Preamble

In June 2005, the Ontario government passed a new law called the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*. The AODA provides for the development, implementation, and enforcement of accessibility standards with a vision of a fully accessible Ontario by 2025.

The requirements in the standards are not a replacement or a substitution for the requirements established under the *Human Rights Code* nor do the standards limit any obligations owed to persons with disabilities under any other legislation.

The AODA is “standards-driven” (not complaints driven) and covers the public/private/not-for-profit sectors. Queen’s is considered a large designated public sector organization. THE AODA has numerous and specific accessibility requirements in five areas:

1. Customer Service
2. Information and Communications
3. Employment
4. Transportation
5. Built Environment

**Accessibility Standards for Customer Service Regulation**

Ontario’s first accessibility standards for customer service came into force January 1, 2008. The standards outlines what organizations must do to provide their goods and services in ways that are accessible to persons with disabilities. The public sector deadline for compliance was January 1, 2010. Private and Not-For-Profit sector deadline for compliance is January 1, 2012.

**Integrated Accessibility Standards Regulation**

This Regulation covers three accessibility standards: Information & Communications, Employment, and Transportation. It became law on June 3, 2011 and the requirements begin to come into effect July 1, 2011.

The information and communications standards sets out how organizations will be required to create, provide, and receive information and communications that are accessible for persons with disabilities. The employment standards set out specific requirements for the recruitment, retention, and

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1 The transportation standards are the only set of standards that are sector specific, that is, they relate specifically to modes of transportation that come under the jurisdiction of provincial and municipal governments. However, when Queen’s provides transportation services, it is required to provide accessible vehicles or equivalent services upon request.
accommodation of paid employees with disabilities. The transportation standards are the only set of standards that are sector specific, that is, they relate specifically to modes of transportation that come under the jurisdiction of provincial and municipal governments.

**Accessible Built Environment**

The final proposed build environment standard was submitted to the government for consideration in July of 2010. The government continues to work on this fifth and final standard. This standard is intended to reduce barriers in buildings and outdoor spaces such as; entrances, doorways and corridors, parking spaces, and recreation areas.

**Rationale for a Renewed Framework**

Over the years, Queen’s has worked to address issues regarding accessibility in customer service, information & communications, employment, the built environment, and where appropriate, transportation. The culmination of these efforts is the development of this Comprehensive Strategic Framework for Accessibility, which requires the endorsement of our constituent groups - persons with disabilities – and the approval of our university’s senior management group.

It is imperative that Queen’s has a comprehensive and functional framework for addressing the provincial government’s accessibility standards under the AODA; the customer service standards, transportation, employment, information & communications, and when it comes into force, the built environment standards.

A strong framework will reflect the commitment Queen’s has to the interests and needs of persons with disabilities and will ensure the efficient support to units and departments across our campus in complying with the legislation.

**Compliance**

Important aspects of AODA compliance include planning what needs to be accomplished to identify, remove, and prevent barriers to accessibility as well as reporting on the policies and procedures in place to address access issues. The five priority areas that we have identified—Customer Service, Information & Communications, Employment, Built Environment, and Education, Training & Awareness – are in various stages of accessibility compliance. The Comprehensive Strategic Framework for Accessibility is intended to be a tool for addressing all aspects of AODA compliance on campus.

**Comprehensive Strategic Framework for Accessibility**

**Purpose of the Strategic Framework**

A Comprehensive Strategic Framework for Accessibility will allow the Accessibility Coordination Team to develop an Accessibility Plan that will serve the university in the following ways:
1. To develop plans to address accessibility in five priority areas
2. To establish shared accountability and responsibility for accessibility for persons with disabilities at Queen's University, including funding accessibility-related expenses through standard operating budgets and identifying other sources of revenue streams
3. To provide educational opportunities about accessibility to improve understanding of accessibility issues and the university obligations in accessibility compliance
4. To continue efforts to incorporate accessibility issues in university diversity initiatives

The Accessibility Plan must include:

- The Plan shall report on the measures the university has taken to identify, remove, and prevent barriers to persons with disabilities
- The Plan shall describe the measures in place to ensure that the university assesses its policies, practices, programs, and services to determine their effect on accessibility for persons with disabilities
- The Plan shall list the policies, programs, practices, and services that the university will review in the coming year to identify barriers to persons with disabilities
- The Plan shall describe the measures the university intends to take in the coming years to identify, remove, and prevent barriers to persons with disabilities
- The university shall make the Plan available to the public

Five priority areas have been identified in which to assess compliance and through which to accomplish the outcomes stated above.

