



Sept 21, 2022

Santa J. Ono, President and Vice-Chancellor of the University of British Columbia
7th Floor, Walter C. Koerner Library
1958 Main Mall
Vancouver, BC Canada V6T 1Z2

cc: Dr. Ainsley Carry, Dr. Gage Averill, Mrs. Marcia Buchholz, Dr. Lesley Cormack, Mr. Dale Mullings, Mrs. Nancy McKenzie, Dr. Arig al Shaibah

Dear President Ono,

Calls to Action to Enable Meaningful Implementation of the *Accessible British Columbia Act*

Acknowledgements

We would first like to acknowledge that the UBC Point Grey (Vancouver) campus and the UBC Okanagan campus sits on the traditional, ancestral, unceded territory of the xʷməθkʷəy̓əm (Musqueam) First Nation and the unceded territory of the Syilx (Okanagan) Peoples, respectively. For millennia, this land has been a place of learning for these nations. In our actions to decolonize UBC, it is important to recognize that disability is a colonial construct and that ableism and colonization go hand in hand. In order to challenge ableism, we must also decolonize and Indigenize our understanding of disability.¹

In 2021 the Government of British Columbia enacted the *Accessible British Columbia Act* and recommitted itself to ensuring that people with disabilities² in BC have access to the equal opportunities guaranteed to them by the *BC Human Rights Code* and *The Canadian Charter of Rights and Freedoms*. This *Act* requires the University of British Columbia to establish an accessibility committee who will assist UBC to identify, remove, and prevent barriers that are limiting people with disabilities' full inclusion into academic life.

¹For more information on the intersection between colonization and ableism, please see:

<https://disabilityvisibilityproject.com/2020/07/19/decolonization-as-a-strategy-for-accommodating-disabilities/>

² This document uses person-first and disability-first language interchangeably. We acknowledge the contention around the use of "people with disabilities" vs. "disabled people." Many of the authors of this document use disability-first language when referring to themselves, but we want to acknowledge and support the autonomy of every individual to use any language that best represents their identity and lived experience. We have opted to use both interchangeably in an attempt to respect the widest range of experiences and opinions.

Concurrently, many voices at UBC have been calling for institutional change to improve the treatment of people with disabilities. The Student Societies of UBC highlighted the need to commit institutional resources towards addressing systemic ableism and supporting disabled students. The Disability Affinity Group was created to advocate for disabled employees. These voices that represent disabled community members have called for a Disability Task Force. And the Learning and Research Committee leadership of the Board has expressed interest in addressing disability inclusion as an institutional responsibility and strategic priority. This is in acknowledgement that UBC must live up to the commitments made in the Inclusion Action Plan.

In light of these two events, a group of disabled UBC students have pooled their lived experiences to create eight Calls to Action that we believe must be acted upon in order to start addressing the systemic ableism at UBC. We hope this document will be the beginning of an ongoing conversation between UBC's administration and the disabled student body. This document is endorsed by the Disabilities United Collective, the UBC Law Disability Alliance, the Disabled Graduate Students Association, and the UBC Alma Mater Society – all of which represent and advocate for disabled students at UBC.

In the creation of this document, we spoke with many disabled students. The overarching theme of these conversations is that, time and time again, UBC has failed in its duty to accommodate disabled members of the UBC community and its stated commitment to equity, diversity, and inclusion through accessibility. As a result, disabled students are experiencing exclusion, discrimination, and unequal access to a UBC education. We acknowledge that disabled faculty and staff are equally impacted by this ableism. We are not able to speak directly for faculty and staff, but we stand in solidarity with them and we strongly encourage the UBC administration to solicit the expertise of the UBC Disability Affinity Group and Dr. Jennifer Gagnon.

