

1.0 Preamble

SKG is committed to providing a working and learning environment that is accessible and inclusive to all persons who work or study at SKG, and all persons who interact with it. In creating such a community, SKG aims to foster a climate of understanding and mutual respect for the dignity and worth of all persons.

To achieve this goal, SKG shall establish policies, practices and procedures that are consistent with both the letter and the spirit of the accessibility standards established under the Accessibility for Ontarians with Disabilities Act (AODA), to identify, remove and prevent barriers to people with disabilities in our learning and working environments.

2.0 Purpose

The purpose of this policy is to ensure that SKG provides a learning and working environment that is inclusive of all persons and supports all members of the community in an equitable manner. This policy is intended to provide clear guidance on how SKG will achieve the applicable obligations and responsibilities under the Accessibility for Ontarians with Disabilities Act (AODA) and O. Reg. 191/11: Integrated Accessibility Standards.

This policy sets out SKG's commitments and standards to provide an accessible working and learning environment and meet the provisions of the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act and its regulations concerning program design and service delivery to persons with disabilities.

This policy addresses SKG's compliance with legislated standards, including but not limited to standards concerning:

- Provision of goods and services to persons with disabilities,
- Provision of documents and information in accessible formats,
- Provision of educational resources or materials,
- Use of assistive technologies,
- Use of service animals,
- Use of support persons,
- Training,
- Transportation,
- Feedback regarding the provision of goods and services to persons with disabilities, and
- Notice of availability and format of documents, and

- Notice of temporary disruptions in services and facilities.

3.0 Definitions

“AODA” means the Accessibility for Ontarians with Disabilities Act.

“Conversion-ready” means an electronic or digital format that facilitates conversion into an accessible format.

“Customer” is the term used in the AODA to describe patrons, stakeholders, or anyone in receipt of goods and services. The primary recipients of SKG’s services are its current students and employees. Other individuals, such as alumni, prospective students and their family members, and members of the broader community, may be entitled to certain services.

“Disability” means a disability as defined in SKG’s policies HR 03 Accommodations in Employment or ACAD 09 Accommodations for Students with Disabilities, as applicable.

“Director of Human Resources” means the senior executive in SKG responsible for human resources policies and oversight of human resources operations (regardless of the title of that position).

“Employee” means a person who performs work for wages in any capacity for SKG, whether a full-time or part-time employee, and whether or not the employee has supervisory duties. Independent contractors and volunteers are excluded from this definition.

“SKG” means Shingwauk Kinoomaage Gamig.

“Student” means an individual registered in a course or program of study at SKG, whether full-time or part-time.

4.0 Principles

SKG shall ensure that its policies, procedures, and practices support inclusiveness and full participation, and are consistent with following the core principles:

- Dignity – Goods and services are provided in a manner that is respectful to persons with disabilities and does not diminish the person’s importance.
- Independence – Respecting the right of persons with disabilities to do for themselves and to choose the way they wish to receive goods and services.
- Integration – - Integration means providing service in a way that allows the person with a disability to benefit from the same services, in the same place and in the same or similar way as others.
- Equal Opportunity – Service is provided to persons with disabilities in a way that their opportunity to access goods and services is equal to that given to others.

5.0 Policy

SKG shall meet all applicable requirements of the Ontario Human Rights Code (OHRC), the Accessibility for Ontarians with Disabilities Act (AODA) and Ontario Regulation 191/11 (and/or other applicable legal requirements that may be enacted in future).

SKG shall meet applicable standards in regulations under the AODA concerning information and communication, employment, the built environment, and customer service.

The following subsections set out specific requirements.

5.1 Provision of goods and services to persons with disabilities

SKG shall provide goods and services to persons with disabilities in a way consistent with the principles set out in this policy.

When communicating with a person with a disability, SKG will do so in a manner that takes into account the person's individual needs.

5.2 Provision of documents and information in accessible formats

SKG shall create, procure through purchase, or obtain conversion-ready documents, where available. SKG shall provide a document that SKG has developed and made available to the public in an accessible format if a person with a disability requests access to the document.

- Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.
- SKG may determine that a document cannot be converted into an accessible format that can be used by the requester, because conversion is not technically feasible or because SKG does not have technology that enables the conversion. Where this is the case, SKG shall attempt to procure or obtain by other means the document in an accessible or conversion-ready electronic format. If SKG determines that a document cannot be procured or converted, SKG shall provide a comparable resource or, if required, a summary of the information in the document in a format accessible to the requester.

