Public Communication of the Accessibility Plans and Annual Reports

Queen’s current and past Accessibility Plans and Annual Reports are available:

- Online at the Equity Services website at Reports and Plans
- By telephoning Equity Services at (613)533-2563
- By sending an email request to equity@queensu.ca
- By mailing a written request to:
  Human Rights and Equity Office
  Queen's University
  Mackintosh-Corry Hall, Room B511
  99 University Avenue
  Kingston, ON, K7L 3N6
- In alternate formats as requested.

Accessibility Feedback

Queen's recognizes that feedback is critical to the process of identifying and removing barriers to participation as well as improving how we deliver our services to persons with disabilities. The Accessibility Feedback Online Form can be used to submit feedback about accessibility to Accessibility Services.

Feedback may also be given by emailing Equity Services at equity@queensu.ca, by telephone at (613) 533-2563, or by fax at (613) 533-2031. You may also send feedback via mail to:
  Human Rights and Equity Office
  Queen's University
  Mackintosh-Corry Hall, Room B511
  99 University Avenue
  Kingston, ON, K7L 3N6.
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Section One: Introduction

Background
Under the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”), Queen’s University is considered a large designated public sector organization. As such, Queen’s is required to establish, implement, maintain, and document a multi-year accessibility plan. That document constitutes Queen’s University’s Accessibility Plan (“the Plan”) for the period 2016 – 2025.

AODA legislation also requires public sector organizations to prepare an Annual Report (“the Report”) relative to the multi-year accessibility plan. This Report documents the planning and implementation activities undertaken by Queen’s as part of the multi-year Plan, for the period May 1, 2018 to April 30, 2019.

Vision & Commitment
Queen’s vision is to improve opportunities for persons with disabilities and to provide for their involvement in the strategic identification, removal, and prevention of barriers to their full participation. Accessibility planning provides the university with the opportunity to take a comprehensive look at its services, policies, procedures, practices, and programs to determine which aspects of its operations require action towards advancing accessibility. In order to support progress and meaningful implementation of the Plan, a strong foundation built upon the following principles is necessary.

Informed & Committed Leadership
- All Departments and Units are asked to provide input into the Plan.
- Accountability is demonstrated through the Plan and its related accessibility documentation, made publicly available and in alternative formats upon request.
- Mandatory accessibility and human rights training is offered for all staff, faculty, and students acting on behalf of the university.
- Engaged and aware employees incorporate accessibility into daily practices at all levels of the organization and are encouraged to use an inclusionary lens when preparing policy and procedural documents or developing programs and services.

Queen’s University’s Comprehensive Strategic Framework for Accessibility

Phase Two - Competency
1. Consult with persons with disabilities whose input is shared with the five working groups and throughout the cycle.
2. The names and processes of each working group and committee are as follows:
   a. Information and Communication Working Group: continue to monitor Queen’s websites and departmental compliance efforts (with WCAG 2.0 Level A) and make recommendations through an annual environmental scan report.
b. **Built Environment Advisory Group**: continue its work to meet obligations of the Design of Public Space requirements coming into force in 2016.

c. **Community of Practice** *(formerly the Education, Training, and Awareness Working Group, which has been put on hiatus)*: include input from the Centre for Teaching and Learning, IT Services, and the Equity Office.

d. **The Policy Advisory Subcommittee (PSAC)** *(formerly the Policy Advisory Working Group, which has folded)*: has agreed to expand its Terms of Reference to include providing feedback on Accessibility policies, procedures, and guidelines.

e. **Employment Working Group**: has been put on hiatus. The AODA requirements have been met operationally by the Human Resources department through the development of the *Accommodation of Disabilities in the Workplace Policy*, *Individualized Accommodation Procedures*, *Disability Accommodation Guidelines*, *Return to Work Policy*, and *Return to Work Procedure*.

