

Accessibility Policy					
Approval Level:	Board of Governors				
Approval Date:	2026 09 23	Revised Date:	n/a	Review Date:	2027 09
Responsible Portfolio/Unit/Committee:	Administration and Operational Support				
Responsible Officer(s):	Vice President, Finance and Operations				

1.0 Purpose

NOSM University (the University) is committed to ensuring persons with disabilities have equal access and opportunities to participate with dignity and independence. NOSM University believes in integration and is committed to meeting the needs of persons with disabilities in a timely manner by removing and preventing barriers to accessibility. This Policy establishes the principles, governance framework, and institutional commitments to accessibility in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), its regulations and the *Ontario Human Rights Code* (the Code). The University understands that obligations under the AODA and its accessibility standards do not substitute for or limit its obligations under the Code or under any collective agreements. In the event of conflicting requirements between legal obligations related to accessibility, the obligation providing the greatest level of accessibility prevails.

2.0 Scope

This Policy applies to all members of the NOSM University Community. It also applies to all University activities, including but not limited to, employment practices, service delivery, procurement, facilities, information technology and communication.

3.0 Definitions

For the purpose of this policy:

TERM	DEFINITION
Accessible Formats	Formats that accommodate persons with disabilities. As defined in the Integrated Accessibility Standards, accessible formats may include, but are not limited to, large print, recorded audio, electronic formats, braille, and other usable formats for persons with disabilities.
Accommodation	According to the Ontario Human Rights Commission, accommodation means making adjustments to policies, rules, requirements and/or the built environment to ensure

	that people with Code-related needs have equal opportunities, access and benefits at no additional cost to the persons with disabilities.
Barrier	Barrier means anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical, architectural, information or communications, attitudinal, technological, policy, or practice-related barrier.
Communication Supports	As defined in AODA, 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.
Disability	As defined in the Accessibility for Ontarians with Disabilities Act, 2005 and the Ontario Human Rights Code.
Multi-Year Accessibility Plan (MYAP)	The University's publicly available plan that outlines strategies and actions to prevent and remove barriers and meet accessibility obligations under the Accessibility for Ontarians with Disabilities Act.
Service Animal	An animal qualifies as a service animal if it is readily identifiable through visual indicators like a vest or harness, or if documentation from an authorized health professional confirms the need.
Support Person	An individual accompanying a person with a disability to assist with communication, mobility, personal care, or access to goods and services.

4.0 Policy

NOSM University is committed to meeting the accessibility needs of persons with disabilities in a timely manner. The University is committed to identifying, removing, and preventing barriers to accessibility across its policies, procedures, programs, and services. To achieve these objectives, NOSM University's approach to accessibility is guided by the following principles:

- Dignity
- Independence
- Integration
- Equal opportunity

The University will comply with all applicable legislative requirements to accommodate persons with disabilities in accordance with the provisions of the AODA and its associated standards:

4.1 Customer Service

- a) Permit persons with disabilities to use personal assistive devices when accessing services.
- b) Permit persons with disabilities to be accompanied by support persons or service animals. Where a service animal is excluded by law, the University will work with the person to identify another way to access the service.
- c) Notify the public of temporary disruptions in facilities or services used in particular by persons with disabilities.
- d) Receive and respond to feedback on accessibility.
- e) Notify the public of the availability of accessible formats.

4.2 General

- a) Establish accessibility policies.
- b) Develop and post its statement of commitment.
- c) Develop, maintain and review the Multi-Year Accessibility Plan (MYAP) at least every five (5) years with an annual status report posted on its progress on implementing the MYAP.
- d) Incorporate accessibility criteria in the process of procuring goods and services.
- e) Provide and maintain records of training on AODA and its standards.

4.3 Information and Communications

- a) Upon request, provide or arrange for accessible formats and communication supports for information and communications, including educational materials, at no additional cost to the person making the request.
- b) Comply with applicable accessibility requirements for websites, web content and digital communications as required under the Integrated Accessibility Standards Regulation.
- c) Provide accessible library resources.
- d) Provide public emergency procedures and plans.

4.4 Employment

- a) Provide accommodations in the recruitment, selection, and onboarding processes.
- b) Develop individualized accommodation and emergency plans, where needed, for persons with disabilities.
- c) Document the return-to-work process for employees absent due to disability.
- d) Ensure performance management takes employee accessibility needs into account.

4.5 Transportation

- a) Where the University provides transportation services that are subject to accessibility requirements, it will meet accessibility laws.

4.6 Built Environment

- a) Where applicable, ensure public spaces under the University's control are designed and maintained to reduce accessibility barriers.
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5.0 Responsibility

Accessibility is a shared responsibility across NOSM University, and all members of the NOSM University Community are responsible for following and familiarizing themselves with their rights and responsibilities under this Policy and supporting accessibility. All areas of the University are expected to consider accessibility in the programs, services, systems and activities they are responsible for. Specifically:

5.1 NOSM University is responsible for:

- Establishing its commitment to accessibility through this Policy.
- Maintaining an accessible process for receiving and responding to accessibility feedback.
- Providing mandatory training on the *Integrated Accessibility Standards* and the relevant provisions of the Code to all staff, faculty, volunteers, and others who develop policies or provide goods, services, or facilities on behalf of the University. Training will be offered on a timely and ongoing basis, including updates when policies or standards change. Records of all training provided, including the dates and the number of individuals trained will be maintained
- Providing training on document accessibility and the Web Content Accessibility Guidelines (WCAG) to ensure digital platforms and published documents comply with AODA.
- Ensuring compliance, allocate resources, and promote a culture of accessibility.
- Reporting publicly on progress through its Multi Year Accessibility Plan (MYAP).
- Integrating accessibility into decision-making and operations.

5.2 Accessibility Advisory Committee is responsible for:

- Advising the University on accessibility matters.
- Providing input into the development, implementation and monitoring of the Multi-Year Accessibility Plan.
- Reviewing this Policy and making recommendations regarding accessibility priorities and compliance.

5.3 University Policy & Regulatory Compliance is responsible for:

- Administering this policy and working collaboratively with Human Resources to maintain training records.
- Monitoring legislative and regulatory changes and recommending policy or procedural updates as required to ensure alignment with legislative requirements.
- Coordinating and maintaining records required to demonstrate compliance with accessibility legislation.
- Preparing and submitting required accessibility compliance reports and related regulatory filings on behalf of the University.

6.0 Review

This Policy will be reviewed within one year of approval and every three years thereafter, or sooner as required by legislative or operational changes.

7.0 Related Documents

Related University Documents

- Human Rights and Anti-Discrimination Policy and Procedure
- Workplace/Learner Accommodation Policies and Procedures (as applicable)
- Alternate Work Arrangements Policy (if applicable)
- Accessibility Procedures (as applicable)

External Legislation, Regulations and Standards

- Accessibility for Ontarians with Disabilities Act (AODA), 2005
- Ontario Human Rights Code
- Integrated Accessibility Standards Regulation

8.0 Getting Help

Questions regarding interpretations of this document should be directed to the Director, University Policy & Regulatory Compliance at email: accessibilityfeedback@nosm.ca
