

Policy Report

TO: The University Community

DATE: September 1, 2026

PRESENTED BY: Yonae Kelly, Manager – Student Accessibility Services

SUBJECT: Opportunity to Comment:
Procedure for the Use of Service Animals on Campus

OPPORTUNITY TO COMMENT:

Community members are invited to provide comments on the proposed amendments to the Procedure for the Use of Service Animals on Campus. Comments may be submitted using the [Policy Feedback Form](#) on the university's website. Comments will be accepted until September 15, 2026 at 3:00 pm.

BACKGROUND/CONTEXT & RATIONALE:

The Procedure for the Use of Service Animals on Campus has undergone a comprehensive review to ensure alignment with current legislative requirements, institutional accessibility practices, and the University's obligations under the Accessibility for Ontarians with Disabilities Act (AODA) and the Ontario Human Rights Code.

The review was initiated to modernize the existing Procedure, address operational gaps identified through the administration of Service Animal accommodations, and improve clarity for students, employees, visitors, and University partners. Recent amendments to the AODA Customer Service Standard also provided an opportunity to strengthen alignment with current legislation and best practices.

The revised Procedure supports the University's commitment to providing an accessible, inclusive, and equitable learning and working environment while balancing accessibility, health and safety, and operational requirements.

What's Changed:

The proposed amendments:

- Align the Procedure with current AODA Customer Service Standards and the Ontario Human Rights Code;
- Clarify the respective roles of Student Accessibility Services and Human Resources in administering Service Animal accommodations;
- Strengthen language regarding individualized accommodation assessments;
- Clarify documentation requirements and accommodation review processes;
- Provide guidance for competing accommodation needs and high-risk environments;
- Clarify responsibilities of Handlers, University Members and operational departments;
- Clarify processes for visitors, specialized learning environments, and high-risk areas;
- Improve readability and consistency throughout the Procedure.

OVERVIEW:

The Procedure for the Use of Service Animals on Campus has been revised to align with the Accessibility for Ontarians with Disabilities Act (AODA), the Ontario Human Rights Code, and current institutional practices. The revisions clarify roles and responsibilities, strengthen guidance related to individualized accommodation assessments, documentation requirements, and Service Animal access, while improving consistency across Student Accessibility Services, Human Resources, and other University partners. The review also provided an opportunity to modernize the Procedure, ensuring it reflects current accommodation practices and supports a clear, consistent, and transparent approach to Service Animal accommodations across the University.

COMPLIANCE WITH POLICY/LEGISLATION:

The revised Procedure aligns with:

- Accessibility for Ontarians with Disabilities Act (AODA)
- Integrated Accessibility Standards Regulation
- Ontario Human Rights Code
- Ontario Tech University's Accessibility Policy

CONSULTATION AND NEXT STEPS:

The revised Procedure has undergone consultation with:

- Policy Advisory Committee (Policy Assessment)
- Deputy Provost
- Legal Counsel
- Human Resources

- Office of Human Rights, Equity, Diversity and Inclusion
- Office of Risk Management
- Student Accessibility Services
- Research Ethics Services
- Animal Care Committee

Following incorporation of feedback received through the Policy Advisory Committee, Legal Counsel, Human Resources, Research Ethics Services, and the Animal Care Committee, the revised Procedure will proceed through the University's formal consultation and approval process, including:

- Online Consultation (Written Consultation)
- Academic Council (Face to Face Consultation)
- Senior Leadership Team (Deliberation)
- Audit & Finance Committee (Approval)

SUPPORTING REFERENCE MATERIALS:

- Appendix 1: Draft Procedure for the Use of Service/Emotional Support Animals on Campus
- Accessibility Policy
- Accessibility for Ontarians with Disabilities Act (AODA)
- Ontario Human Rights Code



Classification <u>Number</u>	LCG 1103.02
Parent Policy	Accessibility policy Policy
Framework Category	Legal, Compliance and Governance
Approving Authority	Audit and Finance Committee
Policy Owner	Deputy Provost
Approval Date	November 20, 2019 DRAFT FOR REVIEW
Review Date	November 20, 2022 September 2020
Last Updated	November 20, 2019 ; Editorial Amendment, October 14, 2025 Editorial Amendments, February 18, 2020
Supersedes	September 5, 2017



