



Policies, Procedures and Guidelines

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Accessibility Policy

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Section A: Introduction

Purpose and Scope

Purpose

1. The purpose of this Policy and related guidelines is to:
 - a) articulate McMaster University's (the "University") commitment to **accessibility**;
 - b) provide guiding principles, rules, and approaches to ensure compliance for the implementation of both the [Integrated Accessibility Standards Regulation \("IASR"\)](#) under the [Accessibility for Ontarians with Disabilities Act \("AODA"\)](#), as well as key accessibility goals, as outlined in the University's [Equity, Diversity and Inclusion Strategic Framework and Action Plan \(2019\)](#);
 - c) describe the framework the University is following to comply with its obligations under the AODA;
 - d) describe the shared responsibility of McMaster's **Employees**, students, and Members of the University Community ("**Community Members**") to ensure an accessible and disability-inclusive University; and
 - e) facilitate the identification, removal, and prevention of **barriers** to persons with disabilities when accessing the University's workplace and academic environments, information and communication, goods, services, facilities, and premises.

Scope

2. This Policy applies to:
 - a) all Employees, in their day-to-day work at the University, including those with supervisory responsibilities (refer to Section A: Roles and Responsibilities—Employee Roles: **Employees with Supervisory Roles**), and including those who publish information and engage in public communications (Individual Employees,

Volunteers, Subcontractors: [Information and Communication](#)) deliver [Customer Service](#), and those who buy goods and services on behalf of the University ([Employees Who Buy on Behalf of the University](#));

- b) all persons, organizations, and / or businesses who provide goods, services, accommodation, facilities, and premises on behalf of the University (refer also to the [Procurement website](#));
- c) job applicants and interviewees at the University who may require employment accommodation through the recruitment, assessment, selection, and hiring process; and
- d) all other Community Members, as appropriate, within the scope of their role at, or relationship with, the University.

- 3. This Policy provides a high-level, philosophical framework to guide the University's implementation of the *IASR*, [Accessibility Plan](#), and accessibility priorities, but does not contain operational recommendations or procedures. Such details are contained in the implementation and operational guidance documents published by the Equity and Inclusion Office. Current and future resources and guidance documents can be found on [McMaster's Accessibility Hub](#).

Statement of Commitment

- 4. The University has a shared commitment to meet and exceed, where possible, standards as expressed and defined in the *AODA*, which places legal obligations on organizations to achieve accessibility for Ontarians with disabilities concerning the workplace, living and academic environments (some of which are described in McMaster's [Policy on Workplace Accommodation](#) and [Academic Accommodation of Students with Disabilities Policy](#)), information and communication, goods, services, facilities, and premises.
- 5. The University, and through the direction from the [Administration](#), is committed to:

- a) the frameworks of **Universal Design**, **Accessibility**, and **usability**, as well as the principles of **dignity**, **intersectionality**, **Integration**, **Equal Opportunity**, **Reasonable Efforts**, **Independence**, and **Ongoing Evaluation from the User's Perspective**;
- b) providing services and programming that is inclusive and usable for everyone and which acknowledges that Universal Design in education and learning extends beyond the universal design in the built environment (often fixed and partial);
- c) promoting and striving toward a **Barrier**-free environment for all individuals, including:
- [1] fostering a **culture of accessibility** for persons with disabilities;
 - [2] promoting awareness of the needs and abilities of persons with disabilities, including community awareness-raising and **stigma** reduction education and training efforts;
 - [3] informing the campus community about the services available to persons with disabilities;
 - [4] providing support services that are equitable and accessible; and
 - [5] identifying and removing all forms of barriers consistent with the social model of disability: attitudinal; information or communications; technological; architectural or physical; and organizational or systemic.
- d) understanding the historical, social, and political influences that contribute to **systemic discrimination**, including threats and / or fear of **reprisal**, and understanding the impacts experienced by persons with disabilities as a result of **ableism** and **intersectionality**.