To address the disparity between disabled and non-disabled students, UBC must consider disability inclusion to be a strategic priority. It is time for the University to act, and we propose that it begin by addressing the following Calls to Action, which we have organized into eight key commitment areas:

1. Promoting Equity through Administrative Changes
2. Improving Existing Disability-Related Services
3. Increasing Representation of Openly Disabled Scholars and Staff
4. Supporting Disabled Students with Funding, Scholarships, and Research Grants Across Campuses
5. Addressing Graduate Student Needs
6. Making the Built Environment Accessible
7. Creating an Accessible Culture in Teaching and Learning
8. Ensuring Equitable Public Health Decision Making

We would like to make it clear that these Calls to Action are not frivolous recommendations. The University of British Columbia has obligations to its student body. We would consider the above Calls to Action to be necessary steps towards the full implementation of the University's Inclusion Action Plan and Policy LR7 ("Accommodation for Students with Disabilities") as well as the *BC Human Rights Code* and the new *Accessible British Columbia Act*. We stress that we hope that UBC will interpret the *Accessible British Columbia Act* and Regulations as the minimum acceptable standard and commit to embracing the proactive, accessibility-oriented spirit of the law moving forward.

Promoting Equity through Administrative Changes

In line with s. 9 of the *Accessible British Columbia Act*, UBC is required to create an "Accessibility Committee" to help UBC identify, remove, and prevent barriers that are impeding people with disabilities from fully participating in UBC life. We recognize this newly created legal obligation, but we insist that the *Accessible British Columbia Act* be viewed as the rights floor, not a rights ceiling.

Given the pressing timelines created by the *Accessible British Columbia Act*, we recognize that there has been minimal time to assemble the statutory required Accessibility Committee; however, we are disappointed with UBC's lack of consultation with disabled students and faculty between the announcement of this statutory requirement and the current day. We insist that this absence of disability involvement does not continue moving forward.

We consider this document and our associated meeting to represent a preliminary consultation with students, but we insist that the Accessibility Committee commits to a "nothing about us without us" governance approach that includes disabled participants in all stages of decision-making processes on disability-related matters (from inception to implementation, not just at the comments stage).

In the process of the Accessibility Committee executing their statutory duty to assist UBC in identifying, removing, and preventing "barriers to individuals in or interacting with the organization," and to ensure that disabled voices are brought to the forefront of this process, we request that that Accessibility Committee's first action be to create a short-term Disability Task Force. This Task Force will endeavour to unmask ableism throughout the university through research and consultation initiatives and will assemble reports to guide the Accessibility Committee's long-term vision of how accessibility will be prioritized at UBC. This Task Force's role would be to assemble a document similar to the "Indigenous Strategic Plan" to guide the actions of the University and the Accessibility Committee moving forward.

A “Disability Task Force” has been requested by the disabled community at UBC for many years and is needed to allow community members to guide the university's policies vis-a-vis people with disabilities. This Task Force must encompass the “nothing about us without us” approach.

The composition of both the Accessibility Committee and the Task Force must be at least 50% participants who identify as disabled. While the *Accessible British Columbia Act* allows for “individuals who support, or are from organizations that support, persons with disabilities” to be included in this 50%, we are opposed to any Committee or Task Force that is not made up of a majority of people with disabilities.

In addition to the demographic requirements laid out in s. 9(2) of the *Accessible British Columbia Act*, we request that Accessibility Committee and Disability Task Force’s members show a representative range of disabled and lived experiences that include:

1. Different disabilities and diverse lived experiences.
2. Multiple faculties and departments.
3. Representation of the UBC Okanagan community.
4. Representation of varied roles and positions within the UBC community, including:
 1. Undergraduate students;
 2. Graduate students;
 3. Staff; and,
 4. Faculty (including a range of lecturers, both tenure-track and non-tenure-track appointments, contract faculty, sessionals and adjuncts).

In the creation of the Accessibility Committee and Disability Task Force we also insist that UBC be attentive to equitable participation measures, by:

1. Appropriately compensate all members of the Committee and Task Force; and,
2. Protect disabled representatives from any form of retaliation.

Disabled students and staff should not be asked to donate their time to these institutional mechanisms without compensation; therefore, UBC must fully resource both the Disability Task Force and the permanent Accessibility Committee on a continuing basis. .

We would like the Task Force to undertake the following initiatives to guide the implementation of a permanent Accessibility Committee:

1. The Task Force should be tasked with overseeing the collection of data around disabled faculty, staff, and students and ensuring this data be used to appropriately guide equity initiatives. The Task Force should work with Planning and Institutional Research Office (PAIR)³ on the Student Demographic Data Project to gather data on the needs of students with disabilities.