PROCEDURE FOR THE USE OF ~~A~~ SERVICE ANIMAL ~~BY STUDENTS WITH DISABILITIES~~ ANIMALS ON CAMPUS

PURPOSE

1. The purpose of this procedure is to set out conditions for the use of Service Animals on ~~the University of Ontario Institute of Technology (Ontario Tech) property owned or leased~~ ("University property") Campus, to identify their presence, and to ensure the ongoing safety of all ~~members of the campus community~~ University Members. This ~~procedure~~ Procedure was developed under the scope of the Accessibility for ~~Ontarian's~~ Ontarians with Disabilities Act ~~(and associated regulations ("AODA"))~~ and the Ontario Human Rights Code in a manner consistent with the Accessibility Policy and its commitment to creating a campus community that is inclusive of all individuals.

DEFINITIONS

2. For the purposes of these Procedures the following definitions apply:

~~"Authority"~~ means the University office responsible for receiving, reviewing and administering requests for Service Animal ~~"means an animal that is required for accommodations."~~

~~"Campus"~~ means all property owned, leased or operated by Ontario Tech University, including the North Oshawa campus location, Downtown Oshawa campus location, residence buildings and any other University-owned or leased facilities.

~~"Employee"~~ means an individual performing services on behalf of the University, including administrative staff members, faculty, contract employees, volunteers and job applicants. Students employed by the University are considered employees for the purposes of these Procedures only while engaged in employment-related activities.

“Handler” means a person with a disability ~~that is either:~~

- ~~a) Readily identified as one that is being used by the person for reasons relating to the person’s disability, as a result of visual indicators such as the vest or harness worn by the animal; or~~
- ~~b) Requires the person with a disability to provide documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:~~
 - ~~• A member of the College of Audiologists and Speech-Language Pathologists of Ontario.~~
 - ~~• A member of the College of Chiropractors of Ontario.~~
 - ~~• A member of the College of Nurses of Ontario.~~
 - ~~• A member of the College of Occupational Therapists of Ontario.~~
 - ~~• A member of the College of Optometrists of Ontario.~~
 - ~~• A member of the College of Physicians and Surgeons of Ontario.~~
 - ~~• A member of the College of Physiotherapists of Ontario.~~
 - ~~• A member of the College of Psychologists of Ontario.~~
 - ~~• A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario. O. Reg. 165/16, s. 16.~~

~~The disability can be visible or invisible. The Service Animal is readily identifiable with visual indicators such as a vest or harness. Please refer to section 10.1 for further clarification and definition of the functions of a Service Animal.~~

“Handler” means an individual who, as a result of a disability, requires the assistance of a Service Animal and has charge of the Service Animal ~~is responsible for the care, supervision and control of the animal while on Campus.~~

“Emotional Support Animal” means an animal that maybe used as part of a medical treatment plan, but has no specialized training or function with respect to fulfilling a person’s disability related needs. The University is not required to provide accommodations for Emotional Support Animals as it is for Service Animals.

“Authority” means the functional area that is responsible for validating documentation, approving, registering and managing the use of Service Animals on University Property by University Members and visitors.

“High-Risk Area” means a location where legislative, regulatory; health or safety requirements may limit or prohibit the presence of animals. Examples include, but are not limited to, food preparation areas, wet laboratories, research laboratories containing hazardous materials, or other specialized environments identified through a risk assessment.

“Requester” means an individual requesting the ongoing use of a Service Animal on Campus.

“Service Animal” has the meaning set out in the AODA and its regulations.

“University Member” means any individual who ~~is:~~ —;

- ~~• Employed by the University~~
 - ~~• Registered is an Employee;~~

- ~~is registered~~ as a student, in accordance with the University's academic regulations ~~of the University; ("Student")~~;
- ~~Holding an~~ holds a paid, unpaid or honorary appointment with the University, ~~including paid, unpaid and/or honorific appointments; and/; or~~
- ~~Otherwise is~~ otherwise subject to University policies ~~by virtue of through~~ the requirements of a ~~specific policy (e.g. Booking and Use of University Space) and/or the terms of a policy,~~ agreement or contract.

