

<b>Policy Title:</b>	<b>ACCESSIBILITY POLICY</b>	<b>Area of Responsibility:</b> <b>VICE PRESIDENT, INTERNATIONAL RELATIONS, CAMPUS DEVELOPMENT &amp; STUDENT SERVICES</b>
<b>Policy Section:</b>	<b>ADMINISTRATION</b>	<b>Policy No: 2.2</b>
<b>Effective Date:</b>	<b>2023 03 23</b>	<b>Page: 1 of 5</b>
<b>Supersedes:</b>	<b>2021 03 25</b>	<b>Last Review Date: 2023 03 23</b>
<b>Mandatory Review Date:</b>	<b>2028 03 23</b>	

## 2.2 ACCESSIBILITY POLICY

At St. Clair College, we believe in and promote the rights of all persons with disabilities as enshrined in the *Canadian Charter of Rights and Freedoms*, the *Ontario Human Rights Code*, the *Accessibility for Ontarians with Disabilities Act (2005)* and its related *Accessibility Standards Regulations*. The College is committed to fostering a rich working and learning environment that affirms the rights of all persons, including those with disabilities, to have access to equal opportunity in employment, education, accommodation or business dealings with the College.

This policy applies to all members of the College community, which includes all employees, students, volunteers and others who provide goods, services or facilities on behalf of the College.

### 1.0 Principles

The College further affirms its commitment to promoting the following principles in all of its policies and interactions with persons with disabilities:

- Dignity - treating those with disabilities with dignity who are as valued and deserving of effective and full service as any other customer, client or employee.
- Independence – freedom from control or influence of others; freedom to make your own choices.
- Integration – allowing people with disabilities to fully benefit from the same services, in the same place and in the same or similar ways as others.
- Equal opportunity – having the same access, as others.
- Commitment to Excellence - in serving and providing goods, services or facilities to all customers including people with disabilities.

### 2.0 Objectives

In accordance with the aforementioned principles, the College strives to provide, short of undue hardship:

- a framework for the adoption of and compliance with all regulatory standards legislated by the government of Ontario vis-à-vis accessibility for Ontarians with disabilities;

- equal access to services, facilities and educational programs;
- equal opportunity in employment;
- a work and study environment that is free of discrimination;
- the continual improvement of access to college property, facilities and services;
- the development, publication, and review of its annual Accessibility Plan including participation of persons with disabilities;
- quality services – both what we deliver and how we deliver services – to all members of the College community.

All areas of the College are accountable for ensuring accessibility and all areas of the College are responsible for the appropriate internal and/or external communication to support this policy.

### **3.0 Framework**

Consistent with the Accessibility for Ontarians with Disabilities Act’s purpose of achieving “...accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025.”, St. Clair College strives to provide an accessible learning and work environment for all persons with disabilities who interact with the college.

This policy is a resource to the St. Clair community in its efforts to ensure the College is accessible to persons with disabilities, and in compliance with the regulations set forth by the Government of Ontario. As such, this policy mirrors the regulatory standards developed by, or in development by, the government and its representatives on the standards development committees.

These regulatory standards include:

- 1) Standard for Accessible Customer Service
- 2) Standard for Accessible Information and Communication (in development)
- 3) Standard for Accessible Employment (in development)
- 4) Standard for Accessible Transportation (St. Clair College does not provide direct transportation services to students)
- 5) Standard for Accessible Built Environments (in development)

To fulfill these commitments, St. Clair College will develop appropriate procedures, which will be monitored and reviewed, to ensure access and accommodation for all persons with disabilities.

### **4.0 Definitions**

The definition of disability used in this policy is the same as that used by the Accessibility for Ontarians with Disabilities Act (2005) and the Ontario Human Rights Code. That is, a disability is:

- (a) 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.
- (b) A condition of mental impairment or a developmental disability.

(c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.

(d) A mental disorder.

(e) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

### **5.0 Annual Accessibility Planning**

As per the *Ontarians with Disabilities Act (2005)*, St. Clair College will carry out annual Accessibility planning, with representatives from the disabled population of the St. Clair community. The plan and report will be publicly available.

### **6.0 Accessible Customer Service**

In its provision of goods and services to members of the public with disabilities, the College will do so following the principles of **independence, dignity, integration and equality of opportunity**.

In such cases where a person with a disability requires (usually an approved accommodation through a counsellor and healthcare professionals) the use of their own personal **assistive devices** in order to access the goods and services provided by the College, they are welcome to do so. Assistive devices include, but is not limited to the following examples: hearing aids, wheelchairs, electronic organizers, magnifying devices, electronic voice synthesizers.