SKG shall provide communications supports for public communications that SKG carries out if a person with a disability requests access to communications supports.

- Communication supports may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

SKG shall consult with the person with a disability making a request for a document in an accessible format or for a communications support to determine an appropriate accessible format or communications support.

If costs are normally applied for documents or information that is subject to a request, SKG shall provide accessible formats and communications supports to a requester at a cost no more than the regular cost applied to other persons.

5.3 Provision of educational resources or materials

Where SKG provides educational resources or materials, SKG shall take into account the accessibility needs of the person with a disability to whom the material is to be provided and shall ensure that these resources or materials are provided in an accessible format in a timely manner.

SKG shall provide information on its program requirements, availability, and descriptions in an accessible format to persons with disabilities.

SKG shall provide student records in an accessible format to students with disabilities.

SKG shall provide or acquire an accessible or conversion-ready format of print, digital or multimedia resources or materials held in its library to any person eligible with a disability who is eligible to use SKG's library, upon request.

5.4 Use of assistive technologies

Personal assistive technologies are permitted and unrestricted in all areas of SKG to which students, employees and the public have access, except when subject to operator safety and/or the requirements of academic integrity.

- Where issues are raised concerning academic integrity and assistive technologies, these issues shall be addressed through SKG's policy Accommodations for Students with Disabilities.

Personal assistive technologies include devices and other technologies.

- Assistive devices are equipment that persons with disabilities utilize to assist in their daily lives at home, work, school, and so forth. Such devices could be a walker, scooter, cane, magnification or specialized learning software, communication board, and so forth.
- Assistive technology is equipment or software such as screen readers, audio recording and voice recognition that people with disabilities use to obtain information and communicate with others.

The use and safety of personal assistive technologies is the responsibility of the person with a disability.

5.5 Use of service animals

Persons with a disability who are accompanied by a service animal may access premises owned or operated by SKG, if the public has access to such premises and the animal is not otherwise excluded by law. If a service animal is excluded by law, SKG will ensure that alternate means are available within reasonable time and location to provide persons with a disability access to its goods and services.

For this policy, a "service animal" is defined as in the AODA regulation and means:

- An animal that 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

- An animal concerning which the person provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to the disability; or
- An animal concerning which the person provides a valid identification card signed by the Attorney General of Canada for persons who are blind or use a guide dog.

There may be rare circumstances where, for reasons of health and safety of another person, allowing a person with a disability to enter a premise accompanied by a service animal needs to be considered. If deemed necessary, a risk assessment will be conducted by the Director of Human Resources. This assessment will identify:

- The risks inherent with the service animal being in the area of concern; and
- Alternate measures available to enable the person with a disability to access this service.

The use and safety of the service animal is the responsibility of the person with a disability.

5.6 Use of support persons

SKG welcomes staff, students and visitors who are accompanied by a support person, when the support person has been hired or chosen by the person with a disability to accompany them in order to assist in accessing goods or services and/or for the purposes of providing support with mobility, personal assistance and/or communication. Persons with a disability who require a support person may access premises owned and/or operated by SKG with their support person.

Support persons are permitted to accompany students and employees with disabilities to their work and learning environments. Individuals who are accompanied by a support person are encouraged to inform relevant persons of their participation (for example, instructors, facilitators, supervisors, event organizers).

There may be rare circumstances where, for reasons of health and safety of another person, allowing a person with a disability to enter a premises accompanied by their support person needs to be considered. If deemed necessary, a risk assessment will be conducted by the Director of Human Resources. This assessment will identify:

- The risks inherent with the support person being in the area of concern; and
- Alternate measures available to enable the person with a disability to access this service.

Support persons shall be permitted entry to all SKG facilities, meeting rooms and events that are open to the public, except when there are fees applied against participants by a third party. Where there are admission fees for an event organized by SKG, persons with a disability shall be expected to pay the same fee as other attendees, but no admission fee shall be charged to their support person.

If issues are raised concerning academic integrity and the use of a support person, these issues shall be addressed through SKG's policy Accommodations for Students with Disabilities.

5.7 Training

SKG shall provide training on AODA customer service standards to all current employees.

New employees shall be provided such training as part of their orientation.

Volunteers whose activities include interaction with students and/or members of the public shall also receive training.