SCOPE AND AUTHORITY

~~3. These Procedures apply to Service Animals on University property.~~

~~3.~~ These Procedures apply to all University Members ~~or,~~ visitors and Service Animals on Campus.

~~1.4.~~ Students living in residence may be held to additional requirements as articulated in the Residence Community Living Standards.

~~2.~~ Visitors attending University property with a Service Animal are governed by the University's Accessible Customer Service Policy. While on Campus, visitors are expected to comply with the applicable health and safety requirements and operational expectations outlined in these Procedures.

~~4.5.~~ University property.

~~5.6.~~ The Deputy Provost, or successor thereof, is the Policy Owner and is responsible for overseeing the implementation, administration and interpretation of these Procedures.

~~6. Student Accessibility Services (SAS) is the Authority responsible for administering the procedures for students who require Service Animals on University property.~~

~~7. Human Resources (HR) is the Authority responsible for administering the procedures for employees or those holding appointments with the University who require Service Animals on University property.~~

PROCEDURES

~~8. In order to provide an accessible learning and working environment, the University is committed to the development and implementation of procedures that enable the University community to understand and support the Handler and their Service Animal while on campus. It is also important that both the Handler and University Members understand their rights and responsibilities in this regard.~~

~~9. Where Service Animals are not permitted on or in a particular campus location or building due to health and safety laws or requirements, the University will provide alternate support to~~

permit access to goods and services, or provide reasonable accommodation for the University Member.

10. Distinction between Service Animals and Emotional Support Animals:

10.1.—Service Animals are animals that are:

- a)**—Readily identified as a Service Animal that is being used by the person for reasons relating to the person's disability through the use of visual indicators such as a vest or harness worn by the animal; and
- b)**—Specifically trained to perform tasks for a person with a disability such as, but not limited to:
 - Guiding people who are blind or visually impaired;
 - Alerting people who are deaf or hearing impaired;
 - Pulling wheelchairs for those with limited mobility;
 - Alerting and protecting a person who is having a seizure;
 - Performing other specialized tasks (diabetic, medical, severe allergy alert);
 - Reminding a person to take their medication;
 - Providing comfort and reducing symptoms related to a person's disability in certain situations

11. Service Animals are working animals.

12. In instances where an Emotional Support Animal, meets the criteria for Service Animal as described in section 10.1, the University will strive to provide accommodation for the animal on University property.

13. Process for Service Animal Approval and Notification

13.1.—Any University Member having a Service Animal on University property should be directed to the appropriate Authority.

13.2.—In order to bring a Service Animal on University Property on an ongoing basis, the University Member is required to submit satisfactory supporting documentation to the appropriate Authority demonstrating their requirement for a Service Animal to assist with their disability-related needs.

7. University members requiring the use Making a Request

7.1. Accommodation requests will be submitted to the applicable Authority and will include appropriate documentation as described in section 10 and required by the University's accommodation procedures.

- a)** Student Accessibility Services (SAS) is the Authority for Students and will process requests in accordance with the accommodation procedures for Students.

b) Human Resources (HR) is the Authority for Employees and will process requests in accordance with the accommodation procedures for Employees

7.2. Requests should be submitted as early as reasonably possible to allow sufficient time for review, consultation, and implementation of appropriate accommodations.

8. Individualized Assessment Process

8.1. The Authority will assess the request on an individualized basis, taking into consideration:

- a) the individual's disability-related needs;
- b) the essential requirements of the academic, employment or campus environment;
- c) applicable health and safety requirements;
- d) High Risk Areas that may be a part of a Service Animal will need to register with the Requester's academic or employment requirements.
- e) competing accommodation needs where applicable; and
- f) the University's duty to accommodate under the Ontario Human Rights Code.

8.2. The Authority may consult with relevant University departments, academic units, health and safety personnel, or other stakeholders as necessary to determine appropriate Authority and update any documentation that has an expiry date. They will not need to obtain new documentation year over year unless their accommodations, support measures, and health and safety requirements.

