

TITLE: Accessibility Policy

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Approved By:
 Board of Governors
 President's Council
 Senate

1. PURPOSE

This policy outlines how The Sheridan College Institute of Technology and Advanced Learning (“Sheridan”) will comply with the requirements of the *Integrated Accessibility Standards*, O. Reg. 191/11 (“IAS”) issued under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”).

2. SCOPE

This policy applies to the provision of goods, services or facilities to persons with disabilities that are members of the Sheridan community or third parties to which Sheridan provides goods, services or facilities. Examples of such individuals includes, but is not limited to, current or prospective students, alumni, visitors, and representatives from other organizations (e.g. government or private sector), contractors, researchers, event attendees, guest lecturers, etc.

As required by the IAS, sections of this policy apply to Sheridan’s employment practices, to certain elements of Sheridan’s property and facilities, and where Sheridan provides certain transportation services.

All Sheridan employees, agents, volunteers, students or others who are responsible for delivering goods, services or facilities by, or on behalf of Sheridan to members of the Sheridan Community, are required to comply with this policy. All departments or areas of Sheridan have a shared responsibility to implement this policy operationally or through policies, practices or procedures.

All Sheridan policies and procedures related to the provision of Sheridan goods, services or facilities must also comply with the Customer Service Standard and the IAS.

The AODA and the IAS do not diminish Sheridan's legal obligations toward persons with disabilities that arise under the Human Rights Code¹ or any other Act or which are otherwise imposed by law. If two laws conflict, the provision that provides the highest level of accessibility for persons with disabilities is the law that will be followed (AODA, Section 38).

3. DEFINITIONS

Accessible Formats: May include but not limited to large print, recorded audio and electronic formats, Braille, and other formats usable by persons with disabilities.

Communications: The interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

Communication Supports: May include but not limited to 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 accessible format.

Disability: (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, or(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*.

Educators: Employees who are involved in program or course design, delivery and instruction.

Guide Dog: A "guide dog" is a dog trained as a guide for a blind person, and which has the qualifications prescribed under the *Blind Persons' Rights Act*

Kiosk: An interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

¹ The Human Rights Code prohibits discrimination on the basis of disability (and other protected grounds) in respect of goods, services or facilities, accommodations, contracts, employment and vocational organizations.

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

- (a) the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
- (b) the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
 - (i) A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
 - (ii) A member of the College of Chiropractors of Ontario.
 - (iii) A member of the College of Nurses of Ontario.
 - (iv) A member of the College of Occupational Therapists of Ontario.
 - (v) A member of the College of Optometrists of Ontario.
 - (vi) A member of the College of Physicians and Surgeons of Ontario.
 - (vii) A member of the College of Physiotherapists of Ontario.
 - (viii) A member of the College of Psychologists of Ontario.
 - (ix) A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support Person: In relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs, or with access to goods, services or facilities.

Other definitions commonly accepted in practice:

Assistive Devices: Devices and technologies that increase mobility, hearing, vision and communication capacities of persons with disabilities.

4. POLICY STATEMENT

To deliver a premier, purposeful educational experience in an environment renowned for creativity and innovation, Sheridan shall at all times undertake reasonable efforts to provide goods, services or facilities in a way that respects the dignity and independence of persons with disabilities. Sheridan is also committed to providing persons with disabilities the same opportunity to access Sheridan goods, services or facilities and allowing them to benefit from these same services, in the same place and in a similar way as that given to other persons.

Sheridan is committed to the reasonable provision of Sheridan goods, services or facilities to all persons, including persons with disabilities. Sheridan will carry out its responsibilities to meet the accessibility needs of persons with disabilities in a timely manner in the following areas:

4. 1 Use of Assistive Devices

Persons with disabilities may use Assistive Devices to access Sheridan goods; services or facilities and Sheridan will facilitate use of such Assistive Devices, as needed.

4.2 Communication

Communication occurs in a variety of ways – in person, by phone, in writing and online. Sheridan communicates with persons with disabilities in ways that take into account their disability, using a consultative approach.

4.3 Use of Guide Dogs or Service Animals

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

Where law excludes the guide dog or service animal, other options are to be made available to ensure the owner has access to Sheridan goods, services or facilities.. Where the guide dog or service animal may affect the health and safety of other persons, Sheridan shall discuss the situation with both parties and make every effort to meet the needs of both parties.

