent, or other representative from the workplace, where the staff or faculty member is not represented by a bargaining agent, in the development of the IAP;
5. The steps taken to protect the privacy of the staff or faculty member's personal information;
6. The frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
7. If an IAP is denied, the reasons for the denial will be provided to the staff or faculty member;
8. The means of providing the IAP in a format that takes into account the staff or faculty member's accessibility needs due to disability;

9. A documented IAP shall,

- (a) if requested, include any information regarding accessible formats and communications supports provided, as described in subsection 2 above;
- (b) if required, include individualized workplace emergency response information, as described in subsection 3 above; and
- (c) identify any other accommodation that is to be provided.

## **5. Return to work**

Huron is committed to the provision of workplace rehabilitation that support and enable injured and sick staff and faculty members to remain at, or return to Huron to perform the duties of their jobs. Huron will have in place a return to work process for staff or faculty members who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes will be documented and must outline the steps that Huron will take to facilitate the return to work and include an individual accommodation plan.

## **6. Performance management**

Huron is committed to removing barriers for staff and faculty members with disabilities and takes into account the accessibility needs of staff and faculty with disabilities, as well as individual accommodation plans, throughout its performance management, feedback, and evaluation processes.

## **7. Career development and advancement**

Career development and advancement applies to all staff and faculty members and imposes obligations on individuals to develop and on Huron to support that development in ways that are consistent with the needs of the staff and faculty member as well as Huron's needs and objectives. The principles of equal opportunity and reasonable accommodation are essential characteristics of career development and advancement at Huron. Huron will take into account the accommodation needs and / or IAP of staff and faculty with regards to career development and advancement.

## **8. Redeployment**

Where it is necessary to make a position redundant, Huron will seek to redeploy staff and faculty members into suitable alternative vacancies, taking into account the knowledge, skills, abilities and other attributes required to perform that work. Huron will take into account the accommodation needs and/or IAP of staff and faculty with regards to redeployment.

## **TRANSPORTATION STANDARD**

The Transportation Standard will make it easier for people to travel in Ontario, including persons with disabilities, older Ontarians and families traveling with children in strollers. The Transportation Standard does not apply to Huron as an institution, but we will inform staff or faculty members through training about its impact and benefits to the community for people with disabilities.

## **PUBLIC SPACES**

Huron shall incorporate accessibility into public spaces that are newly constructed or redeveloped on and after January 1, 2016. Any newly constructed or redeveloped public spaces will follow the existing requirements stated under the *IASR* for the Built Environment for recreational trails and beach access routes, outdoor public use eating areas, outdoor play spaces, exterior paths of travel, accessible parking, and service-related elements. Huron will provide maintenance and restoration of public spaces, where applicable, by ensuring that the multi-year accessibility plan includes procedures for preventative and emergency maintenance of accessible elements in public spaces and procedures for dealing with temporary disruptions when accessible elements required under this section are not in working order.

## **REGULATORY REQUIREMENTS**

The *AODA* allows a ministry director or a designate to issue an order against a person, organization or corporation to pay a monetary penalty for any violation of the *AODA* or *IASR*. Use of administrative monetary penalties will be considered an avenue of last resort when all other compliance assistance and improvement options have been exhausted. The License Appeal Tribunal will hear appeals from organizations of director's orders, but not individual complaints. Individuals who feel that the *AODA* has been violated by should continue to seek recourse through the Ontario Human Rights Commission.

## **EVALUATION**

This policy will be reviewed as required in the event of legislative changes or changes to Huron's policy and/or procedures.