



Carleton University
Academic Staff Association

June 25, 2026

Department of Equity and Inclusive Communities
Carleton University
Ottawa, ON K1S 5B6

Re: Revised Accessibility for Persons with Disabilities Policy

Dear members of the Department of Equity and Inclusive Communities (EIC) and Senior Management Policy Committee,

On behalf of CUASA, I would like to submit this letter to provide feedback on the revised Accessibility for Persons with Disabilities Policy. This feedback was prepared in collaboration with CUASA's Grievance & Arbitration Officers, Equity and Member Services Officer, and CUASA Accessibility and Disability Caucus.

CUASA acknowledges the care that has gone into updating the document and Carleton's stated commitment to move beyond minimum compliance. As we know, accessibility work at a university must go beyond meeting legal requirements and entitlements. Accessibility has a real and substantial impact on whether students, staff, faculty and librarians, visitors, and community members with disabilities can participate in and on the campus with autonomy, dignity, respect, and belonging. Considering Carleton's foundational purpose as established under the [Carleton University Act](#), accessibility should always be understood as central to the University's mission. The advancement of learning and the betterment of the University community cannot be meaningfully achieved when people with disabilities face preventable barriers when accessing the University.

While we at CUASA appreciate the University's commitment to move beyond minimum compliance, the current draft still falls short of a disability justice-centred policy. A policy that aims to position Carleton as a leader must do more to proactively identify and remove barriers to access and it must not place the burden of access on people with disabilities when that is an employer/University obligation.

We are offering the following nine suggestions in that spirit. Some are technical corrections, others more substantive suggestions. Altogether, they seek to make the policy clearer, more accountable and better aligned with frameworks of disability rights and disability justice.

1. Explicitly state that the policy does not override rights under applicable collective agreements

The draft applies broadly to students, faculty, staff, contractors, visitors, and guests, but it does not clearly explain how the policy interacts with collective agreements. Article 5.3 of the CU-CUASA Collective Agreement provides that academic staff have the right to CUASA representation at meetings about accommodation requests and that accommodations may include alterations of workload as well as the means by which academic staff can meet tenure, confirmation, promotion, and Career Development Increments.

This policy should name these rights directly, or at minimum include a clear clause stating that *“For employees covered by a collective agreement, this Policy will be interpreted and applied in a manner consistent with the applicable collective agreement. Nothing in this Policy limits or replaces rights, processes, representation rights, or grievance and arbitration rights under an applicable collective agreement.”* Without such language, the policy risks creating confusion for academic staff, particularly where the draft directs “staff” to Human Resources without also acknowledging CUASA rights.

2. Follow autonomy-centred principles

Upon reading the policy, one of the members of the CUASA Accessibility and Disability Caucus pointed that “independence” does not equate “autonomy.” Disability justice advocates have long argued for the understanding that no one is truly “independent”: when people seem not to be disabled (as a verb) by society, it is because they count on structures and supports that allow an illusion of full independence. Most refer to the example of stairs which enable one person to access a building while cutting off access for another. The person climbing the stairs is utilizing an accommodation (they are not jumping into the building on their own), but the accommodation is so normalized and automatic that it is invisible. “Autonomy,” however, suggests that the right to self-determination, choice, and dignity is not tied to full “independence.”

Access is often relational, and concepts such as autonomy, self-determination, and interdependence better reflect disability justice frameworks and avoid implying that the highest form of access is doing everything alone.

3. Revise the service animal section

The current draft of the Accessibility for Persons with Disabilities Policy says that service animals must be registered and issued an identification card with the University when, **under the [Accessibility for Ontarians with Disabilities Act](#), service animals do not need to have certificates or identity cards**. We understand that Carleton may have a legitimate interest in voluntary registration for planning, emergency response, and residence logistics. That, however, does not allow making the Carleton-issued identification card a *condition* of access. The policy should say that registration is encouraged, but that lack of a University-issued card will not be used to deny access where the animal meets the legal standard for a service animal.

4. Strengthen the commitment to consult people with disabilities in all stages

The tracked change version of the document appears to remove earlier language stating that people with disabilities would be consulted in the development and updating of the Accessibility Plan. The consultation page itself shows that feedback is being gathered, which is welcome, but a one-time consultation process is not the same as ongoing accountability lead by people with disabilities. **People with disabilities are experts in their own access needs and must be involved in decisions that impact their participation at Carleton**. This principle is enshrined in Article 29 of the 2006 United Nations Convention on the Rights of Persons with Disabilities (UNCPRD), in the making of which Canada played a progressive and engaged role.

5. Shift the policy away from self-identification toward proactive barrier removal

Several parts of the draft rely on people with disabilities having self-identified, self-registered, requested support, or contacted the correct office. These pathways are important, but they are not enough. Many people don't disclose disability for good reasons, including stigma, privacy, fear of career consequences, fear of being disbelieved, immigration or employment precarity, previous institutional harm, or simply because they do not yet know what they need.