---

**Section Two: Status Update – (2018/2019) – Meeting AODA Requirements**

The following is a summary of actions taken to achieve compliance with 2018/2019 applicable requirements under the AODA and the Integrated Accessibility Standards Regulation (IASR 191/11). Compliance deadlines appear in brackets and refer to January 1st of the given year.

**Customer Service Standards**

In 2017, Queen’s released new guidance for the use of Service Animals: *Guidelines for Customer Service to Persons Who Use Service Animals* and *Procedures for Persons Who Use Service Animals* through the work of an *ad hoc* committee representing Student Wellness, Exams Office, Residences, Environmental Health & Safety, Human Resources, Human Rights & Equity, Secretariat’s Office, and QUFA.

Since the use of Service Animals by students has increased, the work of the ad hoc committee has continued in order to update policies and guidance and increase awareness.

**Information and Communication Standards**

Communicating and providing information in ways that are accessible to all is another cornerstone of building an accessible organization.

The Information and Communications Working Group completed an environmental scan of Queen’s University, focusing on the Information and Communication Standards within the Integrated Accessibility Standards.

*191/11, section 14 – Websites conform to Web Content Accessibility Guidelines – WCAG 2.0 Level A (2014)*

Although the compliance date has passed, work on compliance continued in 2018/19.

✓ ITS has again purchased a one-year subscription to Site Improve.
The Information and Communications Working Group completed an environmental scan of Queen’s compliance with the Information & Communications Standards.

The Information and Communications Working Group welcomed new members in 2019 in order to develop an Action Plan regarding Queen’s websites and compliance efforts (with WCAG 2.0/2.1 Level A/AA).

Design of Public Spaces and the Built Environment
For new and significant construction or renovation projects, Queen’s University will ensure:

- Newly constructed and redeveloped outdoor public-use eating areas shall adhere to accessibility requirements.
- Newly constructed and redeveloped exterior paths of travel shall adhere to accessibility requirements.
- Newly constructed and redeveloped off-street parking facilities and on-street parking spaces shall adhere to accessibility requirements.
- New service counters (inclusive of replacing existing service counters) shall adhere to accessibility requirements.
- Fixed queuing guides shall adhere to accessibility requirements.
- Newly constructed or redeveloped waiting areas where the seating is fixed to the floor shall adhere to accessibility requirements.
- Procedures are included for preventative and emergency maintenance of accessible elements in public spaces and for dealing with temporary disruptions when required accessible elements are not in working order.

Accessibility Framework
The Built Environment Advisory Group developed new Terms of Reference to reflect upon the group’s purpose and how best to serve the Queen’s community. New membership was added, providing more diverse, knowledgeable, and experienced viewpoints. Fifty per-cent of the current group are persons with disabilities.

5-year accessibility plan for barrier removal
Facilities – Physical Plant Services has developed a 5-year accessibility plan for barrier removal in existing buildings. In 2018, the University approved Facilities funding in the amount of $250,000 with the intent to increase funding each year by $25,000 over the 5-year period. With the assistance of the BEAG, a strategy for barrier remediation for existing buildings was developed which included:

- Existing buildings that are not undergoing major renovations are grandfathered under the Ontario Building Code and are not required to be updated.
- Enhancing accessibility and creating inclusive environments on campus is a priority.
- With substantial accessibility components that would benefit from improvements, selecting key barriers for remediation requires a targeted approach.
In 2018, over 25 automatic door operators and exterior directional signage were added to many buildings. For 2019, $275,000 was approved for Facilities to address issues such as access to ‘Blue Lights’ (security) and additional automatic door openers.

**Mitchell Hall**

Mitchell Hall is the university’s new innovation and wellness centre at the heart of campus where every aspect of campus life intersects. It is a place where students from all programs come to access wellness services and learn about entrepreneurship supports on campus, and it supports leading-edge engineering education and research.

The Côté Sharp Student Wellness Centre, funded through philanthropy, is co-located to provide Queen’s students with comprehensive health-related services in a modern, centralized, and accessible space, and provides the opportunity to plan and implement new technologies and enhance services.

