

 DALHOUSIE UNIVERSITY STUDENT ACCOMMODATION POLICY	<i>Policy Sponsor:</i> Provost	<i>Approval Date:</i> Senate: February 10, 2014 Board: June 24, 2014
	<i>Responsible Unit:</i> Vice-Provost Student Affairs (Student Accessibility Centre) Associate Vice- President Academic (Centre for Learning & Teaching)	<i>Revisions:</i> Senate: October 27, 2014 November 27, 2017 June 11, 2025 Board: November 25, 2014 October 16, 2018 June 24, 2025 University Secretary (as delegated): April 25, 2019

A. Background & Purpose

Dalhousie University is committed to inclusive education, spaces, services, policies, and communities where every Student can meaningfully engage with and fully participate in the university environment with respect and dignity. The inclusion of Students with disabilities is essential to advancing institutional equity, enriching academic excellence, and cultivating a truly representative and thriving learning environment. This policy forms part of a broader, ongoing commitment to create a fully accessible university community, and acknowledges that, through dialogue, education and capacity building, Dalhousie can better understand and respond to the nature and extent of Barriers to accessibility. It is the responsibility of every member of the Dalhousie University community to be knowledgeable of institutional policies and practices related to accessibility including the

commitments under Dalhousie's Accessibility Plan, legislative frameworks, and student accommodation procedures.

Acknowledging that Accommodations are intended to reduce or eliminate Barriers to participation in University Activities, pursuant to our commitments to inclusive excellence and to our obligations under human rights legislation, Dalhousie University will make reasonable efforts to understand Barriers Students may face in accessing and engaging in University Activities, and commits to proactive design of programs, policies, practices, services, and infrastructure to mitigate Barriers where possible, in alignment with our broader Accessibility Plan. Additionally, through this policy, we are committed to providing Accommodations for Students experiencing a Barrier due to characteristic protected by human rights legislation, and to establish a framework for managing requests by Students for Accommodation in an appropriate and timely manner.

Inclusive excellence is a shared responsibility and one where the provision of Accommodation for Students who require them necessitates Students, instructors, service providers and others as appropriate to work together to identify reasonable Accommodations.

B. Application

1. Policy Mandate and Scope

This policy applies to Academic Activities and Non-Academic Activities engaged in by Students at, on behalf of, in connection with, or under the auspices of Dalhousie (collectively "University Activities"). While this policy involves Accommodations for Students only, this policy applies also to faculty, staff, and administrative leaders involved in the provision of or participation in University Activities in relation to their roles in discharging the university's obligations to accommodate Students.

This policy does not include academic relief or flexibility related to compassionate or non-protected grounds, which are managed through student declarations of absence, grading policies, and instructor discretion and/or practices outlined within specific course syllabi. This policy also does not apply to accommodations required by Students engaging in employment with Dalhousie.

This policy does not supersede or replace occupational accessibility, health and safety policies which would guide workplace accommodation processes for Students engaging in work integrated learning activities such as cooperative education, work placements, and clinical placements. Dalhousie will work collaboratively with partner employers and Students in these instances to facilitate supports under applicable organizational policies and frameworks.

Meeting accommodation requirements outlined within this policy does not preclude members of the Dalhousie community from striving toward further barrier reduction, and building a fully accessible campus community, including through aspirations laid out in Dalhousie's Accessibility Plan, and other policies connected to the Student Accommodations Policy as laid out in section E.6.

Allegations of discrimination by faculty, staff, other campus service providers, and employers are

addressed under the Statement on Prohibited Discrimination. Allegations of discrimination by Students are addressed under the Code of Student Conduct.