Persons with disabilities, who rely on the service of a **guide dog** or other **service animal**, are welcome to bring such animals with them to the College in order to access the goods and services provided. The only exception to this practice is where such animals are prohibited by law. See [Service Animal Policy #7.9](#) for further information and procedures

If the use of a **support person** is required in order to access the goods and services provided by the College, persons with disabilities are welcome to bring such support persons with them to the College. A support person may be a trained professional, friend or family member – whomever the person with a disability deems appropriate. Where admission fees are charged, provide notice ahead of time on what admission, if any, may be charged for a support person of a person with a disability.

Further, in compliance with the **Accessibility Standards for Customer Service**, Ontario Regulation 191/11, the College shall:

- use reasonable efforts to ensure that its policies, practices and procedures are consistent with the core principles of independence, dignity, integration and equality of opportunity.
- provide notice when facilities or services that people with disabilities rely on to access or use the College's goods or services are temporarily disrupted.

- welcome feedback on how the College provides accessible customer service. Customer feedback will help us identify barriers and respond to concerns. Comments, questions and concerns can be submitted via the web at <https://stclaircollege.ca/student-services/accessibility-resources>. All feedback, including complaints, will be directed to the Director of Student Services and brought to the College Accessibility Committee. Customers will receive an acknowledgment within two business days and a response within five business days.
- communicate all these services and procedures to the public in an accessible manner, including their provision in alternative formats. This includes posting this policy, the annual plan and report and associated documentation on the College's website. The St. Clair College policy for accessibility for persons with disabilities can be found at <https://stclaircollege.ca/student-services/accessibility-resources>.
- where needed, provide customized emergency information to help anyone with a disability during an emergency. With the person's consent, the College will provide emergency information to a designated person who is providing assistance to that person during an emergency.

### **6.1 Training**

St. Clair College is committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train:

- a) all persons who participate in developing the organization's policies; and
- b) all other persons who provide goods, services or facilities on behalf of the organization

Training of College employees and volunteers on accessibility relates to their specific roles. Training includes:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- our policies related to the Customer Service Standards
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities.
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

The College will train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

St. Clair College will maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

### **7.0 Standard for Accessible Information and Communication**

St. Clair College has a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

The College will communicate with people with disabilities in ways that take into account their disability. When asked, the College will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) in a timely manner, taking into account the person's accessibility needs due to disability; and
- b) at a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

We notify the public about the availability of accessible formats and communication supports by posting to the web at <https://stclaircollege.ca/student-services/accessibility-resources>

We will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

### **8.0 Standard for Accessible Employment**

St. Clair College is committed to ensuring its employment practices are accessible. The College's recruitment and selection practices will provide equal treatment in employment without discrimination as stated in the Ontario Human Rights Code and will comply with the Accessibility for Ontarians with Disabilities Act (AODA) and any other enabling legislation. To support AODA requirements St. Clair College will:

- notify job applicants, through all job postings, that accommodations are available upon request in relation to the materials or processes to be used. If accommodations are requested, Human Resources will consult with the applicant to best determine how to arrange for suitable accommodations that take into account the applicant's accessibility needs due to their disability.
- ensure when making offers of employment to new employees, through the Letter of Offer, that related policies and practices to accommodate employees with disabilities are communicated.
- notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. The College provides updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.
- consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. The College will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee's job; and
- b) information that is generally available to employees in the workplace
- where needed, provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, the College will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.
- provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.
- review the individualized workplace emergency response information:
  - a) when the employee moves to a different location in the organization;
  - b) when the employee's overall accommodations needs or plans are reviewed; and
  - c) when the employer reviews its general emergency response policies.
- have a written process to develop individual accommodation plans for employees. *See Request for Permanent Accommodation Policy 5.16*
- have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.
- ensure performance management, career development and redeployment processes take into account the accessibility needs of all employees.

**Other policies, available to staff via the intranet, that support AODA requirements include:**

- ❖ St. Clair College has a Return to Work and/or Temporary Modified Work Policy.
- ❖ WSIB Return to Work/Temporary Modified Work Program and Case Management Policy.
- ❖ Request for Accommodation Policy.

**9.0 Standard for Accessible Transportation**

The College does not provide transportation services to its students, however the College is committed to working with providers to ensure transportation services are accessible.

**10.0 Standard for Accessible Built Environments**

The College is committed to ensuring its buildings are accessible and incorporating accessibility standards in the construction of new facilities and when renovating existing space to create barrier free access. This aspect of the policy will be developed more fully once the relevant regulation is developed and proclaimed as law by the government of Ontario.

**11.0 Authority**

All areas of the College are accountable for ensuring that the principles of this policy are upheld. However, it is the responsibility of the Senior Operating Committee, to ensure that this policy is reviewed every three years and as required to ensure adherence to developing law (i.e., regulatory standards for accessibility).