1. Customer Service
2. Information & Communications
3. Employment
4. Built Environment
5. Education, Training, & Awareness
Consulting Persons with Disabilities and Communication of the Accessibility Plan

As previously mentioned, Queen’s has a duty to consult persons with disabilities in preparing our Accessibility Plan, hence the member-at-large position on each of the five Working Groups.

Other disability stakeholder groups outside the Queen’s community should also be given the opportunity to participate, such groups include:

- Parent of students who have disabilities
- Alumni
- Visitors to campus and/or our websites (including contractors)
- Individuals who receive services from the university, and/or their family members
- Representatives from disability organizations

Methods for wider public consultation and feedback include:

- Community forums
- Focus groups
- Invitations to community members to attend specific meetings of the Working Groups
- Website presence specific to accessibility initiatives at Queen’s
Accessibility @ Queen’s Portal

The development of a comprehensive and consolidated website that acts as a portal to other relevant websites and resources will serve to elevate accessibility at Queen’s and lead to improved accessibility for everyone on our campus.

A consistent method of internal and external communications ensures that our staff, students, faculty, and visitors with and without disabilities are informed of all our new or revised policies, practices, and procedures and how they can support and provide feedback concerning accessibility initiatives.

This Portal can act as a mechanism for demonstrating compliance with the Regulations and standards.

It would be an excellent tool in aiding the university to meet its obligations to consult with persons with disabilities.

Priority Working Groups

The five Groups will comprise of members with direct responsibility of their area as it pertains to the identified priorities. Critical to the success of these Groups is the involvement and commitment of staff and student administration and faculty. Participation of members of the Queen’s community living with disabilities will be especially encouraged as the university has an obligation to consult persons with disabilities. Each Group will invite persons with disabilities with a particular interest in the Group’s area of priority to consider becoming a member-at-large.

Members will develop and implement plans to assess current accessibility compliance in their respective areas and propose action items to address short and long-term accessibility areas of focus.

As these five priority areas are in various stages of accessibility compliance, and given that the built environment standards are yet to come into force, it is expected that both the workload and
composition of membership will alter accordingly. There will be times that the Groups should meet monthly, and times when this is not necessary.

**Accessibility Coordination Team**
This Team will consist of the Director of Human Rights and Equity and the Director of Environmental Health and Safety as Co-Chairs, and the Priority Working Group Leads (Customer Service, Information & Communications, Employment, Built Environment, and Education, Training & Awareness). This Team will be responsible for the development of specific elements of the Accessibility Plan. The Equity Advisor will serve as Secretary to the Team.

It is anticipated that this Team will meet as often as necessary to provide a harmonized effort toward the development of a comprehensive and integrated Accessibility Plan.

**Executive Accessibility Steering Committee**
This Committee will comprise of a small team of key university senior management that is charged with the oversight of accessibility compliance in every aspect of university life. The Rector will be on this Committee to represent student interests.

Recommended composition of the committee:

- Provost & VP(Academic)
- VP (Finance & Administration)
- Rector
- Director Human Rights and Equity Offices
- Director Environmental Health and Safety
- Equity Advisor (Secretary)

It is anticipated that this Committee will meet 3 times an academic year and present the Accessibility Plan to the Vice-Principals’ Operations Committee for approval.

**Vice-Principals’ Operations Committee**
Senior leadership commitment is the most important requirement in building the Accessibility Plan to achieve compliance. Senior leaders set the pace, tone, and culture of the organization. To sustain an organization that embraces the principles of dignity, independence, integration, and equality of opportunity, the commitment to these principles must start at the top. Reinforcement of these principles is the responsibility of all levels of management. In addition, there is no reason to believe that the new Regulations will not continue to require that senior administrators sign-off on the Plans. Therefore, the Vice-Principals’ Operations Committee will approve the Queen’s Accessibility Plan.

**Accessibility Coordination**
To ensure consistency and continuity in the preparation and implementation of the Accessibility Plan, responsibility for its coordination and development rests with the Equity Advisor, Equity Office.
Conclusion

Being a centre of academic excellence requires the fullest participation of the best and the brightest, unimpeded by arbitrary barriers. The challenge is to ensure that, in addition to our exceptional academic programs, we are able to provide the kinds of support which will allow our students, staff, and faculty to obtain the greatest educational and employment opportunities possible.

The proposed Comprehensive Strategic Framework for Accessibility is an appropriate institutional response that will balance institutional responsibilities with accessibility priorities within fiscal realities.