



University Students' Council Of Western University

Accessibility Policy

Authority: Chief Operating Officer	Date Ratified: December 6, 2024
	Next Review Date: December 2027
Previous Amendments:	
Related Document(s): USC AODA Multi Year Plan	
Review Committee(s): Human Resources Committee, Board of Directors	
Delegates: Senior Manager, People and Development	

PREAMBLE:

The USC 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.

1. SCOPE

1.1. This policy applies to all paid USC employees ("staff") identified in this policy including those compensated through honoraria (Full-time Staff, Part-time Staff, Coordinators, Associate Vice-Presidents, Interns,, Executive Officers, and Members of the Gazette).

2. DEFINITIONS

2.1. **Disability:** The term "disability" covers a range of visible and invisible conditions that may have been present from birth, caused by an accident, or developed over time. For instance, disabilities include:

- 2.1.1. Blindness or visual impairment
- 2.1.2. Deafness or hearing disabilities
- 2.1.3. Speech impairment

- 2.1.4. Physical or mobility disabilities, such as paralysis, amputation, difficulty with balance or coordination
- 2.1.5. Brain injury
- 2.1.6. Epilepsy
- 2.1.7. Intellectual or learning disabilities
- 2.1.8. Mental health challenges
- 2.1.9. Reliance on a service dog, such as a guide dog, or on a mobility device, such as a wheelchair, walker, or cane.

3. ADMINISTRATION

- 3.1. The Senior Manager, People and Development is responsible for administering the provisions of this Policy. In the event the Senior Manager, People and Development is conflicted, the Chief Operating Officer shall be responsible for administering the Policy.
- 3.2. All issues pertaining to matters of Accessibility as defined in this policy should be brought forward to the Senior Manager, People and Development.
- 3.3. The responsibility for application, enforcement, training, and communication of this policy shall lie with the Senior Manager, People and Development.

4. GENERAL STATEMENT

- 4.1. We are committed to meeting our current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.
- 4.2. We understand 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.
- 4.3. We are committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities.
- 4.4. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

5. EXPECTATIONS AND RESPONSIBILITIES

5.1. Training

- 5.1.1. We are committed to training all staff in accessible customer service, other Ontario accessibility standards, and aspects of the Ontario Human Rights Code that relate to persons with disabilities.
- 5.1.2. Training will be provided to all staff at least once annually and whenever there are updates to the accessibility policies or procedures.

5.1.3. Training of our staff on accessibility relates to their specific roles. Training includes:

1. Purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
2. Our policies related to the Customer Service Standards
3. How to interact and communicate with people with various types of disabilities
4. How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
5. 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.
6. What to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

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

5.1.5. We 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.

5.2. **Assistive Devices**

5.2.1. People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

5.2.2. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

5.2.3. We ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services or facilities.

5.2.4. If applicable, identify how your organization will train staff on the use of assistive devices

5.3. **Communication**

5.3.1. We communicate with people with disabilities in ways that take into account their disability. This may include in-person or over-the-phone communication

5.3.2. We will work with the person with disabilities to determine what method of communication works for them.

5.4. Service Animals

5.4.1. We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties.

5.4.2. When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter, or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

5.4.3. A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

5.4.4. A regulated health professional is defined as a member of one of the following colleges:

1. College of Audiologists and Speech-Language Pathologists of Ontario
2. College of Chiropractors of Ontario
3. College of Nurses of Ontario
4. College of Occupational Therapists of Ontario
5. College of Optometrists of Ontario
6. College of Physicians and Surgeons of Ontario
7. College of Physiotherapists of Ontario
8. College of Psychologists of Ontario
9. College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

5.4.5. If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

1. Explain why the animal is excluded
2. Discuss with the customer another way of providing goods, services or facilities

5.5. Support Persons

5.5.1. A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

5.5.2. Fee/fare will not be charged for support persons.

5.5.3. We notify customers of this by posting a notice on our website.

5.5.4. In certain cases, the USC might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

1. The person with a disability
2. Others on the premises

5.5.5. Before making a decision, the USC will:

1. Consult with the person with a disability to understand their needs
2. Consider health or safety reasons based on available evidence
3. Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

5.5.6. If the USC determines that a support person is required, we will waive the admission fee or fare (if applicable) for the support person.