Terms and Definitions

6. A full glossary of terms and definitions may be found in [Appendix A](#). Further terminology is defined within the relevant sections of this Policy.
7. For the purpose of interpreting this document:
 - a) words in the singular may include the plural, and words in the plural may include the singular;
 - b) members of the Administration may, where necessary and appropriate, delegate their authority;
 - c) commonly used terms in this Policy are defined as follows:
 - [1] **Administration**: For the purposes of this Policy, Administration refers to individuals and entities responsible for creating and maintaining an environment that adheres to the AODA and the principles of accessibility and inclusion. A non-exhaustive list includes the President, Provost, Vice-Presidents, Deputy Provost, Vice-Provosts, Associate Vice-Presidents, Deputy Vice-Presidents, Deans, and Associate Deans;
 - [2] **Community Members** include, but are not limited to: [students](#) (graduate, undergraduate, and continuing education), [Employees](#), medical residents, volunteers, [visitors](#) (including visiting professors), and institutional administrators and officials representing McMaster University.
 - [3] **Disability**: Disability has various meanings in medical, social, and human rights contexts. Historically, the University has relied on the definition of disability from the [Ontario Human Rights Code](#) (the "*Human Rights Code*") Section 10. Please refer to [Appendix A: Terms and Definitions: Disability \(OHRC\)](#) for the full definition used in the *Human Rights Code*. The *Human Rights Code* portrays the concept of disability based on a medical model. The University recognizes and encourages using other models that frame and define disability beyond the medical model. For example, the social

model of disability defines disability as a result of socially constructed barriers and discriminatory customs and norms and aims to remove those barriers and prejudicial attitudes. However, to comply with the *Human Rights Code's* definition of disability and accompanying policies and statements, this Policy acknowledges, upholds, and aligns itself with the definition of *disability* in the *Human Rights Code*.

- [4] **Senior Director (HR&A):** Senior Director (Human Rights & Accessibility) in the Equity and Inclusion Office;
- [5] **Employees:** Where applicable, Employee is used to refer to staff and faculty:
- **Faculty:** Academic teaching staff, clinical faculty, and senior academic librarians who are members of the “teaching staff”. Teaching staff as defined in the *McMaster University Act* means the employees of the University or of a college affiliated with the University who hold the academic rank of professor, associate professor, assistant professor, or lecturer.
 - **Staff:** Employees of the University, including, but not limited to, The Management Group (TMG), unionized employees, temporary / casual / interim employees, short-term employees, non-teaching staff, sessional faculty, instructors, Post-doctoral Fellows, and Teaching Assistants.
- [6] **Reprisal:** An action or threat intended as retaliation for claiming or enforcing a right under the *Human Rights Code* or the *Occupational Health & Safety Act (OHSA)*. Community Members have a right to bring forward complaints under the *Code* or *OHSA* without any fear of reprisal.

List of Abbreviations

8. For ease of interpretation, the following are common abbreviations used in this Policy:
- **AODA:** *Accessibility for Ontarians with Disabilities Act*
 - **MAAC:** McMaster Accessibility Advisory Council (previously known as the McMaster Accessibility Council (“MAC”))
 - **EIO:** Equity and Inclusion Office
 - **ICT:** Information Communication Technology
 - **SAS:** [Student Accessibility Services](#)
 - **OBC:** [Ontario Building Code](#)
 - **VPro / AVP EI:** Vice-Provost / Associate Vice-President, Equity and Inclusion
 - **WCAG 2.0:** World Wide Web Consortium [Web Content Accessibility Guidelines 2.0](#)

Policy Review

9. As per the [McMaster University Policy Framework](#), the executive responsible will typically review this Policy every five (5) years. Smaller and more frequent reviews may occur to ensure that this Policy is current and compliant with legislative requirements, current professional standards, and leading practices.

Legislative Framework

The Ontario Human Rights Code

10. This Policy upholds current and ongoing responsibilities and obligations under the *Human Rights Code* prohibiting discrimination and harassment in the five (5) social areas, including employment, housing, services, union and vocational associations and contracts, on grounds of **disability**, as well as the **Duty to Accommodate**. The *Human*

Rights Code is inextricably linked to the *AODA*, particularly through the Duty to Accommodate.

Accessibility for Ontarians with Disabilities Act (AODA)

11. The [AODA](#) is a law that outlines and mandates accessibility standards that public institutions, such as the University, must comply with to facilitate an accessible province for persons with disabilities.

