



## Accessibility Policy

|   |
|---|
| <b>Policy Title - Accessibility</b>                                       |
| <b>WUSA Policy Number: W-204</b>  |
| <b>Approval Body: Executive Director</b>                                  |
| <b>Responsible Officer(s): Director of Comm and Stakeholder Relations</b> |
| <b>Revised: 03/04/2024</b>  |
| <b>Approved: 30/8/2024</b>  |
| <b>Effective Date. 1/9/2024</b>   |

### 1. Policy Statement

All members of the WUSA community and visitors with disabilities have a right to equitable treatment without discrimination or barriers, with respect to employment, services, goods, and access to facilities, in accordance with the provisions of the *Ontario Human Rights Code* and *Accessibility for Ontarians with Disabilities Act (AODA)*.

### 2. Definitions

The following definitions apply to terms as they are used in this policy.

- 2.01. Accessibility is defined as centering and eliminating barriers by providing specific accommodations; environments, structures and processes.
- 2.02. Barrier: For a person with physical, mental, intellectual, or sensory disability, a barrier is anything that interacts with that disability in a way that may hinder the person's full and effective participation on an equal basis.
- 2.03. Disability: According to the Ontario Human Right Code, disability is defined as:
  - i. 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, 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, wheelchair, or other remedial appliance or device;
  - ii. a condition of mental impairment or a developmental disability;
  - iii. a learning disability or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
  - iv. a mental disorder; or
  - v. an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

## WUSA Accessibility Policy

A disability may be the result of environmental barriers, such as attitudinal barriers, inaccessible information, an inaccessible built environment or other barriers that affect a person's full participation in the educational context.

Service Animal: An animal is a service animal for a person with a disability, if:

- a. it is readily apparent that the animal is used by the person for reasons relating to their disability;  
or
- b. the person provides a letter from a regulated health professional confirming that the person requires the animal for reasons relating to the disability. Any of the following regulated health professionals can provide documentation in support of an individual's need for a service animal:
  - i. Audiologists
  - ii. Speech-Language Pathologists
  - iii. Chiropractors
  - iv. Nurses
  - v. Occupational Therapists
  - vi. Optometrists
  - vii. Physicians
  - viii. Physiotherapists
  - ix. Psychologists
  - x. Psychotherapists
- c. A service animal is not a pet.
- d. Additional procedures may be required to ensure the health and safety of individual departmental areas, including but not limited to The person using a service animal is responsible for effectively controlling it. The service animal's presence, behaviour or actions cannot pose an unreasonable or direct threat to property or the health or safety of others

2.04. WUSA Community: Students, staff, individuals with a university affiliation, post-doctoral fellows, visiting scholars, contractors, volunteers, members of the Board and Senate, and residents of university property.

2.05. Reasonable accommodation: means an accommodation of special needs of any student, if those special needs are based upon a Documented Disability, that is reasonable but not necessarily perfect in the circumstance that it does not cause undue hardship to the organization (WUSA). The organization is under no obligation to offer a Reasonable Accommodation (or any accommodation for that matter) on compassionate or other grounds.

### 3. Scope

3.01. This policy applies to members of the WUSA Community and all visitors on the University campus. This Policy does not replace the University's obligations under the *Ontario Human Rights Code* and *Accessibility for Ontarians with Disabilities Act (AODA)*, nor does it alter the University's obligation to employees with disabilities under any collective agreements.

### 4. Confidentiality

- 4.1. All communication regarding accommodation of employee disabilities shall be confidential and in accordance with WUSA policy and procedures related to Personal Health Information Protection Act (Ontario). However, privacy is not absolute, and exceptions to privacy may apply in limited and specific circumstances.

## 5. Principles

WUSA's services shall be provided to persons with disabilities in accordance with the following key principles:

- i. Dignity – Service is provided in a respectful manner consistent with the needs of the individual.
- ii. Independence – Services for persons with disabilities shall support their independence while respecting their right to safety and personal privacy.
- iii. Integration – Services allow people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers.