2. Roles and Responsibilities

- a. **Students** are responsible for requesting an Accommodation, engagement with accommodations process through the Student Accessibility Centre, and timely communication with faculty when Accommodations are required in a course setting.
- b. **Student Accessibility Centre (SAC):** staff at the SAC (including accessibility advisors at other campuses e.g. Truro) are responsible for the review of requests for Accommodation submitted by Students, including the assessment of the Barrier and/or Functional Limitations (based on appropriate documentation or evidence-based assessment of Student need) recommended Accommodations, and development of an Accommodation Plan (at a degree / institutional level). The SAC is responsible for confidentially maintaining all personal health information and private information utilized for the identification of appropriate Accommodations. Staff at the **SAC** are also responsible for consulting with faculty, the Centre for Learning and Teaching, other campus services providers and employers (e.g., fieldwork, co-op/WIL, practicum, internship) to identify appropriate strategies to implement relevant Accommodations within their class, and service or work environment when requested. The **SAC** may also facilitate the provision of tools, resources (e.g., assistive technology), and coordination of alternative spaces (e.g., accommodated exams) directly required to support a Student.
- c. **Course Instructor / Faculty** are responsible for the implementation of Accommodations relevant to a particular course context. This should be done while meeting course learning outcomes and competencies and while respecting the privacy rights of Students receiving Accommodation supports. Faculty will engage with Students, and campus supports through the SAC, and/or Centre for Learning and Teaching, to explore reasonable strategies to implement an Accommodation, or explore alternatives for barrier reduction within their specific disciplinary or course context. In instances where a Faculty has identified a specific role to support coordination and implementation of Accommodations, that role may take on aspects of the course instructor / faculty role as defined above.
- d. **Centre for Learning and Teaching (CLT):** the CLT is responsible for development of the Accessible Course Design Policy and its associated resources; capacity building for development of more accessible courses and learning environments with faculty and unit heads; and when required, consulting with faculty, in collaboration with SAC, to meet specific Accommodation needs within specific disciplinary or course learning environments as required.
- e. **Service providers** for Non-Academic Activities at Dalhousie are responsible for the implementation of Accommodations relevant to a particular service or non-academic context. Service providers are responsible for consulting with the Student and the SAC when required to identify strategies to implement an Accommodation, or explore

alternatives for barrier reduction within their specific service delivery or non-academic context.

- f. **Unit Leads** include both Academic Unit Leads and Heads of Service Units. **Academic Unit Leads** (Program Directors, Chairs, Assistant and Associate Deans) are responsible for monitoring trends in accommodation needs and identification of barrier reduction opportunities from a program design and curriculum perspective, with support from the CLT and data insights from the SAC. This includes the potential for inclusive education activities that enable accessibility needs to be met within classroom or program environments, and identification and implementation of additional supports for faculty to enhance accessibility. Heads of Service Units are similarly responsible for monitoring trends in accommodation needs and identification of barrier reduction opportunities within their units. Academic Unit Leads and Heads of Service Units are also responsible for responding to immediate concerns from Students about implementation of Accommodations related to Academic Activities and Non-Academic Activities, respectively, and collaborating with instructors or service providers, Students, and the SAC to identify reasonable resolutions (including through the informal dispute resolution process).
- g. **Academic Technology Services / Information Technology Services: ATS/ITS** are responsible for the development and implementation of enterprise software tools to enable Student accommodation and improved accessibility through universal barrier reduction (e.g., captioning, transcription, notetaking and recording technologies), and to collaborate with faculty, academic unit heads, SAC and CLT to identify specific solutions in instances where enterprise systems do not meet unique needs.
- h. **Human Rights and Equity Services:** is a neutral office available to university community members who have concerns that this policy or actions associated with it have been applied in a discriminatory manner, as outlined in Dalhousie's Statement on Prohibited Discrimination.
- i. **Administrative Head:** Administrative Heads are responsible for resolving disputes regarding the implementation of Accommodations as outlined in Section F.6., and are defined as follows:
 - i. **Vice Provost Student Affairs:** The Vice Provost Student Affairs is responsible for responding to formal appeals on the Accommodation Plan as outlined in Section F.6.a. The Vice-Provost Student Affairs may designate the Assistant Vice-Provost Student Engagement and Success to act in their place.
 - ii. **Provost and Vice President Academic:** The Provost is responsible for responding to formal appeals on the implementation of an Accommodation Plan as outlined in section F.6.b. The Provost and Vice-President Academic may designate the Associate Vice-President Academic to act in their place.