Integrated Accessibility Standards Regulation (IASR)

12. The *AODA* is actioned through five (5) accessibility standards comprising the *IASR*: customer service, information and communication, employment, transportation, and design of public spaces. The [IASR](#) does not replace or affect any currently existing responsibilities under the *Human Rights Code* and / or any legislation currently upholding the right to accommodations for persons with disabilities. Where conflict arises, the most accessible option required under either body of legislation will prevail.

Accessibility Plan

13. The University, guided by the Administration and the McMaster Accessibility Advisory Council (the “MAAC”), will continuously, collaboratively, and iteratively work across non-exhaustive operational areas of procurement, hospitality and customer service, student support, education and educational material development, information and communication, employment, facilities, and the built environment and where applicable, transportation services, to develop and implement an integrative and cohesive [Multi-Year Strategic Accessibility Plan](#). This plan will:
 - a) establish accessibility-related goals and implementation timelines to achieve goals of both *IASR* compliance and accessibility and inclusion aspirations for the campus community;
 - b) be reviewed, at a minimum, every five years, guided by the [VPro / AVP EI](#) with input from the MAAC, and in consultation with Community Members with disabilities;

- c) have progress of measures taken to comply with all AODA regulations to be evaluated and communicated via an [Annual Status Report](#);
 - d) be made publicly accessible from the [Plans](#) section of the Accessibility Hub website;
 - e) be published in an accessible and / or conversion-ready format to provide timely versions to any person with a disability requesting an [Accessible Format](#); and
 - f) be monitored and evaluated for compliance through various accountability mechanisms, including regular institutional data collection.
14. The Equity and Inclusion Office (“EIO”) will create supplemental tools to support the implementation of this Policy and Accessibility Plan. Current and future resources and implementation tools are available in [McMaster’s Accessibility Hub](#).

Section B: Roles And Responsibilities

Employee Roles

Administration

15. The [Administration](#) is responsible for the development and revision of policies and procedures for maintaining accessibility for [Community Members](#) and providing the resources required to support these activities. In addition, the Administration is responsible for enabling Community Members to function with the highest standards of integrity, accountability, and responsibility. Activities may include disseminating information about the Administration's expectations and supporting educational initiatives to all Community Members on issues topics related to [accessibility](#) and inclusion.

Vice-Provost / Associate Vice President, Equity and Inclusion¹

16. The [VPro / AVP EI](#) oversees the [EIO](#), which houses the Accessibility Program.
17. The VPro / AVP EI is the responsible executive for this Policy and the multi-year strategic accessibility plan.
18. The VPro / AVP EI is a co-chair of the [MAAC](#).

Senior Director, Human Rights & Accessibility

19. The Senior Director, Human Rights & Accessibility ("Senior Director (HR&A)") provides supervision and guidance to the Manager of the Accessibility Program.

¹ The role of Vice-Provost, Equity and Inclusion may alternate to, Associate Vice-President Equity and Inclusion when the incumbent is not a tenured faculty member.

Program Manager, Accessibility Program

20. The Accessibility Program Manager coordinates and communicates to the MAAC reporting progress on adherence to the AODA Standards. The Manager is a key consultant and contributor to the MAAC and their additional duties include:
 - a) facilitating, coordinating, and communicating this Policy to relevant stakeholders; and
 - b) managing the AccessMac Program (Accessibility Program), including overseeing AODA requirements currently operationalized within the EIO.

Employees with Supervisory Roles

21. **Supervisors** are required to complete the University's central [AODA and Human Rights Code training](#), and ensure that their **Employees** / direct reports, (including part-time, **student**, and temporary / casual employees), have completed the training; individuals must retake the training every three (3) years. Supervisors may track the training compliance of their direct reports using the details located on the [For Managers: Tracking Training Status](#) website.
22. Supervisors are responsible for sharing information and facilitating processes, including informing Employees about relevant accessibility and accommodations policies (including the [Policy on Workplace Accommodation](#) and the University's [Guide and Procedures On Workplace Accommodation](#)), and Employees' right to accommodation based on the grounds of a **disability**; and
23. Supervisors are responsible for facilitating a supportive and respectful **workplace accommodation** process for employees with disabilities, upon request.

