



Policy Title	Accessibility Policy
Issued By	Human Resources & Facilities Management
Contact	Director of Human Resources/Acting Director of Facilities Management
Approved By	President, Brescia University College
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Purpose:

This policy covers Accessibility requirements related to Employment, Customer Service, and Built Environment.

Policy:

Brescia University College is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* and Ontario’s accessibility laws.

Brescia University College is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination and understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

Brescia University College is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities. Brescia is working towards full compliance with the current standards of the *Integrated Accessibility Standards Regulation (IASR) Policy, Regulation 191/11, under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*. In doing so, we affirm our commitment to providing quality services in a manner that respects the dignity and independence of persons with disabilities through the creation of a barrier-free environment for all of our students, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services.

Employment

Brescia University College will make every effort to identify, remove, and prevent barriers by developing inclusive employment procedures that support persons with disabilities with accommodations during the recruitment and selection stages, and throughout the employment life cycle.

Recruitment and Hiring

Brescia University College understands that improving workplace accessibility and ensuring an accessible recruitment and selection process for applicants with disabilities can expand the pool of talented candidates. Wisdom, Justice and Compassion are at the core of our Ursuline values and as such, we acknowledge our responsibility to attain a diverse and equitable employment environment that is inclusive of every person. We promote applications from persons with disabilities and ensure postings of positions are advertised through partners supporting persons with disabilities. We encourage applications from all qualified individuals who can contribute to the climate of inclusivity. We are committed to providing an accessible candidate experience and include information during the recruitment and hiring process to candidates to promote inclusivity and to promote the availability of accommodations.

Brescia University College will notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. Where an accommodation is requested, we consult with the applicant to arrange suitable accommodations, such as providing the application in an alternate or accessible format.

Brescia's interview process will focus on experience and skills following pre-designated selection criteria and pre-designed interview questions and will not discriminate against candidates who have a disability or require an accommodation. Brescia University College is committed to hiring decisions that are unbiased and based on qualifications and work and/or lived experience. Successful candidates will be made aware of policies and supports for accommodations upon completion of the recruitment process.

Candidates and employees may submit requests for accessibility needs or accommodations through the Director of Human Resources.

Training and Development

Brescia University College recognizes that skills development and career planning can enrich the employment experience, increase engagement, and reduce turnover for individuals with disabilities. Brescia will align training and development programs to meet the needs of employees and community members with disabilities and provide training as soon as reasonably practicable. Training programs are designed with flexibility to allow customization for the individual requirements of an employee requiring accommodations, such as providing training materials in accessible or conversion-ready formats that take into account the need of the employee. Brescia will consider employee barriers when implementing performance

management processes, or when offering career development, employment support, or advancement opportunities.

We are 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 Brescia.

Training of our employees and volunteers on accessibility relates to their specific roles.

Training will include a review of the purposes of the *Accessibility for Ontarians with Disabilities Act, 2005* the requirements of the Customer Service standard, and information about the following matters:

- How to interact and communicate with people with various types of disabilities;
- Brescia's policies, practices, and procedures relating to the provision of goods and services to persons with disabilities;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- How to use equipment or devices available at the University that may help with the provision of goods or services to a person with a disability;
- What to do if a person with a disability is having difficulty accessing the University's goods and services.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies. Brescia will keep records of the training provided to employees, including dates on which training is provided and the number of individuals to whom it is provided. Training details are reported through the Joint Health and Safety Committee.

Other courses or training may be required or assigned, including training to support accessibility and to meet the needs of those with disabilities.

Communication

Brescia University College will provide or arrange for accessible formats and communication supports for employees, upon request. Brescia will consult with the employee or community member to determine the specific barrier and the best way to provide support. Such accessible formats and communication supports are conversion-ready and will be provided in a timely manner and at no additional cost to the requestor.

When communicating with or providing information to an employee who requires accommodation or assistance due to a disability, Brescia will ensure that all communication with the individual is completed in a manner that takes into account the individual's disability. Where an assistive device is used, we will reasonably accommodate the use of the device.

Emergency Response Plans

If necessary or if requested, Brescia University College will create individualized workplace emergency response plans for employees with disabilities. The emergency response plan will consider the unique challenges created by the individual's disability and the physical nature of the workplace. Emergency response plans will be created by the manager in consultation with the employee and Human Resources, if required. If an employee with a disability requires assistance from a support person during an emergency, Brescia will designate an employee to act as such.

