



Policy:	<b>INTEGRATED ACCESSIBILITY STANDARDS REGULATION</b>
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Approved By:	Vice President, Finance and 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'). 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 to meeting the needs of people with disabilities through the implementation of this policy. Huron is committed to excellence in serving our community, including persons with disabilities. When providing information to, or communication with a person with a disability, we 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 toward to 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 our 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 written in accordance with the regulation and addresses how Huron achieves accessibility through meeting the regulation's requirements. It provides the overall direction that we will follow to provide accessibility supports to Ontarians with disabilities.

This policy applies to staff, faculty, students, volunteers, applicants for employment, contractors engaged by Huron, and any individuals, who work, study, live or visit the Huron campus.

The requirements of the Regulation include the following four (4) items:

1. Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines Huron's strategy to prevent and remove barriers and meet its requirements under the Regulation;
2. Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities;
3. Training; and

4. Other specific requirements under the Information and Communications, Employment, Transportation and Public Spaces Standards.

## **GENERAL PROVISIONS**

This section covers the general requirements of the Integrated Accessibility Standards Regulation.

### **1. MULTI-YEAR ACCESSIBILITY PLAN**

Huron will establish, implement and maintain a multi-year accessibility plan, which outlines our strategy to prevent and removed 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 Integrated Regulation with the legislated timelines it will also address the identification, removal and prevention or barriers to staff and faculty at Huron. 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.

### **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. TRAINING**

Huron will ensure that training is provided to all staff and faculty on the requirements of the accessibility standards referred to in the regulation and on 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, training will be provided. We shall maintain a record of the dates when training is 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, we 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. EMERGENCY INFORMATION**

Huron will provide or make arrangements for accessible formats and information and communication supports of the emergency response plan and safety information when a person with a disability requests them. Huron will make this information available in a timely manner and at no additional cost greater than the regular price charged to everyone for the same information.

## **2. 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. We will notify the public about the availability of accessible formats and communication supports.

## **3. ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS**

Huron will provide or arrange to provide accessible formats and communication supports for persons with disabilities for the situations 1. through 4. listed below:

1. Upon request and in a timely manner that takes into account the persons' accessibility needs due to a disability;
2. At a cost that is no more than the regular cost charged to other persons;
3. Consult with the person making the request and determine suitability of an accessible format or communication support;
4. Notify the public about the availability of accessible formats and communication supports.

## **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. TRAINING TO EDUCATORS**

Huron will train faculty members of the topic of accessibility awareness related to providing accessible programing and course delivery and instruction.

## **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. It 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;
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 requests it, 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 members disability needs.

## **3. INDIVIDUAL ACCOMMODATION PLAN (IAP)**

Huron shall have in place a written process for the developing a documented individual accommodation plan for staff or faculty with a disability. The process will include, for consideration, the twelve (12) points below:

1. The staff or faculty participation in the development of the IAP;
2. Assessment on an individual basis;
3. Identification of accommodations to be provided;
4. Timelines for the provision of accommodations;
5. Huron may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
6. The staff or faculty member may request the participation of a representative from their bargaining agent, where represented, or otherwise a representative from the workplace not from a bargaining agent;
7. Steps taken to protect the privacy of the staff or faculty member's personal information;
8. Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
9. If denied, the reasons for denial are to be provided to the staff or faculty member;
10. A format that takes into account the staff or faculty members disability needs;
11. If requested, any information regarding accessible formats and communication supports provided;
12. Identification of any other accommodation that is to be provided.

## **4. 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 must be documented and must outline the steps that Huron will take to facilitate the return to work and include an individual accommodation plan.

## **5. 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, when using its performance management process. The performance evaluation program at Huron has been established to enable each staff and faculty member to receive regular feedback on their job performance; to assist them to become for effective in their position, and; to inform the staff or faculty members Leader of their career aspirations.

## **6. 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 individual accommodation plans of staff and faculty with regards to career development and advancement.

## **7. REDEPLOYMENT**

Where is it 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 individual accommodation plans of staff and faculty with regards to redeployment.

## **8. WORKPLACE EMERGENCY RESPONSE INFORMATION**

An employee who has a disability shall be provided with individualized workplace emergency response information 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 members 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 the Huron reviews its general emergency response policies.

## **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 us an institution, but we will inform staff or faculty

member 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 Accessibility Standards 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. We shall provide maintenance and restoration of public spaces, where applicable, by ensuring our 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**

An Administrative Monetary Penalties scheme is being established under the Accessibility for Ontarians with Disabilities Act (AODA). The scheme will allow a director or a designate to issue an order against a person, organization or corporation to pay a penalty amount as a result of non-compliance with the AODA or the accessibility standards. The largest penalty amount that can be issued to an individual or an organization that is not a corporation is \$50,000.

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 (LAT) will hear appeals from organizations of director's orders, but not individual complaints. Individuals who feel their human rights have not been met would continue to complain to the Ontario Human Rights Commission.