C. Definitions

In this Policy:

1. **“Accommodations”** are adaptations to the delivery and assessment of learning or services, designed to remove Barriers that are not meaningful to learning, or demonstration of the learning and competencies required for a course or program. In the context of non-academic activities, Accommodations remove Barriers to accessing a service or facility. Accommodations could be temporary (time-limited) or permanent. Accommodations do not include modifications, or academic relief, flexibility, or consideration, which are defined below:
 - a. **“modifications”** are changes that would undermine accomplishment of learning outcomes or demonstration of competencies required for a specific course or program, are different than accommodations, are not required or encouraged by this policy, and would not be recommended from a learning perspective.
 - b. **“academic relief, flexibility or consideration”** for short-term illness, compassionate relief, and reasons related to other non-protected grounds are not formal accommodations and take place at the discretion of the instructor and in alignment with Dalhousie’s broader academic policies.
2. **“Accommodation Plan”** is a written document that identifies a Student’s approved Accommodations and outlines the steps course instructors and/or service providers must take to implement those Accommodations. Accommodation Plans are determined after a barrier grounded in a protected characteristic has been confirmed, and in the case of Disability-based Barriers, after an assessment of the Student’s Functional Limitations.
3. **“Barriers”** are defined as physical, attitudinal, technological, structural, or systemic obstacles that prevent full participation in academic or non-academic activities at Dalhousie.
4. **“Disability”** includes a physical, mental, intellectual, learning, or sensory impairment, including an episodic disability that, in interaction with a Barrier, hinders an individual’s full and effective participation in society.
5. **“Functional Limitations”** are the specific cognitive, sensory, physical, or mental health-related limitations a Student might experience due to Disability which create Barriers to their full engagement in academic or non-academic activities at Dalhousie.
6. **“Protected Characteristics”** are specific grounds conferring protection from discrimination under the applicable legislation. For Nova Scotia, these include age, race, religion, creed, ethnic origin, sex, sexual orientation, physical disability, mental disability, family status, marital status, source of income, irrational fear of contracting an illness or disease, gender identity, gender expression, political belief, and association with protected groups or individuals.
7. **“Retroactive Accommodations”** are Accommodations that are requested and granted after an Academic Activity or Non-Academic Activity has taken place.

8. **“Student”** refers to a person registered in or enrolled at Dalhousie in any academic work or placement for a program that leads to the recording and/or issue of a mark, grade or statement of performance in a university-recognized student information system but excludes residents in postgraduate medical or dental education programs.
9. **“Undue Hardship”** is the high legal standard where accommodating a Student who is experiencing a Barrier due to a Protected Characteristic would create a significant burden or difficulty for Dalhousie. This could include involving excessive financial costs or health and safety risks.
10. **“University Activities”** are all activities engaged in by Students at, on behalf of, in connection with, or under the auspices of Dalhousie. They include:
 - a. **“Academic Activities”** which include all forms of teaching, learning, and assessment of learning (including exams, quizzes, presentations, structured clinical examinations, research papers, and milestone evaluations) in physical, online or hybrid environments, and in university-facilitated experiential learning activities; and
 - b. **“Non-Academic Activities”** which include non-academic programs and services across Dalhousie, including housing and co-curricular activities.

D. Policy

1. Students experiencing Barriers to participation in an Academic Activity or Non-Academic Activity due to a Protected Characteristic under human rights legislation are entitled to Accommodation to reduce or eliminate such Barriers as set out in this Policy.
2. All members of the university community will work to ensure that Dalhousie discharges its legal duty to accommodate through the approval and implementation of Accommodations in a manner that supports the Student’s dignity, focuses on their ability to be fully successful, and protects their right to privacy.
3. Students are encouraged to request Accommodation where they believe that they are experiencing a Barrier to participation in a University Activity, due to a Protected Characteristic, which may be reduced or eliminated through accommodation.
4. All requests for Accommodation shall be made by the Student to the SAC in accordance with this Policy and the Procedures established by the SAC. In submitting such requests, Students are not obligated to disclose a specific diagnosis or personal health information, aside from supporting documentation from appropriate professionals required to determine Functional Limitations or to establish that a Protected Characteristic applies to them that inform Accommodations.
5. Retroactive Accommodations may be granted in circumstances that meet one or more of the conditions:

- a. Functional Limitations were present in early onset without a Students' full awareness at the time of the Academic Activity or Non-Academic Activity;
 - b. Accommodations initially provided were insufficient, as demonstrated by new or emerging evidence (including instances where Students are insufficiently; accommodated during an appeal process); and/or,
 - c. When the presence of Functional Limitations prevented a Student from having the capacity to navigate the accommodations process at the time and a Student has made reasonable attempts to seek an Accommodation.
- 6. Accommodation Plans will be reviewed when there is a change in Functional Limitations, a new Barrier is identified, or when there are significant changes to a Student's academic or non-academic university activities.
- 7. Accommodation Plans and the implementation of Accommodation Plans may be appealed by the Student in accordance with the procedures set out below.
- 8. All documentation relating to a request for Accommodation, including supporting documentation, shall be treated as strictly confidential within the SAC, and shall not be disclosed to other persons without the consent of the Student requesting the Accommodation, except to the extent that such disclosure is necessary for the effective development of the Accommodation Plan, implementation of the Accommodation Plan or appeal of that decision.
- 9. Nothing in this Policy or Procedures shall take away from the Student's right to seek support through Dalhousie's Human Rights and Equity Services or the applicable Human Rights Commission.

E. Administrative Structure

- 1. **Authority:** This Policy and Procedures falls under the authority of the Provost and Vice-President Academic. The Vice-Provost Student Affairs, through the SAC, and the Associate Vice-President, through the CLT are responsible for the day-to-day administration of this Policy and Procedures.
- 2. **Guidelines and Protocols:** Guidelines and Protocols associated with this Policy and Procedures will be centrally published to facilitate effective implementation of Accommodations.
- 3. **Record-keeping:** The SAC shall track and gather data relating to Accommodations including requests, appeals, and Accommodation Plans, and other matters relating to Student accommodation.

4. Reporting: SAC shall deliver an annual report to the Senate Committee on Learning and Teaching through the Vice-Provost Student Affairs and Associate Vice-President Academic, which will include:
 - a. Number of accommodation requests;
 - b. Representation of the nature of the requests for Accommodation and program of study (for Academic Activities);
 - c. Number of appeals and summary of decisions; and
 - d. Any service challenges, trends or other issues presented.
5. Ongoing Training: Employees involved in administering this Policy and Procedures will participate in regular and relevant training including but not limited to human rights, and inclusive and effective practice in student accommodation and accessibility.
6. Related Resources and Policies:
 - a. Related Resources:
 - i. Centre for Learning and Teaching
 - ii. Human Rights & Equity Services
 - iii. Dalhousie Student Advocacy Service
 - iv. Dalhousie Student Health & Wellness Centre (for Students)
 - v. Ombudsperson (independent and impartial support)
 - vi. Nova Scotia Human Rights Commission
 - b. Related Policies and Procedures:
 - i. Classroom Recording Protocol
 - ii. Dalhousie Accessibility Plan
 - iii. Dalhousie Information Technology Acceptable Use Policy
 - iv. Dalhousie Privacy Policy
 - v. Dalhousie Records Management Policy
 - vi. Faculty and Staff Guide to Student Accommodation and Student Accessibility
 - vii. Missed or Late Academic Requirements due to Student Absence
 - viii. Accessible Course Design Policy (under development)

F. Procedures

1. Request for Accommodation: A request for Accommodation shall be made by the Student to the SAC prior to the University Activity in question in accordance with Guidelines and Protocols established by the SAC.
2. Preliminary Assessment: The SAC shall make a preliminary assessment of the request to determine the nature of the Barrier experienced by the Student and the connection of that

Barrier to a Protected Characteristic. If both can be established, then the request will proceed. If one or both cannot be established, the Student's request for Accommodation will be denied.