The co-location of innovation and wellness services, a recommendation of the Principal’s Commission on Mental Health, blends academic, recreational and other student life activities, and emphasizes to our students the important relationships that connect mental health, physical well-being, and academic success.

**Other Accessibility Projects**

- New single-user (gender neutral) accessible washrooms in:
  - Duncan McArthur Hall
  - Mac-Corry Hall
  - McLaughlin Hall
- New platform lift in Mac-Corry Hall
- New elevators and/or improvements in Dupuis Hall and Botterell Hall
- New exterior ramp improvements

**Education, Training, & Awareness**

Queen’s recognizes the importance of collaboration in order to share and gain expertise. We continue to strengthen our capacity to inform, educate, raise awareness, and involve persons with and without disabilities on and off campus. AODA training, face-to-face and online, continues to be undertaken in 2018/19.

**191/11, section 7 & Section 16 – Training**

- Online training continues to be provided on the requirements of the accessibility standards under Ontario Regulations 191/11 and on the Ontario Human Rights Code.
- The [Queen’s AODA Training Suite](#) can be found on the Equity Office website.
- Face-to-face training was made available upon request.
- The Equity Office tracked training completion and kept records for compliance purposes.
Quarterly Compliance Progress Reports were sent to all departments and units.

All employees and volunteers are encouraged and provided opportunities to access all available AODA training. However, for the purposes of tracking compliance of our employees, the Equity Office adheres to the Federal Contractors Program criteria: Employees are defined as those earning a salary and who are employed by the university for more than 12 weeks and/or work more than 14 hours per week. This excludes Adjunct 1s, Affiliates, Associates, Co-op Students, Guests, and Casual employees.

The tables below are a comparison of percentages of completion by active employees between May 2018 and May 2019.

Although the completion rates for Human Rights 101, Access Forward, and Accessibility Instruction for Educators training all increased, the table shows that more work is necessary for compliance.

<table>
<thead>
<tr>
<th>May 2019</th>
<th>Customer Service Training</th>
<th>Human Rights 101</th>
<th>Access Forward</th>
<th>Accessibility Instruction for Educators</th>
</tr>
</thead>
<tbody>
<tr>
<td>Active Faculty and Staff (4679)</td>
<td>84.1%</td>
<td>70.1%</td>
<td>72.3%</td>
<td>50.1% (1843, total Educators)</td>
</tr>
<tr>
<td>Students and Casuals (3696)</td>
<td>57.9%</td>
<td>49.3%</td>
<td>49.2%</td>
<td>N/A</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>May 2018</th>
<th>Customer Service Training</th>
<th>Human Rights 101</th>
<th>Access Forward</th>
<th>Accessibility Instruction for Educators</th>
</tr>
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<tbody>
<tr>
<td>Active Faculty and Staff (4679)</td>
<td>84.4%</td>
<td>67.3%</td>
<td>69.0%</td>
<td>48.1%</td>
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<tr>
<td>Students and Casuals (3696)</td>
<td>59.8%</td>
<td>48.7%</td>
<td>48.8%</td>
<td>N/A</td>
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</tbody>
</table>


Queen’s strives to improve its ability to consult, engage, listen, and reframe accessibility issues so that the results work better to meet the expectations and needs of persons with disabilities. We
continually seek new ways to engage with persons with disabilities about how Queen’s might best ensure everyone’s full participation. Below are some accessibility achievements that exceed AODA requirements.

**Accessibility Cafés**

Accessibility Cafés are a chance for the Queen’s community to get together to discuss building an inclusive and accessible Queen’s community that follows the requirements of the AODA. Each Café has a unique topic, and all participants are encouraged to share their perspectives and generate ideas around the question: “How can we improve upon what Queen’s is doing already towards imagining and then building an even stronger inclusive and accessible Queen’s community?”