A strong accessibility policy should say that the University has an institutional responsibility to identify, remove, and prevent barriers proactively. This includes accessible communications, event planning, classrooms and workspaces, digital platforms, and plain language where appropriate, inclusive emergency planning, and regular review of physical and administrative barriers. People with disabilities should not have to individually request access every time the University creates a new form, process,

event or talk, room booking, website, or training module. To use the language of the preamble of the UNCRPD, it is a matter of “*Emphasizing the importance of mainstreaming disability issues as an integral part of relevant strategies of sustainable development.*”

6. Strengthen the service disruption process

The draft states that service disruption information will be sent to several offices or groups, which will then send the information to people with disabilities who have self-identified. That cannot be the only pathway. Service disruptions impact visitors, new employees, new students, people with temporary or episodic disabilities, people who do not want to disclose, and people who are not connected to the listed offices. They also impact people who may not identify as disabled but still need accessible routes, elevators, seating, washrooms, transit connections, or quiet space.

The policy should require broad, multi-channel notice for both planned and unplanned disruptions. Notices should be posted at the point of disruption, on relevant websites, in the Carleton Mobile app, on accessible campus maps where possible, and through building notices or email lists where appropriate. The notice should include the nature of the disruption, expected duration, accessible alternatives, contact information, and information about how to request support. A one-day minimum for planned disruptions is also too limited. Instead, the University might want language closer to “as early as possible and, where practicable, no less than one day in advance.”

7. Clarify the role of medical documentation

The draft defines “registered and regulated health professional,” but it does not clearly explain when that definition is used or what kind of documentation may be requested. This could unintentionally encourage over-documentation. The policy should state that Carleton will request the least intrusive information necessary to understand disability-related needs and implement accommodations. In most cases, that means information about functional limitations, restrictions, prognosis where relevant, and accommodation needs, not diagnosis or detailed treatment history.

This point is especially important for people with psychiatric, neurodivergent, chronic, episodic, fluctuating, or invisible disabilities. Documentation processes can become a barrier in themselves. When the process is too medicalized, too expensive, or too suspicious/critical in tone, people who need accommodation may delay seeking it or avoid

it entirely. The policy should make clear that privacy, dignity, and trust are part of accessibility, and that the University will “*protect the privacy of personal, health and rehabilitation information of persons with disabilities on an equal basis with others.*” (UNCRPD, Article 22)

8. Add explicit language about no reprisal

The CU-CUASA Collective Agreement includes protection from retaliation or reprisal for members seeking accommodation. The University-wide policy should include similar language. People with disabilities should not have to wonder whether requesting accommodation will impact how they are perceived, evaluated, promoted, assigned work, included in opportunities, or treated by supervisors, colleagues, instructors, or service providers.

We recommend adding a general and explicit statement that no person will be penalized, disciplined, disadvantaged, or subjected to reprisal for requesting accommodation, using an assistive device, using a service animal, being accompanied by a support person, providing accessibility-related feedback, or making a complaint under the policy or related human rights processes.

9. Fully resource accessibility implementation without unduly downloading it on workers as invisible labour

A policy that promises accessibility but does not address workload can create new problems. In the academic context, accessibility work often lands on individual faculty, instructors, librarians, support staff, and workers with disabilities themselves. That can include repeated one-off accommodations, inaccessible technology workarounds, extra student support, formatting and captioning labour, room changes, urgent problem-solving, and administrative follow-up.

The CU-CUASA Letter of Understanding on workload recognizes the need to examine administrative factors, academic supports, increased student accommodations, and the University’s legal duty to accommodate students and employees. The Accessibility Policy should be consistent with that concern. It should say that accessibility is a shared institutional responsibility requiring adequate staffing, training, technology, funding, and administrative support. Leaving the practical labour of accessibility unsupported risks hollowing out the commitment of the University to the principle of accessibility.

In closing, CUASA would like to emphasize that this feedback is offered in support of the policy's stated goals. Carleton's commitment to accessibility will be most meaningful if the policy is clear, rights-based, practical, and accountable. The current draft contains useful language, particularly its commitment to removing systemic barriers and its recognition of dignity, inclusion, and collective responsibility. The next step is to make those commitments harder to misinterpret and easier to enforce.

A stronger policy would not leave people with disabilities to carry the weight of accessibility one request at a time. It would make accessibility an integral part of how the University designs systems, allocates resources, evaluates decisions, and understands community membership. That is the difference between a policy that says disabled people are welcome and a policy that, to use President Tettey's framing, shows them that the University belongs to them as well.

Thank you for considering this feedback.

Sincerely,

Dominique Marshall
President,
Carleton University Academic Staff Association

CC: Carleton University Labour Relations