Individual Employees, Volunteers, and Subcontractors

24. All leaders (including student leaders), current and new Employees, volunteers, and subcontractors are required to complete the University's central AODA and *Human Rights Code* training. A record of this training will be tracked, password-protected, and

stored in a secure database that is only accessible to a limited number of EIO Employees and their relevant supervisors.

25. Employees may be required to complete role-based accessibility training, for example, [accessible education training](#) for faculty members, instructors, teaching assistants, and / or other Employees with instructional roles, where identified. Those with instructional roles are encouraged to participate in training to maximize the accessibility of their course content.²
26. Employees that formally request accommodations based on grounds of disability are required to participate in the accommodation process, as per the [Policy on Workplace Accommodation](#) and the [Guide and Procedures on Workplace Accommodation](#).
27. With support from their Supervisors and University departments with expertise in accessible practices, Employees are responsible for contributing to and fostering a **[culture of accessibility](#)** for persons with disabilities, including considering their own accessibility needs, as well as the integration of [leading accessibility practices](#), consistent with the AODA, into the work that they perform.
28. The [Employee Accessibility Network \(EAN\)](#) is available to all Employees who identify as having a disability and / or access disability-related accommodations.

Information and Communication

29. The following requirements apply to web developers, designers, and digital content creators (Employees or external contractors) responsible for any content appearing on a public-facing University website. Additionally, the following requirements apply to those responsible for procuring and managing Information Communication Technology (“ICT”)(e.g., public-facing websites, social media, and McMaster apps):
 - a) Website accessibility currently falls under [Section 14 of the Information and Communications Standard](#), which states that public sector organizations and large

² For more information, visit the Accessibility Hub [Training](#) and [Resources](#) pages. Also, the [Forward with FLEXibility: A Teaching and Learning Resource on Accessibility and Inclusion](#).

organizations shall make their internet websites and web content conform with the World Wide Web Consortium [Web Content Accessibility Guidelines \(“WCAG 2.0”\)](#). The WCAG 2.0 is guided by four overarching digital accessibility principles (“POUR Principles”):

- [1] Content must be perceivable;
- [2] Interface elements in the content must be operable;
- [3] Content and controls must be understandable; and
- [4] Content must be robust enough to work with current and future technologies.

b) All websites and content hosted on University-owned, public-facing websites must be in compliance with [current web accessibility guidelines](#).

c) As per the University’s internal Web Strategy and accompanying web accessibility procedural and implementation guidelines, individuals that are responsible for digital content shall strive for beyond-compliance measures.

d) Essential information and feedback mechanisms published on University-owned, public-facing websites will be provided in [Accessible Formats](#) as prescribed by current web accessibility standards.

30. Within the limits of their role at the University, departments, [Supervisors](#), and [Employees](#) shall communicate and provide information to persons with disabilities in ways that consider their disabilities. Upon request, communication and information that is not academic in nature shall be provided in [Accessible Formats](#) and / or with [communication supports](#). Examples of communication and information that is not academic in nature include, but are not limited to:

- a) details regarding the provision of services;
- b) policies, procedures, or guidelines;
- c) safety / emergency response information; or

d) essential employment-related details.

31. Education-related information and materials shall be provided through the academic accommodation process (refer to the [Policy on Academic Accommodation of Students with Disabilities](#)).

Customer Service: Accessible Goods and Services

32. Where any / all University service units undergo temporary service disruptions, units experiencing service disruption are responsible for following the protocol for [Providing Notice of Temporary Service Disruptions](#).
33. Where any / all University service units provide goods and services to members of the public, units are responsible for:
- a) Following the University's Service Animals policies;
 - b) Being aware of and following AODA requirements regarding the use Assistive Devices and the use of Support Persons in acquiring goods and services for persons with disabilities;
 - c) Communicating with persons with disabilities acquiring goods and services that considers their disability(ies), including the provision of Accessible Formats and Communication Supports; and
 - d) Establishing accessible processes for receiving and responding to feedback about the way units provides goods or services to persons with disabilities. The information about this process will be readily available to the public in an accessible and / or conversion ready-format.

Employees Who Buy on Behalf of the University: Accessible Goods and Services

34. The University, through the direction of Administration, is committed to providing goods and services in a manner that respects the **dignity** and **independence** of persons with disabilities.