- A Café was held on October 31, 2018. The event provided:
  - An overview of the 5 year deferred maintenance/accessibility plan for barrier removal
  - An overview and opportunity to join the Built Environment Advisory Group (BEAG).

The Café was well attended by students, staff, faculty, community members and alumni.

**Accessibility Hub**

- Since its launch, the Accessibility Hub has assisted over 120 Queen’s Departments and Community Services with accessibility issues.
- Through the Accessibility Hub website, the Accessibility Coordinator has responded to:
  - Over 950 specific requests since the website launched (October 2013).
  - Requests range from the simple to very complex, and include: built environment, video captioning, workplace accommodations, audio transcripts, website and document accessibility, physical access, accessible transportation, and accessible parking.
- Since Google Analytics was added to the Hub (November 22, 2013) there have over 157,000 visitors to the website, viewing over 280,000 pages.

**DEAP Tool**

The Diversity and Equity Self-Assessment & Planning (DEAP) Tool for Academic and Administrative Units has been developed by the Queen’s University Equity Office to help Units better understand their working environment climate as it relates to equity and diversity. Implementation of the DEAP Tool across units will be an additional method to help ensure the university not only meets, but also in some cases exceeds, the AODA requirements. The DEAP Tool is a self-audit tool for internal use to allow Units to:

- Understand the demographic profile of their staff, faculty, and students
- Assess how inclusive the Unit is
- Provide an opportunity to reflect on areas in need of improvement using the Diversity Score Card assessment template
- Support further commitments to equity and diversity
- Develop an action plan and timeline to enhance inclusion.
The Tool also is designed to complement other administrative responsibilities of units such as:

- Departmental Strategic Planning
- Cyclical Review Process (CPR) and Queen's University Quality Assurance Process (QUQAP's)
- Hiring and Appointments Processes
- Implementation of the Academic Plan.

Eight academic units and two Administrative units have selected a goal under the Inclusion Indicator Accessibility in the DEAP Tool.

**Education, Training, & Awareness**
Queen's recognizes the importance of collaboration in order to share and gain expertise. We continue to strengthen our capacity to inform, educate, raise awareness, and involve persons with and without disabilities on and off campus.

- The ‘From Diversity to Inclusion in the Workplace’ Certificate Program, co-developed between Human Resources and the Human Rights and Equity Office, continues to achieve good enrollment rates.
- The Accessibility Coordinator presented at TD Day on creating accessible course content.
- The Accessibility Coordinator staffed information booths at SOAR and the Graduate Students Resource Fair.
- The Accessibility Coordinator presented at the new Faculty Orientation.
- The Accessibility Coordinator delivered accessibility training to Orientation leaders, Residence staff, AMS, ASUS, and the Engineering Society.
- The Accessibility Coordinator participates on the Campus Master Plan Advisory Committee (CMPAC), Advisory Committee on Academic Accommodations, Transition Resource Guide Advisory Board - Regional Assessment and Resource Centre (RARC), and the Municipal Accessibility Advisory Committee (MAAC), City of Kingston.
- Throughout the year, the Accessibility Coordinator has provided training and workshops to many Departments and Units regarding website, document, and social media accessibility, including Alumni Relations, Orientation leaders, Homecoming volunteers, ASUS, Facilities, Office of the Associate Vice-Principal (International), and Department of Finance.

**Student Wellness Services**

**Student Wellness Services** (SWS) is the university’s central health-care and related service provider comprising four streams of service: Health Promotion, Student Health Services, Counselling Services, and Queen's Student Accessibility Services (QSAS).

Queen’s Student Accessibility Services (QSAS) continues to provide services to students with disabilities to ensure equitable access to the academic environment, and works closely with faculty members to ensure an individualized response to challenges. In addition to accommodation planning,
the QSAS team provides learning strategy support, transition support, education and awareness sessions, and advocacy. QSAS also continues to work with the Centre for Teaching and Learning and Faculties/Schools to integrate Universal Design for Learning principles into academic accommodation planning.