4.4 Use of Support Persons

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

Where the assistance of a support person is required by a person with a disability they must not be prevented from having access to the support person.

Before Sheridan requires a person with a disability to be accompanied by a support person for health and safety reasons, Sheridan will consult with the person with a disability to understand their needs, consider health or safety reasons based upon available evidence and determine whether there is no other reasonable way to protect the health and safety of the person with a disability and the health or safety of others on the Sheridan premises.

Where a Sheridan department or area charges an entry fee, the department or area will ensure that notice is given in advance about the amount, if any, payable in respect of the support person. Sheridan will not charge an entry fee to a support person in any case where Sheridan requires the presence of the support person in accordance with the previous paragraph.

4.5 Notice of Temporary Disruptions

Notice of temporary disruptions of Sheridan facilities or services usually used by persons with disabilities is provided as far in advance, or as soon as possible, as is reasonable in the circumstances, and will include:

- The reason for the disruption;

- The anticipated duration of the disruption; and
- Information identifying alternative facilities or services, if any that may be available.

4.6 Training

4.6.1 Training

Sheridan ensures that appropriate training is provided to (1) all employees and volunteers, (2) to those persons who develop and approve Sheridan policies, practices and procedures, and (3) any other person who provides goods services or facilities on behalf of Sheridan.

Appropriate training includes a review of the purposes of the AODA, and the requirements of the IAS and the *Human Rights Code* as it pertains to persons with disabilities, and includes specific training on the Customer Service Standards of the IAS, and including the following:

- How to interact and communicate with persons with various types of disability;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog, service animal or support person to access Sheridan goods, services or facilities;
- How to use equipment and/or assistive devices available on Sheridan premises or otherwise provided by Sheridan that may help with the provision of goods, services or facilities to people with disabilities;
- What to do if a person with a disability is having difficulty accessing Sheridan goods, services or facilities; and
- Sheridan's policies, practices and procedures relating to the Customer Service Standards of the IAS.

Training is provided in a way that best suits their actual duties.

4.6.2 Training to educators

Sheridan shall provide Educators with relevant accessibility awareness training related to accessible program or course delivery and instruction.

4.6.3 Records of Training

Sheridan keeps records of the training provided under Section 4.6.1 and 4.6.2 including the dates on which the training is provided and the number of individuals to whom it is provided, in accordance with Sheridan's Record and Information Management Policy and Retention Schedules.

4.7 Accessibility plan

Sheridan establishes, implements, maintains and documents a multi-year accessibility plan (“the plan”), which outlines Sheridan’s strategy to prevent and remove barriers and meet its requirements under the IAS.

The plan is on the Sheridan website. Sheridan will undertake a review and update the plan in consultation with the Sheridan Accessibility Advisory Committee every two years.

An annual status report on the progress of measures taken to implement the plan is posted on the Sheridan website.

The plan and annual status report are available in an accessible format upon request.

4.8 Procuring or acquiring goods, services or facilities

Sheridan incorporates accessibility design, criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so.

Where Sheridan determines it is not practicable to incorporate accessibility design, criteria and features, Sheridan will provide an explanation upon request.

4.9 Self-service kiosks

Sheridan incorporates accessibility features when designing, procuring or acquiring self-service kiosks.

4.10 Feedback Process

Sheridan maintains a feedback process so that members of the public are able to comment on the provision of goods, services or facilities to persons with disabilities by visiting Sheridan’s Accessibility web site at: www.sheridancollege.ca/about/accessibility.aspx.

The feedback process allows for comments in person, by telephone, in writing or by electronic text, or otherwise and will specify the actions that will be taken by Sheridan if a complaint is received.

Sheridan will ensure that all other feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request.

4.11 Accessible formats and communication supports

Sheridan will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account a person's accessibility needs due to disability, and at a cost that is no more than the regular cost charged to other persons. Sheridan will consult with the person making the request in determining the suitability of an accessible format or communication support and assess the reasonableness of the request.

4.12 Emergency procedure, plans or public safety information

Sheridan will provide any emergency procedures, plans or public safety information that it makes available to the public, in an accessible format or with appropriate communication supports, upon request.

4.13 Accessible websites and web content

Sheridan will work toward making its websites and web content conform to the Worldwide Web Consortium's Web Content Accessibility Guidelines (WCAG), initially at WCAG 2.0 Level A and increasing to WCAG 2.0 Level AA by January 1, 2021.