35. When procuring or acquiring goods, services, or facilities, it is the responsibility of those making purchases on behalf of the University (Employees) to incorporate accessible features into the purchasing process. If it is not possible and practical to do so, purchasers will provide the Strategic Procurement Office an explanatory justification upon request. Visit the [Accessible Procurement Support website](#) for more details, and for procurement documentation examples, visit the [Accessibility Hub](#).

Individual Community Members

36. All Community Members are responsible for contributing to and fostering a culture of accessibility for persons with disabilities.

Central Unit Roles

37. Accessibility is a shared responsibility across the University's Faculties and Administrative and Operational Units. However, the following central units have specific responsibilities under this Policy.

McMaster Accessibility Advisory Council (MAAC)

38. Senior officers and decision-makers of the University who are responsible for *AODA* compliance and accessibility best practices comprise MAAC.
39. MAAC provides a mechanism for planning, reviewing, and evaluating the implementation of the *AODA IASR* within the University, for example, through cyclical data collection and internal and external reporting.
40. MAAC is responsible for addressing identified **barriers**, developing plans for their removal, and taking steps to prevent future barriers, for example, through institutional endorsement and support of the University's Multi-Year Strategic Accessibility Plan.
41. MAAC reviews its membership regularly and ensures consultation with diverse persons with disabilities, those experiencing **intersectionality**, and other relevant key consulting groups.

Equity and Inclusion Office

42. The [EIO](#), by way of the Accessibility Program, with support of the Administration, is responsible for coordinating the University's proactive educational and training accessibility initiatives and programs, as well as supporting the coordination of provincial accessibility compliance activities. The following regulatory requirements under the *IASR* are coordinated and / or operationalized through the EIO:
- a) facilitating the establishment and review of this Policy and accompanying Multi-Year Strategic Accessibility Plan on behalf of and in consultation with the MAAC, including organizing and facilitating consultation with persons with disabilities and communicating changes to policies and plans to the campus community;
 - b) developing, tracking, and supporting the dissemination of *AODA IASR* training, including:
 - [1] *AODA and Human Rights Code* training;
 - [2] Accessible Education training for instructional staff, carried out in partnership with the [MacPherson Institute](#) via the learning management system; and
 - [3] Role-specific training, where appropriate.
 - c) overseeing and maintaining the central Accessibility Hub, from which the following *AODA IASR* requirements have been operationalized and / or linked to:
 - [1] [Central Feedback Processes for Accessibility](#) in relation to:
 - violations of *AODA* compliance within the areas articulated in *Section 1: Introduction* – [Legislative Framework](#), which may be reported via the Accessibility Hub website under the [Contacts section](#); and
 - improvements to University-wide accessibility.
 - [2] [Service Disruption Template and Posting Procedure](#)

- d) educational Resources for the development of [Accessible Formats](#) and Communication Supports;
 - e) service animal policies (for example, consult [Human Resources Services](#) and [Housing and Conference Services](#) regarding students accessing on-campus housing).
 - f) producing an annual report for the University Planning Committee, the Board of Governors, and Senate, describing its activities as they relate to responsibilities described in this Policy.
43. Individualized impacts of inaccessibility systemic issues of discrimination and harassment based on disability grounds, including Failure to Accommodate, shall be directed toward mechanisms established under the [Discrimination and Harassment Policy](#).

Human Resources Services

44. [Human Resources Services](#) (“HRS”) is responsible for providing strategic counsel and advice, under both the *Human Rights Code* and the *IASR* Employment Standard, namely as it relates to the **Duty to Accommodate** in the Workplace. Specific *IASR* Employment Standard requirements include:
- a) making job applicants aware of the [Workplace Accommodation Policy](#) and access to accommodation (including alternative formants and / or communication supports) during the recruitment process;
 - b) providing consultation on individualized accommodation processes and plans for Employees with disabilities, including individualized [Workplace Emergency Response plans](#), as per the University’s *Workplace Accommodation Policy*;
 - c) guiding and supporting the University Community during the recruitment process the *Workplace Accommodation Policy*, and Implementation Guidelines;

- d) overseeing, facilitating, and documenting McMaster's [Return to Work Program](#), as per [RMM #1002](#), for Employees who have been absent from work due to disabilities, and require disability-related accommodations, using any documented individual accommodation plans as part of the process, in order to return to work; and
- e) providing advice, guidance, and expert support to employers / supervisors in considering the accessibility needs, as well as any individualized accommodations plans, of their Employees.