Additional activities in 2018-19 included:

✓ Research and planning for the implementation of new software that better supports workflow and the process of accommodations.
✓ The addition of a full-time term position.
✓ Staff served on the university’s Service Animal committee to develop a process for students registering a service animal.
✓ The Occupational Therapist staff complement in Student Wellness Services increased to provide enhanced supports to students with injuries, illnesses and disabilities.
✓ Planning for Student Wellness Services’ move to Mitchell Hall. The main level, fully accessible, central and modern space will support the needs of students with disabilities on campus. In addition, Mitchell Hall houses a new university Examination Centre that coordinates the scheduling and sitting of all centrally administered accommodated final exams, and all midterm exams requiring computer-based accommodations. The centre has been designed to accommodate a broad range of required environments.

**Final Exam Accommodations**

QSAS arranges final exam accommodations through the Exams Office. The number of accommodated exams provided by the Exams Office has sharply increased over the years.

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<tbody>
<tr>
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<td>3558</td>
<td>4654</td>
<td>4756</td>
<td>5443</td>
<td>5381</td>
</tr>
</tbody>
</table>

**Mental Health**

Student Affairs offers a number of programs designed to help students, faculty, and staff support those experiencing mental health issues. These programs aim to:

✓ Help provide timely, professional, compassionate care to students in distress.
✓ Raise awareness about the personal and developmental impact of mental-health problems.
✓ Help reduce the stigma associated with mental illness.
✓ Provide information and support to members of our community who are supporting individuals experiencing mental-health challenges.
✓ Encourage people to talk and help create more openness about mental health.
Mental Health Training
✓ Identifying and Responding to Students in Distress (IRSD)
✓ Mental Health: Awareness, Anti-Stigma, Response
✓ Mental Health First Aid (MHFA) Canada.

Steve Cutway Accessibility Award
✓ Established in 2008, this award recognizes students, staff, and faculty who demonstrate innovation, enthusiasm, and compassion in creating learning and work environments that allow the full participation of persons with disabilities.
✓ The Equity Office coordinates the nominating group as well as the event.

In 2018, Llynwen Osborne was awarded the Steve Cutway Accessibility Award for showing her commitment to accessibility by initiating a program within Physical Plant Services to educate colleagues and employees on Deaf culture. This new level of interaction creates a more positive, inclusive, and enriched working experience, especially for the deaf community within PPS. Providing this opportunity not only improves the quality of life of staff, but also creates a potential for greater equality of opportunity at the university.

Section Four: Moving Forward to 2025

AODA Requirements
The following chart indicates future AODA requirements that Queen’s University will have to meet. As with all the preceding AODA requirements, failure to meet these requirements could lead to a non-compliance designation and result in financial implications for the University.

Information and Communications

<table>
<thead>
<tr>
<th>Timeline</th>
<th>Requirement</th>
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<tbody>
<tr>
<td>January 1, 2020</td>
<td>1. Make available, upon request, accessible or conversion ready versions of printed material that are educational or training supplementary learning resources.</td>
</tr>
<tr>
<td></td>
<td>2. Where available, our Libraries will be required to provide an accessible or conversion ready format of digital and multimedia resources or materials, upon request (some exceptions).</td>
</tr>
<tr>
<td>January 1, 2021</td>
<td>3. Ensure all internet website and web content will conform to established WWW Consortium Web Content Accessibility Guidelines 2.0 Level AA (some exceptions).</td>
</tr>
</tbody>
</table>

Future AODA Standards

The Onley Recommendations

Regular reviews of the AODA are required to make sure the legislation is working as intended and to identify where improvements can be made. David Onley was mandated to lead the scheduled
independent review of the AODA. The report was tabled with recommendations to the Ontario government in January 2019.