With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will 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.

Accommodation - Employees

The Director of Human Resources along with the payroll and benefits team members assist with providing accommodations to persons with disabilities in the workplace. They provide support to employees on sick leave, short or long-term disability, Workplace Safety & Insurance claims, and returning to work after illness or injury for both the employee and the supervisor.

Individual accommodations are provided to support the needs of employees with disabilities. Functional Abilities will be reviewed and personalized accommodation plans will be designed to allow employees to contribute and participate in job related functions and activities to the best of their abilities. The process of accommodating individuals will take a consultative approach and is a shared obligation of the Director of Human Resources, the employee, the manager, the payroll and benefits team, and any applicable medical or other professionals required to assist the employee throughout the process.

Return to Work

Brescia University College is committed to a supportive return-to-work program and will develop and implement return-to-work processes for employees who are absent from work due to a disability and require accommodations in order to return to work. The Director of Human Resources along with the manager will work with the employee to develop an individualized return-to-work plan and support the employee in the transition period by addressing any barriers. The return-to-work plan will outline the steps the University will take to facilitate the employee's return to work and use documented individual accommodation plans.

Customer Service

Accommodation - Students

Brescia University College has many services and resources available to ensure all students have access to programs, academic material and supports, regardless of accessibility needs.

Individual accommodations are provided to support the needs of students with disabilities. The process and provision of academic accommodations, accommodated exams, alternative format text, interpretation and note taking, learning strategy instruction, assistive technology is managed through Western Accessible Education and Brescia's Registrar.

Brescia's Clare Hall is a modern, fully accessible residence, with wheelchair accessible rooms available upon request. As accessibility needs can be unique per individual, each student will work with the Director of Student Experience to determine a customized accessibility plan upon request.

Access to Goods and Services

Brescia University College will seek to provide barrier-free access to goods and services for all community members. Where barriers cannot be removed, alternate means for accessing goods or services will be provided to the best of our ability.

Support Persons

If a community member with a disability is accompanied by a support person, Brescia University College will ensure that both persons may enter the premises together and that the community member is not prevented from having access to the support person.

In situations where confidential information might be discussed, consent will be obtained from the community member before any potentially confidential information is mentioned in front of the support person.

For a Brescia sponsored event held on campus, if a fee is charged to an attendee for participating in the event, the attendee will be notified of any fee charges for support persons.

Service Animals

A community member with a disability accompanied by a service animal will be allowed access to premises that are open to the public, unless otherwise excluded by law, or where a service animal may need to be excluded from a space for other reasons noted further in this section.

A service animal for a person with a disability may be readily identifiable by "visual indicators" worn by the animal that indicate that the animal is being used by a person for reasons relating to that person's disability. An example of such a service animal might be a guide dog with a vest or harness, which is trained to work with a blind person, and which has the qualifications outlined in provincial laws.

In other cases, it is not readily obvious how the animal is providing support to a person with a disability. In such cases, under Ontario provincial law set out in the AODA, an animal will qualify as a service animal if a person “provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to their disability”:

- A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
- A member of the College of Chiropractors of Ontario.
- A member of the College of Nurses of Ontario.
- A member of the College of Occupational Therapists of Ontario.
- A member of the College of Optometrists of Ontario.
- A member of the College of Physicians and Surgeons of Ontario.
- A member of the College of Physiotherapists of Ontario.
- A member of the College of Psychologists of Ontario.
- A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

The health professional providing the documentation must be licensed in the province of Ontario.

There may be circumstances where a service animal may need to be excluded from a space due to:

- Health and safety requirements, including accommodation needs of others
- Health and safety requirements set out by law;
- An unreasonable or direct threat to the health or safety of others posed by the service animal’s presence, behaviour, or actions;
- Location-specific safety concerns that arise when considering the presence of a service animal.

Regulations under Ontario’s *Health Protection & Promotion Act* state that service animals are permitted in rooms where food is served sold or offered for sale. Service animals are restricted, however, from rooms where food is prepared, packaged, or handled, which includes Brescia’s Mercato.

If a service animal is excluded from a campus space, other arrangements will be explored in order to provide reasonable accommodations for the person with a disability, up to the point of undue hardship, to enable the person with a disability to obtain, use or benefit from the University’s services and facilities.