³ <https://equity.ubc.ca/about/institutional-initiatives/student-demographic-data-project>

2. The Task Force should commission a review of the UBCV Centre for Accessibility, the UBCO Disability Resource Centre, Workplace Accommodations Policy, Centre for Workplace Accessibility, Human Resources units tasked with accommodations, and Policy LR7 “Accommodation for Students with Disabilities” to assess the degree these practices are failing to fully include students and staff with disabilities into the UBC academic community. We insist that disabled people guide this process and that the “nothing without us” governance approach is respected.
3. This Task Force should create a method for institutional accountability to address systemic issues of the exclusion of people with disabilities at UBC.
4. The Task Force should advocate for accessibility to be integrated into strategic priorities and plans such as the Campus Vision 2050 Process, the Indigenous Strategic Plan, the Inclusion Action Plan, and the President’s Academic Excellence Initiative.

UBC must publicly disclose the Task Force’s activities as well as their research initiatives in order to ensure transparency or process. The Task Force should also commit to having meetings where students and faculty may attend and give their feedback. All activities of the Accessibility Committee’s activities should likewise be public and transparent. The only exception to this transparency rule should be when anonymity is required to facilitate disabled students and staff voicing their concerns without the risk of public disclosure or reprisal.

Improving Existing Disability-Related Services

A recurring theme discussed by students with disabilities is the significant shortcomings in the currently existing disability-related services at UBC. We propose that the University make the following commitments:

1. Modify the current practices of the Centre for Accessibility and the UBCO Disability Resource Centre to respect the Inclusion Action Plan, the Anti-Racism Task Force Report, and any future recommendations made by the Task Force. As a starting point, we suggest the following changes which would improve the current experience of students with disabilities:
 - Shift from a medical model to a social model of disability approach.
 - Embrace the principles of universal design within the accommodations process.
 - Provide accessibility advisors with training on how to provide trauma-informed support. Students with disabilities are repeatedly reporting that their interactions with the CFA and DRC are so traumatic that they are dissuaded from asking for necessary accommodation.
 - Commit to fully funding and fully resourcing these Centres on an ongoing basis.

- Create mechanisms for promoting community outreach, into the community.
- Establish mechanisms for ongoing students and faculty to provide feedback and complaints, and for both Centres' accommodation process.
- Create a formal complaints process to review the Centre's decisions. At the moment, the UBC Equity & Inclusion Office is the only mechanism for redressing insufficient accommodation and discrimination, and currently does not have the capacity for disability-focussed complaints.
- Ensure that accommodation can effectively be accessed across various departments by streamlining the accommodations process and reducing the burden on students with disabilities of having to concurrently navigate multiple administrative processes.

We acknowledge that the Workplace Accommodation Policy is currently being worked on to provide staff with accommodations; however, this policy has already drawn criticism from staff. We request that UBC commit itself to appropriately consulting with staff and the Disability Affinity Group before the implementation of this policy.

We also insist that this policy be inclusive of student workers and avoid placing additional burden on students to register through both the Centre for Workplace Accessibility and Centre for Accessibility (see details below: "Addressing Graduate Student Needs").

We also want to draw attention to the fact that UBCO Disability Resource Centre has unique challenges and consultation with UBCO disabled students should be undertaken. As a starting point, the UBCO DRC currently doesn't have any unique funding accessible for students who need financial support to access accommodations. Students with Disabilities are not provided any funding avenues and it is unclear on the DRC webpage and processes, if these students qualify for UBC-Vancouver funding avenues. This should be amended to bring it into line with the UBCV CFA model which offers a separate funding pool, not linked to the operating budget for the CFA, that can be used to pay for accommodations for students with disabilities. Additionally, there should be clarification on whether these students are eligible and can access UBC-Vancouver scholarships and bursaries for students with disabilities.