Some recommendations from the Onley AODA Independent Review Report and how they might affect Queen’s:

*Foster cultural change to instill accessibility into the everyday thinking of Ontarians. Build accessibility into the curriculum at every level of the educational system, from elementary school through college and university. Include accessibility in professional training for architects and other design fields.*

If adopted, this would have an impact on faculties’ curricula by requiring them to incorporate accessibility through UDL and specific training, especially in engineering, urban planning etc.

*Direct the standards development committees for K-12 and Post-Secondary Education and for Health Care to resume work as soon as possible.*

New Standards may require that UDL pedagogy be used, and that Learning Management Systems (LMS) and website extranets be within the scope of the website accessibility requirements. This may also have an impact on medical equipment and procurement.

*Revamp the Information and Communications standards to keep up with rapidly changing technology.*

We expect improved Standards to have an impact on all websites, web content, apps, LMS, intranets, and extranets, and require that these technologies be Level A/AA to current level of WCAG (currently 2.1).

*Ensure that accessibility standards respond to the needs of people with environmental sensitivities.*

This may require new policies to be developed, and would affect the work of Environmental Health & Safety, HR, PPS, Student Wellness, and Human Rights & Equity.

*Develop new comprehensive Built Environment accessibility standards through a process to review and revise the 2013 Building Code amendments for new construction and major renovations, review and revise the Design of Public Spaces standards, create new standards for retrofitting buildings.*

This recommendation would require more rigorous implementation of the processes of procurement of material and services, design, and construction for new build projects and renovations. This would affect PPS, engineers, architects, contractors, and sub-contractor involved in such projects.
Enforce the AODA

This would establish a complaint mechanism for students and employees to report AODA violations, possibly exposing Queen’s to increased scrutiny and risk with respect to compliance.

Education Standard

The provincial government has decided to develop two Education Standards: one for K-12 and a second for post-secondary. The SDC will develop recommendations for a proposed accessibility standard to address barriers in publicly funded post-secondary education provided by colleges and universities, as required by Section 9 of the AODA.

Health Care Standard

As part of Ontario’s Accessibility Action Plan, the Government of Ontario has committed to identifying and addressing accessibility barriers in the health-care sector through the creation of a Health Care Standard. An SDC will develop a new accessible Health Care Standard as required by Section 9 of the AODA.

Canadians with Disabilities Act

In June 2018, the Federal Government introduced Bill C-81 ‘An Act to ensure a barrier-free Canada’. The purpose of this Bill is to ensure that Canada becomes fully accessible to persons with disabilities, effectively implementing the equality rights which the Canadian Charter of Rights and Freedoms and the Canadian Human Rights Act guarantee.

At the time of writing this report the Bill has been passed into law.

Accessibility is Key for Success in Equity, Diversity, & Inclusion

Over the years, and especially of late, a great deal of work has gone into diversity and inclusion efforts. The university has made clear its intention to put these efforts into action to ensure tangible and lasting positive change. As the authors of the Principal’s Implementation Committee on Racism, Diversity, and Inclusion Report rightly point out, goals for equity, diversity, and inclusion fit within a larger framework of institutional cultural norms at Queen’s, which are foundational to the mission of the university. However, with so much moving the diversity and inclusion needle, we need to be mindful to continue to include persons with disabilities in this critical work. An intersectional perspective is needed to understand fully the interaction of different social identities within a context of connected systems and structures of power. The accessibility principles of dignity, independence, integration, and equality of opportunity are key to successful equity, diversity, and inclusion efforts.

Section Five: Conclusion

Queen’s University has made great strides toward greater accessibility for our students, staff, faculty, and visitors. With the Integrated Accessibility Standards Regulation acting as a primary driving force, the Accessibility Framework has focused its efforts on achieving legislative compliance through the
development and implementation of best practices approaches to accessibility in the post-secondary environment. As awareness of how accessibility contributes to student, staff, and faculty engagement expands, so too will the barrier-identification processes and responses that bring continuous improvement in accessibility for persons with disabilities. We are a community that works together to create an environment where everyone has a full and enriching Queen’s experience.