4.14 Educational and training resources and materials, etc.

On notification of need Sheridan will provide:

- Educational or training resources or materials in an accessible format that takes into account the person's accessibility needs due to disability by procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of the educational or training resources or materials, where available, or, where that is not possible, arranging for the provision of a comparable resource in an accessible or conversion ready electronic format; and
- Student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities.

4.15 Producers of Educational or training material – Textbooks and Printed Materials and Educational or training supplementary learning resources

Sheridan will, upon request, make accessible or conversion ready versions of textbooks or supplementary print-based learning material produced by Sheridan.

4.16 Libraries of educational and training institutions – Print based resources or materials and Digital or Multimedia resources or materials

Where available and upon request, the Sheridan library shall provide, procure or acquire by other means an accessible or conversion ready format of print-based resources or materials for a person with a disability.

Beginning January 1, 2020, this standard will apply to digital and multimedia resources or materials as well.

This requirement does not apply to special collections, archival materials, rare books and donations.

4.17 Employment Standards

4.17.1 Employee Recruitment

Sheridan:

- Notifies its employees and the public about the availability of accommodation for applicants with disabilities in the recruitment process;
- Notifies job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used; and
- Consults with the applicant to provide or arrange for the provision of a suitable accommodation that takes into account the applicant's accessibility needs due to disability.

4.17.2 Notice to successful applicants

When making offers of employment, Sheridan notifies the successful applicant of Sheridan's policies for accommodating employees with disabilities.

4.17.3 Informing employees of supports

Sheridan informs employees of its policies used to support its employees with disabilities including those on the provision of job (workplace) accommodations that take into account an employee's accessibility needs due to disability.

This information is provided to new employees as soon as practicable after they begin their employment with Sheridan.

Updated information will be provided to employees whenever there is a change to existing policies on the provision of job (workplace) accommodations.

4.17.4 Accessible formats and communication supports for employees

When requested by an employee with a disability, Sheridan consults with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed to perform the employee's job and information generally available to employees in the workplace.

4.17.5 Workplace emergency response information

Sheridan provides individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and Sheridan is aware of the need for accommodation due to the employee's disability.

The information required is provided as soon as practicable after Sheridan becomes aware of the need for accommodation.

Individualized workplace emergency response information is reviewed when:

- An employee moves to a different location;
- An employee's overall accommodation needs or plans are reviewed; and
- When Sheridan reviews its general emergency response policies.

4.17.6 Documented individual accommodation plans

The Sheridan "*Workplace Accommodation*" policy and procedure outlines a written process for the development of documented individual accommodation plans for employees with disabilities. The process includes the elements outlined in section 28(2) of the IAS.

4.17.7 Return to work process

The Sheridan "*Return to Work*" policy and procedure outline a return to work process for employees who have been absent from work due to disability and require disability-related accommodations to return to work.

4.17.8 Performance management, career development and advancement, and redeployment

Sheridan takes into account the accessibility needs of employees with disabilities and individual accommodation plans in performance management processes, when providing career development and advancement opportunities and when considering redeployment of employees with disabilities.

4.18 Transportation

Where Sheridan provides transportation services it shall provide accessible vehicles or equivalent services upon request.

4.19 Design of Public Spaces Standards (Accessibility Standards for the Built Environment)

Sheridan applies the requirements of the Design of Public Spaces Standards to public spaces that are newly constructed or redeveloped (i.e. where planned significant alterations are undertaken) on or after January 1, 2016 and that are covered by Part IV.1 of the IAS.

4.20 Availability and Format of Documents

If Sheridan is asked to provide this document or any other document describing this policy to a person with a disability, Sheridan will do so in a timely manner in a format that accommodates the person's disability.

4.21 Responsibility and Authority

1. The Responsible Office shall be the Centre for Equity and Inclusion Human Resources, it shall have the authority to draft procedures, interpret the policy and consult with the relevant departments or Responsible areas who have responsibility for drafting the applicable procedures in their particular department or areas.

5.0 Related Documentation (Procedures/Additional Policies/Forms)

[Accessibility for Ontarians with Disabilities Act, 2005](#)

[Ontario Regulation 191/11 Integrated Accessibility Standards](#)

[Human Rights Code](#)

[Blind Persons' Rights Act](#)

[Records and Information Management Policy](#)

[Workplace Accommodation Policy](#)

[Return to Work Policy](#)