2. Update Policy LR7 in accordance with recommendations made by the Task Force.
 - Commit to reviewing this policy every 5 years.
 - Ensure the Policy Review Committee has representation from the disabled community and engages in a robust community consultation process

3. Ensure that mobility aids such as the Accessibility Shuttle offers more availability and accessibility. This would require:
 - Expanding the shuttle's hour of operations. It is not acceptable that the shuttle only currently operates from 9 AM to 4:30 PM from Monday to Friday. Disabled

people - like all students - need to move around campus after these hours. These limited hours impede disabled students' full participation into campus and educational life.

- Establishing more stop locations as there are only 16 existing locations around campus.
- Provide funding to the AMS SafeWalk to allow them to expand their services to accommodate students with disabilities who require assistance after hours
- Development of an accessibility shuttle on the Okanagan campus upon consultation of stakeholders.

Increasing Representation of Openly Disabled Scholars and Staff

Students rarely, if ever, encounter openly disabled staff and faculty. This undermines disabled student excellence and brings into question the institution's commitment to diversity of thought. It undermines the ability for disabled students to succeed and imagine a career in academic settings if they do not see disabled people succeeding at the university. UBC must take the following steps in order to increase representation of openly disabled scholars and staff:

1. Meet in good faith with the Disability Affinity Group and take their suggestions on how best to support faculty and staff with disabilities at UBC. UBC should fully compensate the DAG for their consultation time and efforts.
2. Establish the following fully-funded, permanent senior advisor positions, both of which must be held by disabled people:
 - Senior Advisor to the Provost on Disability and Accessibility, and
 - Senior Advisor to the President on Disability and Accessibility (similar to the current position of Handel Wright, Senior Advisor to the President on Anti-Racism).
3. Increase hiring of disabled scholars and staff at all faculty ranks, including lecturers, non-tenure and tenure-stream faculty, and contract faculty. This includes, but is not limited to:
 - Prioritizing hiring disabled applicants for positions within the Centre for Accessibility and Centre for Workplace Accessibility, as well as across the other areas where the institution advises students with disabilities (Example: Academic Advising, Career Advising, International Student Advising, Residence Life);
 - Establishing a Postdoctoral and Doctoral Fellowship Program for Disabled Scholars, similar to the proposed Postdoctoral and Doctoral Fellowship Program for Black Scholars;

- Applying the recommendations put forth in the Canada Research Chair Equitable Research Productivity Assessments Final Report;⁴ and,
 - Apply the recommendations from the EIO-funded Professional Development for Disabled Instructors Project.
4. Commit to the retention of disabled staff members. This includes ensuring that disabled staff members receive appropriate accommodation.
 5. Support, fund, and fully resource a new Centre for Disability Studies and Activism. This should be staffed by disabled scholars and disabled studies. Scholars currently focussing on disability studies do not have a “home” in any one department at UBC, despite their work reaching multiple disciplines.
 6. Uplift disabled scholars’ voices, promote disabled scholars’ research, and create professional development opportunities aimed at disabled scholars and staff.
 7. Foster a disability-affirming cross-campus culture that promotes greater disability competence and discourages ableism so that disabled scholars and staff can openly embrace their disability status without fear of professional repercussions. This could include workshops, online modules, equitable hiring training programs similar to the Positive Space program.

Supporting Disabled Students with Funding, Scholarships, and Research Grants

As funding opportunities for disabled students are out of sync with disabled students’ needs and timelines the university must do the following to address these shortcomings:

1. Make scholarships and awards more accessible for disabled students in a way that reflects the realities that disabled students’ educational trajectories often differ from their non-disabled peers. Scholarship and awards for disabled students should allow for a greater flexibility to reflect this reality. Some modifications that we recommend include:
 - Offering bursaries that provide support beyond the standard four year timeline for students taking reduced course loads;
 - Ensuring that part-time students are eligible for disability related scholarships by relaxing the courseload requirements to access scholarships; and,
 - Providing exceptions for extenuating circumstances.

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<https://academic.ubc.ca/sites/vpa.ubc.ca/files/documents/Equitable%20Research%20Productivity%20Assessments%20-%20Final%20Report.18.10.21.pdf>

2. Eliminate the “disability tax”⁵ that disabled students pay on accessible housing and parking by:
 - Providing accessible housing to students who qualify for the same cost as the lowest cost housing unit in the residence building; and,
 - Distribute free UBC parking passes for students, staff, and faculty with government-issued disability parking permits for use at all UBC parkades.