Brescia faculty and staff with service animals or with concerns relating to service animals are encouraged to work with their manager and Human Resources. Students are encouraged to work with Western’s accessibility services and Brescia’s Registrar or Director of Student Experience (for student concerns) to ensure that all options and needs are carefully considered.

Self-Service Kiosks

Brescia University College will incorporate accessibility features/accessibility for people with disabilities when designing, procuring, or acquiring self-service kiosks.

Communication

Brescia University College understands the importance of accessible digital and non-digital forms of communication and will do its best to provide accessible types of communication and information to all individuals with disabilities. Such accessible formats and communication supports will be provided upon request, in a timely manner and at no additional cost.

Website Accessibility

Brescia University will work to ensure that website accessibility relating to the navigation, design, and coding considerations that help visitors using different types of web-enabled devices and visitors with disabilities who use the website conform to current requirements under AODA.

Service Disruptions

Service disruptions may occur for reasons that may or may not be within the control or knowledge of Brescia University College. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use goods or services, reasonable efforts will be made to provide advance notice.

A notice regarding a temporary disruption will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed in relevant conspicuous locations on our premises and, when appropriate, shall be placed on the [Brescia's accessibility website](#).

Brescia will make every reasonable effort to indicate when services will resume and suggest alternatives that can be utilized during the disruption. In some circumstances, such as in the situation of unplanned temporary disruptions or emergencies, advance notice may not be possible.

Emergency Notifications

Brescia University College will provide emergency and public safety information at evacuation points, and any other emergency alert information, in accessible formats or with appropriate communication supports, upon request.

Brescia's leaders (Directors, Managers, and Supervisors) will:

- Work with any individuals requesting information and to see how to best meet their needs;
- Ensure emergency information can be seen, read, and heard by anyone, including people with disabilities; and

- If a person with a disability requires assistance from a support person in case of an emergency, make sure an employee is available to act as such.

When a fire alarm sounds, it is mandatory that all University buildings be evacuated. Your primary contact for fire safety related questions is the Director of Facilities Management.

Customer Feedback

Customer feedback can lead to improved service, increased clientele, and a reduction in complaints. Brescia University College will ensure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request and will provide customers with disabilities the option to provide feedback through a variety of mechanisms, such as in person, by phone, e-mail, text message, or social media. Feedback forms, along with alternate methods of providing feedback verbally (in person or by telephone) or written (handwritten, delivered, website, or e-mail), are available upon request.

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Building Accessibility

Brescia University College will work to ensure that the built environment, including building interior and exterior, are designed to facilitate barrier-free access to goods or services for customers and employees. If areas of the built environment are not accessible for individuals with disabilities, the University will work with the individual to provide an alternate means of access or comparable alternative arrangements are identified in order to assist in accommodation.

The Built Environment aspect of the *Accessibility for Ontarians with Disabilities Act* will be achieved through two mechanisms: the Design of Public Spaces Standard (within the Integrated Accessibility Standards Regulations) and through amending the Ontario Building Code. The Design of Public Spaces Standard applies to public spaces, like outdoor eating areas and accessible parking, whereas the amendments to the Building Code cover the elements of buildings. In both cases, the changes apply only to new or extensively renovated buildings, with some exceptions.

Brescia University College will ensure extensive renovations to existing buildings or in the design of new buildings will meet or exceed current accessibility guidelines within the constraints of the existing structural conditions, especially within older buildings.

Definitions:

Accessible formats: Include but are not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Assistive device: A technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities.

Communication supports: Captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

Conversion-ready: An electronic or digital format that facilitates conversion into an acceptable format.

Disability: The temporary, prolonged, or permanent reduction or absence of the ability to perform certain commonplace activities or roles sometimes referred to as activities of daily living.

Service animal: An animal that can be recognized by visual indicators such as a vest or harness that is being used by an individual with a disability for reasons relating to the person's disability.

Support person: Another person who accompanies an individual with a disability in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

Audience/Scope:

This policy is intended for all community members, including students, employees, job applicants, suppliers, and any visitors, who enter the premises, learn at Brescia, work for Brescia, access information provided by Brescia, or utilize services at Brescia.

Relevant Legislation/References:

O. Reg. 191/11: Integrated Accessibility Standards under *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11*

Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 to Level AA

Service Animals: Blind Persons' Rights Act, R.S.O. 1990, c. B.7

Related Policies and Procedures:

If any policy has a number of procedures and/or documents associated with it, they should be listed in this section of the policy statement.