Student Accessibility Services

45. Student Accessibility Services (“SAS”) is the central resource for disability advising and the development of Accommodation Plans for students with disabilities. SAS is responsible for coordinating the [Academic Accommodations](#) process, which includes:
- a) obtaining and storing relevant disability related information (for example, documentation related to any functional limitation);
 - b) assessing the University’s duty to accommodate; and
 - c) working collaboratively with Faculty Offices, Instructors, students and academic units to inform accommodation decisions and develop Accommodation Plans.

Facility Services

46. Facility Services is responsible for coordinating and / or operationalizing requirements under both *Ontario Building Code (OBC) Barrier Free Standard* and the *AODA IASR Design of Public Spaces Standard*, including:
- a) complying with accessibility laws when building or making major changes to public spaces. Public spaces include:
 - [1] recreational trails and access routes;
 - [2] outdoor public eating areas;

- [3] outdoor paths of travel (for example, sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals); and
 - [4] service-related elements (for example, service counters, fixed queuing lines and waiting areas).
- b) consulting the [Design of Public Spaces Standard for](#) specific accessible design requirements; and
 - c) leading the McMaster Facilities Accessibility Design Standards (MacFADS) committee.
47. Facility Services' [Campus Accessibility Action Plan](#) provides access to the campus community and public regarding Built Environment campus accessibility plans.

Parking Services

48. [Parking Services](#), in collaboration with Facility Services, oversees the operationalization of accessibility requirements under the *AODA IASR* Transportation and Design of Public Spaces Standards, including:
- a) accessible off-street and on-street parking, and;
 - b) the provision of accessible vehicles or equivalent services upon request, where departments provides transportation services (campus shuttles, for example).

University Library

49. The [University Library](#) is responsible for providing alternate formats for students registered with SAS. Library staff are also available to provide advice and support to other members of the University Community, as required.
50. The Library is responsible for operationalizing requirements under the *AODA IASR's* Information and Communication Standard and compliance with the *Copyright Act of Canada* and other relevant legislations, treaties, agreements or conventions (for example, the [Marrakesh Treaty](#)), including:

- a) ensuring that textbooks and all other print-based educational or training supplementary learning resources can be developed and be made accessible and / or conversion-ready for persons with disabilities; and
- b) providing or procuring accessible and / or conversion-ready print, digital and multimedia resources, apart from special collections, archival materials, rare books, and donations.

Strategic Procurement

- 51. [Strategic Procurement](#) is responsible for coordinating and communicating [accessible procurement criteria](#) under the AODA, as well as future accessible procurement requirements, including:
 - a) the development and updating of Request For Quote (RFQ) and Request for Proposal (RFP) templates that include statements of commitment to adhering to AODA procurement requirements, including the integration of accessibility criteria and features into purchasing processes when procuring or acquiring goods or services (refer also to the Accessibility Hub for examples of [accessibility-related procurement documentation](#)).
 - b) if it is not possible and practical to integrate accessibility criteria and features into a purchase, the department or Employee making the purchase will document and provide an explanation to the Strategic Procurement Office upon request.
- 52. The requirements indicated above apply to all purchases of goods and services, including third-party purchases, contractors / sub-contractors, Information Communication Technology purchases, materials for the built environment, etc.

Appendix A: Terms and Definitions

Ableism: A belief system analogous to racism, sexism, or ageism that sees persons with disabilities as being less worthy of respect and consideration, less able to contribute and participate, or of less inherent value than others. Ableism may be conscious or unconscious and may be embedded in institutions, systems, or the broader culture of a society. It can limit the opportunities of persons with disabilities and reduce their inclusion in the life of their communities.

Accessibility: The term accessibility means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product, or environment.