Such training shall include, but may not be limited to:

- A review of the purposes of the AODA and the requirements of the Accessibility Standards for Customer Service;
- Rights and responsibilities on the duty to accommodate people with disabilities under the *Ontario Human Rights Code*, the Postsecondary Education Accessibility Standards and the Canadian Charter of Rights and Freedoms, all other accessibility standards as they apply to postsecondary institutions
- Overview of ableism, microaggressions, implicit bias, discrimination, and allyship;
- How to interact and communicate with persons with various types of 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 the available equipment or devices that may assist with the provision of services to persons with disabilities;
- What to do if a person with a disability is having difficulty in accessing SKG's services; and
- Where applicable to the duties of the employee, how to develop and review policies, procedures and practices relating to the provision of services to persons with disabilities.

SKG shall provide additional accessibility awareness training to its faculty and instructors related to:

- Accessible program or course design and delivery,
- Accessible instruction, and
- Creation of conversion-ready materials including a course syllabus and other instructional materials.

SKG shall provide additional accessibility awareness training to employees who are involved in the development and approval of customer service policies, procedures, and practices, and to other employees with relevant responsibilities related to:

- Procurement,
- Creation of conversion ready materials,

- Accessible event planning, and
- Emergency evacuation and safety planning considering the needs of persons with disabilities

5.8 Transportation

SKG shall, upon request, arrange for accessible transportation services, if and when transportation services are provided by SKG.

SKG shall notify the public and employees that accessible transportation will be arranged for persons with disabilities when a request is made.

5.9 Feedback about the provision of goods and services to persons with disabilities

SKG welcomes feedback (comments, suggestions, and complaints) about the delivery of services to persons with disabilities, as it may identify areas that require change and assist in continuous service improvement.

Feedback shall be welcomed concerning all goods and services provided by SKG, access to its facilities, accessible formats and communication, and its website.

- SKG shall include information concerning its feedback process to the public through its website, in a manner that is readily available.
- SKG shall provide information about its feedback process in accessible format on request.
- Feedback may be by telephone, in person, in writing, by delivering an electronic message, or otherwise.
- SKG shall make best efforts to provide a response in the same format in which the feedback was received.

Where possible, feedback shall be addressed immediately. Some feedback, however, may require more effort to address and may need to be reviewed before an action is taken.

SKG's response to feedback received shall include a description of the actions that SKG will take, as applicable, in response to the feedback.

The Director of Human Resources shall respond to feedback within 21 working days.

5.10 Notice of availability and format of documents

SKG's accessibility policy, notices of temporary disruptions, and information about processes for written feedback shall be posted on SKG's website.

SKG's accessibility policy, notices of temporary disruptions, and processes for written feedback shall be available in accessible format upon request.

When providing these documents to a person with a disability, SKG will endeavor to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

- SKG shall consult with an individual making a request for a document in an accessible format to determine the format in which the document will be provided.

5.11 Notice of temporary disruptions in services and facilities

SKG recognizes that persons with disabilities often make additional arrangements in order to access services (for example, they may book accessible transit, or arrange for transportation, arrange a location to meet a support person). SKG shall provide notice of service disruptions when any facility, technology, or service that a person with a disability usually uses to access SKG's goods and services is temporarily unavailable or is expected to be temporarily unavailable in the near future.

In the event of a service disruption on campus affecting students, employees, visitors, contractors, or members of the general public, the Director of Human Resources shall take reasonable steps to report such disruption in a timely fashion through appropriate information channels.

Such channels include, but are not limited to, SKG's website, physical postings (temporary signage) on or immediately adjacent to the affected area, and/or communication via email to affected individuals, departments, or groups. In accordance with the AODA, notice must be conspicuous and indicate any alternatives that exist to allow access to persons with disabilities during the disruption.

The information necessary for any communication of a temporary disruption may include:

- The time, date, and location of the disruption;
- Information about the reason for the disruption;
- Anticipated duration of the disruption;
- Description of alternate route posted immediately adjacent to the affected area;
- Descriptions of alternative facilities or services, if any; and
- Contact information for the responsible service area.

6.0 Related Policies, Procedures & Documents

ACAD 09 Accommodations for Students with Disabilities and its associated procedure

HR 03 Accommodations in Employment and its associated procedure

SKG's policies and procedures may be found [here](#).

7.0 Responsible Officer

Director of Human Resources

8.0 Version history

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SKG gratefully acknowledges that parts of this policy are patterned on that of OCAD University and the Ontario Human Rights Commission's *A policy primer: Guide to developing human rights policies and procedures*.