3. Factors to be Considered: Where an Accommodation is to be provided, it must be reasonable and not create Undue Hardship. The relevant factors to be taken into account in determining a reasonable Accommodation will include, but are not limited to, the following:
 - a. Linkage – whether the proposed Accommodation will have the practical effect of eliminating or reducing the identified Barrier;
 - b. Safety – whether the proposed Accommodation would pose a safety risk to faculty, staff, or other Students or to the Student seeking Accommodation;
 - c. Financial Considerations– whether the anticipated expenses (estimated out-of-pocket expenses to put the Accommodation in place together with any long-term expenses to sustain the proposed Accommodation), are likely to be cost-prohibitive;
 - d. Size and nature of the program or service – whether the proposed Accommodation would be exceedingly disruptive to the program or service, taking into consideration the number of Students, faculty, staff, and others affected as well as the nature and inter-relationships of their roles;
 - e. Impact on academic requirements – whether the proposed Accommodation will substantially undermine the academic competencies or learning outcomes of the course or specific learning experience; and
 - f. Availability of Reasonable Alternatives – recognizing the unique structure and demands within different academic disciplines and university activities, instructors and service providers may identify reasonable alternatives to identified Accommodations that remove the same Barrier and may seek support from SAC and/or CLT to do so.
4. Consultation and Development of Accommodation Plan: Having regard for the factors set out in section F.3, and following consultation with the Student, and as appropriate to the individual circumstances, with:
 - a. In the case of Academic Activities, the faculty representative responsible for liaising with the SAC about Accommodations in the Student's home faculty;
 - b. the administrator responsible for the University Activity in question;
 - c. CLT; and/or,
 - d. others that may be warranted by the circumstances;

the SAC will decide what Accommodations may be required by the Student during their participation in Academic Activities and Non-Academic Activities and will prepare a written Accommodation Plan. Faculty and Service Providers will then have the opportunity to consult with the SAC and/or CLT regarding appropriate approaches to implementing Accommodations within their specific course or service environment on receipt of a Student's Accommodation Plan. These consultations are focused on appropriate implementation of Accommodations or reasonable alternatives within the specific course or non-academic context, not on the specific contents of the Accommodation Plan itself.

5. Dissemination of Accommodation Plan: The Student's Accommodation Plan will be shared directly with the Student, course instructors and service providers in accordance with Guidelines and Protocols established by the SAC.

6. Dispute Resolution: This section provides for the fair, orderly and expeditious resolution of concerns related to (a) the denial of a Student's request for Accommodation or a Student's Accommodation Plan and (b) how the Accommodation Plan is implemented by course instructors and service providers.

a. Concerns about the Denial of a Request for Accommodation or the Accommodation Plan:

i. Informal Process:

If a Student has concerns about the denial of their Accommodation request or the content of their Accommodation Plan, the Student should attempt to resolve the concerns through informal discussions with their SAC advisor, and/or the SAC department leader.

ii. Formal Appeal Process:

i. If a Student's objection cannot be resolved informally, the Student may appeal the decision by filing a written appeal to the Vice-Provost Student Affairs within 10 calendar days of concluding the informal process. The SAC will be given 10 calendar days to respond to the appeal. Thereafter, the Vice-Provost Student Affairs or their designate may uphold, reverse, or modify the original decision to deny the request for Accommodation or the contents of the Accommodation Plan. The Vice-Provost Student Affairs or their designate's decision is final and cannot be appealed further.

b. Concerns about Implementation of the Accommodation Plan

i. Informal Process:

i. If a Student disagrees with how a course instructor (in the case of an Academic Activity) or how a service provider (in the case of a Non-Academic Activity) is implementing their Accommodation Plan, the Student should attempt to resolve the matter through informal discussions with the course instructor or service provider.

ii. If a Student is unable to resolve their concerns with how their Accommodation Plan is being implemented through discussions with their course instructor, supervisor or relevant service provider, the Student should consult with the SAC, who may then involve the course instructor, CLT or service provider's administrative head (Program Director, Chair or Dean's office) in

seeking to resolve the concerns.

- ii. **Formal Appeal Process:** If a Student's objection cannot be resolved informally, the Student may appeal the decision by filing a written appeal to the Provost and Vice-President Academic within 10 calendar days of concluding the informal process. The Provost and Vice-President Academic may designate the Associate Vice-President Academic to act in their place. The Provost and Vice-President Academic or designate will give the course instructor or service provider 10 calendar days to respond to the appeal. Thereafter, the Provost and Vice-President Academic or their designate may uphold or modify the proposed implementation of the Accommodation Plan by a course instructor or service provider. The Provost and Vice-President Academic or their designate's decision is final and cannot be appealed further.