5.6. **Notice of Temporary Disruption**

5.6.1. In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, the USC will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

5.6.2. The notice will be made publicly available on our website.

5.7. **Feedback Process**

5.7.1. The USC welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

5.7.2. Feedback may be provided in the following ways:

1. On our website
2. In person or over the phone
3. Emailing info@westernusc.ca

5.7.3. All feedback, including complaints, will be initially reviewed by staff in the Feedback position, who will then direct the feedback to the relevant Senior Manager.

5.7.4. Customers can expect to hear back in five business days.

5.7.5. The USC ensures that our feedback process is accessible to people with disabilities by providing accessible formats or communication supports, upon request.

Accessible formats and supports will be provided in a timely manner and at no additional cost, in accordance with the AODA's Customer Service Standard.

5.8. Notice of Availability of Documents

5.8.1. The USC notifies the public that documents related to accessible customer service are available upon request by posting a notice on our website.

5.8.2. The USC will provide these documents in an accessible format or with communication support, upon request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and at no additional cost.

5.9. Self-service Kiosks

5.9.1. We will incorporate accessibility features/consider accessibility for people with disabilities when designing, procuring or acquiring self-service kiosks.

5.10. Information and Communications

5.10.1. The USC is committed to providing information and communication in accessible formats for people with disabilities. This includes information about the organization and its services, including public safety information. We will ensure that information is provided in a timely manner, at no additional cost, and in formats that meet the individual needs of persons with disabilities. If information cannot be converted to an accessible format, we will provide an explanation as to why and a summary of the information.

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

1. In a timely manner, taking into account the person's accessibility needs due to disability; and
2. At a cost that is no more than the regular cost charged to other persons.

5.10.3. 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:

1. An explanation as to why the information or communications are unconvertible; and
2. A summary of the unconvertible information or communications.

5.10.4. We notify the public about the availability of accessible formats and communication supports on our website.

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

5.11. **Employment**

5.11.1. We 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. We consult with the applicants and provide or arrange for suitable accommodation.

5.11.2. We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

5.11.3. We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide 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.

5.11.4. We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

1. Information that is needed in order to perform the employee's job; and
2. Information that is generally available to employees in the workplace

5.11.5. Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. 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.

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

5.11.7. We will review the individualized workplace emergency response information:

1. When the employee moves to a different location in the organization;

2. When the employee's overall accommodations needs or plans are reviewed; and
3. When the employer reviews its general emergency response policies.

5.11.8. We have a written process to develop individual accommodation plans for employees.

5.11.9. We 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.

5.11.10. Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.

5.12. Design of Public Spaces

5.12.1. We will meet accessibility laws when building or making major changes to public spaces. Our public spaces include:

1. Outdoor public event and congregation areas (i.e. Concrete Beach)
2. Service-related elements like service counters, fixed queueing lines and waiting areas

5.12.2. We put procedures in place to prevent service disruptions to the accessible parts of our public spaces.

5.12.3. The University Students' Council will ensure that any new public spaces, including service counters, that it constructs or redevelops, meet the built requirements as required in the Integrated Accessibility Standards Regulation (ON 191/11).

1. We will ensure that these legal provisions are met on sites the USC occupies and sites or properties that it manages, owns, and operates to ensure that contractors performing such construction or redevelopment adhere to these requirements. This includes but is not limited to:
 - a. Section 80.41(1,2) requiring Service Counters to have clear knee space to accommodate mobility aids from the public facing side, with minimum dimensions of 750 mm wide x 680 mm high x 250 mm deep below the service counter, with an additional toe space beyond of 750 mm wide x 230 mm high x 230 mm deep

6. COMMUNICATION

6.1. This policy will be explained as needed to workers through orientation or task-specific training, and will be included in new hire paperwork.

6.2. All Members will be trained on this policy annually.

7. EVALUATION

7.1. This policy shall be reviewed annually and as needed through the Continuous Improvement Policy for Human Resources Policies.