Accommodation: A means of preventing and removing **barriers** that impede full participation and access based on the [prohibited grounds of discrimination](#). Accommodation is initiated when an individual identifies their need to be accommodated, for example, a **disability**-related accommodation. Below are definitions of academic and workplace accommodations; refer to the full accommodation policies for details:

- **Academic Accommodation:** An individual arrangement that reduces or removes **barriers** that limit the ability of **students** with disabilities to participate in formal post-secondary education. Academic Accommodations are developed based on the functional limitation of the student as it relates to the academic environment. Refer also to the University's [Academic Accommodation of Students with Disabilities Policy](#).
- **Workplace Accommodation:** Under the [Human Rights Code](#), employers and unions, housing and service providers have a legal **duty to accommodate** the needs of people who are adversely affected by a requirement, rule or standard. The *Code* requires employers to put an effort, short of undue hardship, to accommodate the needs of persons with disabilities. Accommodation may be temporary or ongoing, with the goal of enabling individuals to compete for jobs and perform the essential duties of their job. Refer also to the University's [Policy on Workplace Accommodation](#).

Accessible Formats and Communication Supports:

Accessible Formats: Other ways of publishing information besides regular print. Some of these formats can be used by everyone, while others are designed to address the specific needs of a user:

- Audio and video files;
- Accessible PDFs;
- Microsoft Word documents that use good semantic structure;
- HTML; and
- Braille.

Communication Supports: Ways for people who cannot access verbal or audio information to receive it visually or ways for people who are non-verbal to communicate with people who speak. Visit the [Accessibility Hub](#) for additional resources. Examples of communication supports could include:

- American Sign Language (ASL) interpretation
- Speechreading
- Captions and Text Transcripts
- Assistive Listening Devices

Barriers: Obstacles that limit access and prevent people with disabilities from fully participating in society. Most barriers are not intentional. Considering the needs of persons with disabilities at the design and development stage of a process may help prevent such barriers.

Culture of accessibility:³ A culture of accessibility recognizes the value of inclusivity, and everything is viewed through the lens of inclusiveness. For example, teams are developed that include people with disabilities. Products and services are designed for accessibility by all users. **Supervisors** fully support the culture of accessibility and ensure all staff have

³ Source: [DiversityCan](#)

access to the resources needed to perform at the highest level. No one in the workplace is left behind because of their **disability**. This is the culture beyond accommodations.

Dignity: How a service is provided in a way that allows the individual to maintain self-respect and the respect of other persons.

Disability (OHRC): The concept of disability may be interpreted in different ways depending on the context, such as medical, social, and human rights. Historically, the University (and the broader society) has relied on the definition of disability from the [Human Rights Code](#) (§10). While this list is not exhaustive, the Human Rights Code includes the following in its definition of disability:

- 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;
- a condition of mental impairment or a developmental disability;
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act*, 1997.

Refer also to [Section A: Terms and Definitions: Disability](#), as used in this Policy.

Duty to Accommodate: Under the *Human Rights Code*, employers and unions, housing providers and service providers have a legal duty to accommodate the needs of people with disabilities who are adversely affected by a requirement, rule or standard. Accommodation is necessary to ensure that people with disabilities have equal opportunities, access, and benefits. The duty to accommodate has both a substantive and a procedural component.

The procedure to assess an accommodation (the process) is as important as the substantive content of the accommodation (the accommodation provided).

Equal Opportunity: How a service is provided to individuals in such a way that they have an opportunity to access goods or services equal to that given to others.

Independence: When a person can complete tasks on their own without unnecessary help or interference from others.

Integration: How a service is provided in a way that allows every individual to benefit from equivalent services, in the same place, and in the same or similar way as other individuals, with as many measures as necessary to enable everyone to access goods or services.

Intersectionality:⁴ The concept of ‘intersectionality’ has been defined as “intersectional oppression [that] arises out of the combination of various oppressions which, together, produce something unique and distinct from any one form of discrimination standing alone”. An intersectional approach takes into account the historical, social and political context and recognizes the unique experience of the individual based on the intersection of all relevant grounds.

Ongoing Evaluation from the User’s Perspective: How well the design of the environment, services and supportive behavior enables functioning, performance, and well-being.

Reasonable Efforts: Taking approaches that meet the required needs of the individual.

Service Animal: Any guide dog, signal dog, or other animal individually trained to provide assistance to a person with a [disability](#). If they meet this definition, animals are considered service animals. A service animal is **not** a pet. Service animals perform some of the functions and tasks that the person with a disability cannot perform for themselves.

