ACCESSIBILITY POLICY

PURPOSE

The purpose of this policy is to outline the commitment of Brock University (the “University”) in promoting accessibility, equal participation and inclusion as an inherent right of persons with disabilities by implementing the requirements of the Accessibility for Ontarians with Disabilities Act, S.O. 2005, c. 11 (“AODA”) and its regulations: Integrated Accessibility Standards, O. Reg. 191/11 (“IASR”).

SCOPE

This policy applies to all University employees, faculty, volunteers, students or others who are responsible for delivering goods, services or facilities.

This policy applies to the University’s efforts to remove barriers to participation among persons with disabilities, including attitudinal, communication, physical, policy, programmatic, social, and transportation, towards creating an inclusive environment for all Brock Community members.

POLICY STATEMENT

Brock University recognizes that the Ontario Human Rights Code has primacy over the Accessibility for Ontarians with Disabilities Act and that the Integrated Accessibility Standards Regulations do not diminish the University’s legal obligations toward persons with disabilities that arise under the Human Rights Code.

Brock University is committed to:

i. The removal of systemic, physical, attitudinal, technological barriers that act to prevent or impede the full participation and inclusion of people with disabilities.

ii. Understanding that disability discrimination is based as much on perceptions and stereotypes of anticipated, past or present disabilities as on the existence of actual functional limitations.

iii. Ensuring the University will make efforts to view disability as a flexible concept that is impacted by social
and environmental barriers that prevent full participation.

iv. Understanding the distinct type of disadvantage people with mental health and other non-evident disabilities experience and working to ensure distinct and systemic barriers to equal participation are removed and not replaced.

v. Recognizing that persons with a disability may have additional personal characteristics protected under human rights grounds and that the University will engage in an intersectional approach to the provision of accessibility.

vi. Ensuring reasonable accommodations are provided in a timely manner and uphold the dignity, individualization, integration and full participation of persons with disabilities.

Brock University commits to the ongoing maintenance of measures in adhering to the applicable standards in the AODA Act summarized as follows:

**General Requirements**

I. University ensures that all staff, faculty, volunteers, persons responsible for policy decisions and persons who provide goods and services on behalf of the University receive Human Rights, Customer Service training and specific training for educators on inclusion, universal design in learning, accessible program or course delivery.

II. The University uses accessible design criteria and features that are incorporated into purchasing and acquiring facilities. When proven not practicable to do so, an explanation is provided upon request.

III. The University incorporates accessible features when designing, procuring or acquiring self-serve kiosks.

**Information and Communication Standards**

I. The University ensures that information and communication that can be made accessible upon request through consultation is done so in a timely manner, including emergency plans, course information,
customer service, educational training resources and library materials.

II. The University ensures that it maintains multiple methods of feedback and that methods used are applicable to the Integrated Accessibility Standard Regulation (IASR) including the Accessible Customer Service Standard. Feedback processes are accessible to people with disabilities that require alternate formats or communication supports upon request.

III. The University will ensure that its website and web content conform to the Web Content Accessibility Guidelines (WCAG 2.0) level AA by January 1, 2021.

IV. The University will continue to ensure that staff responsible for creating websites or maintaining and uploading content to Brock Sanctioned websites are trained to be competent of Web Content Accessibility Guidelines Level AA.

V. The University ensures that the public is made aware of any accessibility features that directly affect the public.

Employment

I. The University strives to ensure that its employment strategies are conducive to building a workplace and employment culture that respects diversity and inclusion.

II. The University ensures that all employees and applicants have access to accommodation upon request through the Brock University Employment Accommodation Policy.

III. The University consults with an employee making a request to ensure that they can equally participate by ensuring the provision of accessible workplace information, communication supports emergency response information and documented individual accommodation plans.

Design of Public Spaces

I. The University ensures that the requirements of the Integrated Accessibility Standard Regulation and the Ontario Building Code are implemented in any applicable construction project or development of features or
physical space through the use of the Facility Accessibility Design Standards.

**Customer Service**

Assistive and mobility devices may be used to access any goods or service directly offered by the university.

I. Upon request, the University will communicate with persons with disabilities in ways that take into account their disability.

II. Persons with disabilities accompanied by a guide dog/service animal may access University owned or operated premises that are open to the public or other third parties, and may keep the animal with them except where excluded by law or for health and safety reasons.

III. Where an animal is excluded by law or health and safety reasons other options will be made available that ensure the dignity, integration, individualization and full participation of the individual.

**Use of Support Persons**

I. Persons with disabilities accompanied by a support person may access University owned or operated premises that are open to the public or other third parties.

**Notice of Temporary Disruptions**

I. In the event of a planned or unplanned disruption a document of temporary disruptions will be distributed to the Brock community. Notices will contain a description of alternative facilities or services, anticipated duration, and notice that the document is alternative in formats upon request.

**Definitions**

**Accessibility** is a term used to describe a product, device, service, or environment which is available to as many people as possible. Accessibility is concerned with inclusiveness and barrier-free design (the identification, removal, and prevention of barrier). Accessibility can be viewed as a person’s access to and benefit from a system or entity in a way that upholds the
principles of dignity, independence, integration and equality of opportunity.

**Barrier** means anything that prevents any person with a disability from fully participating in all aspects of society because of their disability, including, but not limited to; physical barriers, architectural barriers, information or communications barriers, attitudinal barriers, technological barriers, or policies and procedures that inadvertently pose barriers.

**Disability** means, 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 mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, 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, a condition of mental impairment or a 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, or an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act 1997.

**COMPLIANCE AND REPORTING**

This policy falls under the jurisdiction of the Vice-President, Administration. The responsibility for applying, interpreting and monitoring compliance with this Policy rests with Human Rights and Equity. Unit supervisors are responsible for identifying and addressing violations of this Policy.

<table>
<thead>
<tr>
<th>Policy owner:</th>
<th>Vice-President, Administration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Authorized by:</td>
<td>Board of Trustees, Human Resources Committee</td>
</tr>
<tr>
<td>Accepted by:</td>
<td>Senior Administrative Council</td>
</tr>
<tr>
<td>Effective date:</td>
<td>December, 2013</td>
</tr>
<tr>
<td>Next review:</td>
<td>March, 2021</td>
</tr>
<tr>
<td>Revision history:</td>
<td>November, 1994; February, 2010; March, 2018</td>
</tr>
<tr>
<td>Related documents:</td>
<td><strong>Legislation:</strong></td>
</tr>
<tr>
<td></td>
<td>Ontario Human Rights Code</td>
</tr>
<tr>
<td></td>
<td>Accessibility for Ontarians with Disabilities Act (AODA)</td>
</tr>
<tr>
<td>Employment Standards Act</td>
<td></td>
</tr>
<tr>
<td>---------------------------</td>
<td></td>
</tr>
<tr>
<td>Occupational Health and Safety Act</td>
<td></td>
</tr>
<tr>
<td>Blind Persons Act</td>
<td></td>
</tr>
</tbody>
</table>

**University Policies:**
- Respectful Work and Learning Environment Policy
- Employment Accommodation Policy
- Academic Integrity Policy
- Academic Accommodations for Students with Disabilities
- Student Code of Conduct
- Student at Risk Policy
- Workplace Violence Prevention Policy
- Occupational Health and Safety Policy
- Employment Equity Policy