Addressing Graduate Student Needs

Disabled graduate students at UBC are slipping through the cracks. The University must therefore take the following steps to address graduate students’ unique needs:

1. Investigate and eliminate timeline-related barriers to degree completion for disabled graduate students, including eliminating the time-consuming and patronizing “surveillance without support” extensions process.
2. Adjust funding timelines and tuition fee schedules to be commensurate with disabled students’ degree completion timelines, including:
 - Adding an additional year of funding on all multi-year UBC fellowships and awards for disabled students without a Full-Time Status with Reduced Workload accommodation, similar to York University’s approach;
 - Adding an additional semester of funding on all single-year UBC fellowships and awards for disabled students without a Full-Time Status with Reduced Workload accommodation;
 - Funding extensions in proportion with workload reduction for students who have a Full-Time Status with Reduced Workload accommodation;
 - Collaborate with the TA union (CUPE 2278) to extend priority in assigning TAships for disabled graduate students by at least one year; and,
 - Revising the tuition fee schedule for domestic students in standard doctoral degree programs, by abolishing the higher “extension” tuition fee, and expanding the “continuing” tuition fee in its place.
3. Streamline the process for accommodations by ensuring that graduate students are able to access all available supports in their varied roles as students, researchers, instructors, and workers by:
 - Integrating the accommodations process for disabled graduate students classified as both workers *and* students;

⁵ The “disability tax” refers to the increased amount of financial burden disabled people incur as a result of inaccessibly designed systems, products, and services. For example, part time students may incur additional costs as a result for paying general fees over a longer period of time.

- Creating a system of accountability to address institutional entities' pervasive failure to take responsibility for meeting graduate students' access needs;
 - Ensuring that graduate students are informed about and have access to all relevant employee supports (i.e., the Centre for Workplace Accessibility and HR's Stay at Work/Return to Work program);
 - Guaranteeing classroom *and* research accommodations through the Centre for Accessibility that align with graduate program demands (e.g., a lab assistant as a research-related accommodation);
 - Designing student, researcher, instructor, and worker supports with the unique needs of graduate students in mind;
4. Address the appearance of bias across units and protect disabled graduate students from intradepartmental politics and abuse of power by providing low- to no-barrier access to resources, accommodations, and supports at the faculty or university level.
 5. Design professional development opportunities with an eye towards disabled graduate students (and the heightened barriers that they face), including:
 - Creating a Postdoctoral Fellowship Program for Disabled Scholars (similar to the currently proposed Postdoctoral Fellowship Program for Black Scholars, envisioned by Dr. Ismaël Traoré, Director of Faculty Equity, UBCV Provost's Office, and Dr. Jenny Phelps, Assistant Vice-Provost, UBCV Graduate & Postdoctoral Studies); and
 - Supporting and resourcing mentoring opportunities for disabled graduate students.

Making the Built Environment Accessible

In order to eliminate barriers that disabled students face from the built environment at UBC, the University must prioritize accessibility in the following ways:

1. Seek to build in accessibility beyond what is mandated in building codes and construction guidelines, including:
 - Seeking to make new capital projects fully accessible;⁶
 - Improving accessibility features in existing buildings;
 - Require classroom furniture and design that is adaptable, flexible, agile, and accessible;
 - Do not just relegate 'accessible seating' to the back of the classroom; and,
 - Providing equal access in experiential learning spaces (e.g., laboratories, UBC Farm, field studies, etc.); and,

⁶ <https://www.rickhansen.com/sites/default/files/downloads/rhfac-tip-sheet.pdf>

- Provide concrete ways of how the 7 Principles of Universal Accessibility are being followed through UBC's building designs.
 - Creating more accessible housing options in all residences and housing constructed on campus by incorporating accessibility in the Housing Action Plan and Campus Vision 2050
2. The Task Force in collaboration with the Campus and Community Planning should audit the campus for accessibility on a regular basis and make the results of accessibility audits public. UBC currently does not regularly release complete information on the physical accessibility of its campus, leaving many gaps in up-to-date information. In the interest of transparency, this information should be public.
 3. Provide an accessibility guide for all learning spaces on campus so that students are able to more easily navigate physical campus space.