⁴ Source: [Ontario Human Rights Commission](#), following M. Eaton, “Patently Confused, Complex Inequality and *Canada v. Mossop*” (1994) 1 Rev. Cons. Stud. 203 at 229.

Stigma:⁵ Stigma is experienced by an individual when they “possess an attribute that marks them as different and leads them to be devalued in the eyes of others”.

Student: A student is any individual recorded by the University Registrar as enrolled in an educational course of study recognized by the Senate and for whom the University maintains education records.

Supervisor: There are various types of supervisors within the University Community, which include the following:

- **Academic Supervisor** who oversees the academic work of a [student](#), the most common example being a faculty member overseeing a graduate student’s academic work;
- **Academic Administrator** is any faculty or staff member acting in their capacity as supervisor / administrator within a Faculty, Academic Department, etc., which includes, but is not limited to, Department Chairs, Deans, or other supervisors who oversee the work of a Community Member (e.g., a faculty member overseeing a post-doctoral fellow / technician; an undergraduate or graduate student performing research in the faculty member’s laboratory); and
- **Workplace Supervisor** is “a person who has charge of a workplace or authority over a Worker” ([Occupational Health and Safety Act](#)). Supervisors are responsible for knowing the Duties of Supervisors under the Act.

Support Person is any person who provides assistance to a person with a [disability](#).

Systemic Discrimination includes policies, practices, and institutional procedures which, deliberately or not, have the effect of creating or perpetuating disadvantage and discrimination against identifiable groups on grounds prohibited by the *Human Rights Code*.

⁵ Source: Brenda Major and Laurie T. O’Brien, “The social psychology of stigma,” *Annu. Rev. Psychol.* 2005 56:393-421 at 395.

Universal Design:⁶ As outlined in the [Human Rights Code](#), effective inclusive design will minimize the need for people to ask for individualized accommodation. The concept of universal design, which requires those who develop or provide laws, policies, programs or services to take into account diversity from the outset, is connected to the principle of autonomy and [independence](#) in that, when properly implemented, universal design removes from persons with disabilities the burden of navigating onerous accommodation processes and negotiating the accommodations and supports that they need in order to live autonomously and independently. In this way, the principle of autonomy and independence is closely linked to that of participation and inclusion.

Usability: The ease of access and / or use of a product, design, or space.

Visitors: Individuals who are not [Community Members](#), Contractors, Lessees or Volunteers, but who want or need to attend University property for conferences, recreation, sporting events, concerts / performances and restaurant patrons. Guests of the McMaster hotel properties are also considered Visitors.

⁶ Sources: [Ontario Human Rights Commission](#) and the [Law Commission of Ontario](#).

Appendix B: Related Policies And Legislation

This Policy is to be read in conjunction with the following policies, statements, legislation, and collective agreements. Any question of the application of this Policy or related policies shall be determined by the Vice-Provost / Associate Vice-President (Equity and Inclusion), or their delegate, and in conjunction with the administrator of the other policy or policies.

The University reserves the right to amend or add to the University's policies and statements from time to time (this is not a comprehensive list).

Related Policies

- [Academic Accommodations of Students with Disabilities](#)
- [Discrimination and Harassment Policy](#)
- [Employment Equity Policy](#)
- [McMaster Campus Accessibility Action Plan](#)
- [McMaster Guide and Procedures on Workplace Accommodation](#)
- [McMaster Policy on Workplace Accommodation](#)
- **McMaster Service Animal Policies:**
 - [RMM #409 Domestic Animals in the Workplace Program](#)
 - [Service Animal Agreement in Residence](#)
- [RMM #1002: Return to Work Program](#)

Legislation

- [Accessibility for Ontarians with Disabilities Act, 2005](#): Integrated Accessibility Standards Regulation
 - [Integrated Accessibility Standard Regulation \(IASR\) Guide](#)

The AODA is implemented on an ongoing basis through Accessibility Standards that have been developed to designate areas, create rules, and provide timelines around enhancing accessibility for persons with disabilities in Ontario. The five Standards under the AODA are articulated in the IASR, which is comprised of five integrated standards.
- [Occupational Health and Safety Act, R.S.O. 1990, c. O.1](#)
- [Ontario Human Rights Code](#)