## 6. Accessibility Plan

- i. Accessibility criteria and features will be incorporated in our operations and where it is not practical to do so, WUSA will provide a written explanation, if requested, detailing why accessibility criteria could not be incorporated.
- ii. WUSA is committed to fair and accessible employment practices. The public and employees will be notified that, when requested, accommodations will be provided during the recruitment, assessment, and selection processes. WUSA shall consult with the person making the request and gain agreement in determining the suitability of an accommodation request.
- iii. WUSA will provide workplace emergency information and procedures to employees who have a disability and will require assistance in the event of an emergency. An emergency can range from an acute event that requires medical attention to an event such as a fire where special evacuation procedures may be necessary.
- iv. When using performance management, career development and redeployment processes, WUSA will consider the accessibility needs of employees with disabilities.
- v. WUSA is committed to incorporating barrier-free principles in the construction of new facilities and during the renovation of existing structures.
- vi. WUSA will adhere to the principles of respect for dignity, individualised accommodation, integration, and full participation of all people, including persons with disabilities as outlined under the Ontario Human Rights Code and as legislated by the AODA.

## 7. Accessibility Customer Service Training

- I. The People and Culture Coordinator will ensure that trainings are provided to employees, and volunteers who could reasonably be expected to interact with persons with disabilities. Training on accessible customer service will be provided in a variety of formats and will include information on:
  - a. How to interact and communicate with persons with various types of disabilities;
  - b. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or service animal or assistance of a support person;
  - c. How to use equipment or devices available within WUSA's premises 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 WUSA's goods or services.
  - e. New staff, and relevant third parties will be provided with training and/or awareness literature within a reasonable period of time after commencement of their duties at WUSA. Employees

will also be trained on an ongoing basis as changes are made to these policies, practices and/or procedures.

**8. Use of Service Animals**

I. The Manager, Facility Operations & Membership will ensure:

- i. Service animals are permitted in parts of the Student Life Centre that are open to the public and third parties, except in those areas where animals are excluded by law.
- ii. Service animals must at all times remain under the care and control of the person with the disability. The person using a service animal is responsible for effectively controlling it as the service animal's presence, behaviour or actions cannot pose an unreasonable or direct threat to property, health or safety of others.
- iii. Instances where a service animal is unable to access a part of the Student Life Centre, other accommodations may be afforded, such as: delivery of goods or service at an alternate time or location; other assistive measures available to deliver a good or service to ensure equality of outcome with the exception of guide dogs.
- iv. The Health Protection and Promotion Act, Reg 562 s. 60 allows for "a service dog serving as guide for a blind person or for a person with another medical disability who requires the use of a service dog, if the service dog is in the area of the food premise where food is being served or sold.

**9. Notice of Service Disruptions**

I. In the event that a temporary service disruption occurs that would limit a person with a disability from gaining access to facilities, goods or services in the Student Life Centre, WUSA will make the disruption known by posting notices in visible locations close to the service that has been disrupted.

II. All notices of disruption shall include:

- i. The name of the event and/or service.
- ii. Anticipated duration of the disruption (if known).
- iii. The normal service location being impacted.
- iv. Alternative service locations.
- v. Alternative service methods.
- vi. Hours of service availability.
- vii. Contact information.
- viii. Other information suitable to the delivery of a good or service.

**10. References:**

- i. Ontario Human Rights Code <https://www.ontario.ca/laws/statute/05a11?search=disability>
- ii. Accessibility for Ontarians with Disabilities Act (AODA). <https://www.ontario.ca/laws/statute/90h19>.
- iii. SO 1997, c 16, Sch A | Workplace Safety and Insurance Act, 1997 | CanLII
- iv. Health Protection and Promotion Act. <https://www.ontario.ca/laws/statute/90h07>