Creating an Accessible Culture in Teaching and Learning

The university has a human rights obligation to provide education in a format that is accessible for all students. The COVID-19 pandemic allowed us to innovate and develop creative solutions with regards to online teaching and we have seen how it is possible to implement a hybrid model for teaching. We also saw many learning disparities come to light during the COVID-19 pandemic. For disabled students, the pandemic exacerbated pre-existing disparities as well as created more flexibility to access education. It is clear there is a need to preserve online learning and work as an option available alongside in-person. Delivering on its educational mission requires that UBC make the following commitments to fostering accessible teaching and learning:

1. Create training, institutional guidance, and infrastructure for supporting recorded lectures and hybrid programming. Many students have benefitted from the increased usage of lecture recording and hybrid programming, including neurodivergent students (i.e. students with ADHD, autism, Tourettes), students with hearing disabilities, immunocompromised students, and students with disabilities that may prevent them from attending class regularly or participating in class fully., This includes:
 - Reducing barriers for instructors to set up recorded lectures by creating infrastructure and training for lecture recording; and,
 - Creating guiding documents on issues of privacy, respecting cultural settings (i.e. bringing in Indigenous guest speakers), sensitive subject matter, and the protection of intellectual property
 - Building upon existing accommodations infrastructure for audio recording
2. Create a permanent position within the Centre for Teaching, Learning and Technology for an expert on accessible teaching and learning (with priority hiring for disabled applicants).

3. Offer and incentivize training for all faculty and Teaching Assistants on accessible approaches to instruction in order to support UBC's commitment to teaching and research excellence at UBC. These trainings should include instruction about universal design.
4. Integrate accessibility and universal design into the Centre for Teaching, Learning and Technology Instructional Skills Workshop for Teaching Assistants.
5. Support disabled instructors by applying the recommendations from the EIO-funded Professional Development for Disabled Instructors Project.
6. Incorporate disability rights and disability justice into the curriculum across all disciplines (see the Centre for Disability Studies and Activism recommendation).
7. Provide professional development and staff education around:
 - Interpersonal ableism and discrimination;
 - Universal Design for Learning including creating a differentiation of the concept of “no barrier” and “low barrier” forms of inclusion; and,
 - Ensuring that the emotional labour of providing these education courses is not left to current UBC staff. UBC should hire professionals and fund these staffing programs appropriately.
8. Fully resource peer-led mentorship programs for disabled students. Mentorship programs have already been created by both DUC and ULDA and these programs should both receive funding from UBC.
9. Create additional supports for students to participate in labs and experiential learning opportunities. Labs are often highly inaccessible for students with disabilities. Insufficient accommodations mean students with disabilities are either endangered or unable to actively participate and learn from lab activities. A lab assistant completing the tasks while a student “directs” and watches is not contributing to a student's learning. UBC should address the learning needs of students engaged in lab-based courses by:
 - Ensuring labs are designed accessibly to support the use of mobility devices
 - Providing alternative lab times for disabled students to complete lab work in a less stressful environment and space for students to perform lab tasks;
 - Providing a standing wheelchair available for use by disabled students
 - Giving disabled students the option to be exempt from the lab; and,
 - Eliminating lab fees for students who are unable to actively participate.

Ensuring Equitable Public Health Decision Making

As the COVID-19 pandemic has demonstrated, the outcomes of UBC's public health decisions disproportionately impact disabled students, faculty, and staff. Currently, decisions are made without proactively seeking out students with disabilities. Decisions must therefore account for and communicate these uneven risks in the following ways:

1. All public health decisions, policies, and statements made by UBC must include:
 - A description of whether and how such decisions will impact disabled students, faculty, and staff; and,
 - An explanation of what steps UBC is taking to proactively mitigate any increased risk to disabled students, faculty, and staff.
 - Consultation with representatives from campus organizations representing disabled staff, students, and faculty.