13.3.8.3. Once approved, registration will remain valid until: i) the Handler's disability related needs change and; ii) an alternative means of support is required; iii) and/or where the animal who provides services changes such that their record with the appropriate Authority no longer matches.

High Risk Areas

8.4. Requests involving the use of Service Animals in High-Risk Areas will be assessed by the Authority on a case-by-case basis in consultation with the Office of Risk Management, the applicable academic unit, any external partners and subject matter experts as appropriate.

8.5. Access may be limited where legislative requirements, health and safety considerations or the essential requirements of an academic or workplace environment cannot be reasonably accommodated.

- a) Examples of High-Risk Areas include, but are not limited to, food preparation areas, clinical placements, laboratories, and other specialized environments.

8.6. Handlers who have permission to bring their Service Animal into a High-Risk Area are responsible for the health and safety of the Service Animal, including the procurement of any protective equipment that the Service Animal may require.

8.7. Approval to use a Service Animal on University property may not provide unrestricted access to all Campus spaces. Where restrictions are necessary, the University will work collaboratively with the individual to identify reasonable alternative accommodations.

9. Process for Notification

~~13.4.~~ The Authority will validate the submitted documentation and make reasonable efforts to may notify relevant University Members ~~who may be affected by~~ of the presence of a Service Animal ~~before approval.~~

9.1. The University understands that ~~where~~ the presence of ~~certain~~ Service Animals may ~~affect other University Members due~~ give rise to competing accommodation requirements arising from environmental sensitivities, allergies, phobias or other concerns. ~~For this reason, the Handler will be requested to consent to having of individuals who~~

~~13.5.9.2.~~ Notifications will ~~work with or attend class with a Service Animal notified of their presence, and such consent shall not to be unreasonably withheld. This notification be limited to the information necessary to support accommodation implementation and will not contain any~~ disclose confidential information ~~about regarding the nature of the Handler's~~ Handler's disability. Notifications will include information directing questions or concerns to the appropriate Authority rather than the Handler.

10. Process to Address University Member Concerns about

10.1. University Members with concerns related to the ~~effect~~ presence of a Service Animal ~~on a University Member must be directed to (for example, allergies, environmental sensitivities or phobias) may contact the Authority for resolution, not the Handler directly.~~

~~13.6.10.2.~~ The Authority will assess the impact on the University Member on a case-by-case basis and consider the following principles and obligations when balancing the conflicting interests:

- a) The legal obligation permitting the use of Service Animals under the AODA;
- b) The duty to accommodate under the Ontario Human Rights Code (~~OHRC~~); and
- c) The approach outlined in OHRC's Ontario Human Rights Commission's Policy on Competing Human Rights as applied to all parties.

~~13.7.10.3.~~ The means for resolving concerns may include creating distance between the Service Animal and the individual with a concern, changes in scheduling or altered cleaning regimens due to the presence of a Service Animal, or other such accommodations ~~as may be~~ appropriate to the circumstances.-

14.11. Supporting Documentation

14.1.—Supporting medical documentation ~~for a Service Animal must meet all of the following requirements:~~

~~a)~~ Ontario Tech's Service Animal Recommendation form ~~must~~will be completed by ~~one of the following practitioners: physician, occupational therapist, ophthalmologist, audiologist, psychologist, or psychiatrist.~~

11.1. an appropriate regulated health professional authorized to provide disability-related documentation in accordance with applicable legislation and University requirements. Documentation ~~must be dated and will~~ include:

a) A description of the disability-related need for the Service Animal and explain how the animal assists the individual in accessing the University's learning, working or living environment.

b) The date documentation was completed.

~~b)c)~~ The practitioner's credentials, contact information and signature.

~~c)~~ The practitioner must provide a detailed explanation of the need for the Service Animal as it relates specifically to the functional impairment caused by University Member's disability, and indicate the specific tasks or functions that the Service Animal performs.

~~d)~~**11.2.** DocumentationThe Requester must also provide documentation showing that the Service Animal has been vaccinated and is properly licensed as required by Ontario law and/or city by-law. In addition to any Ontario law or city by-law requirements, Dogs, cats and ferrets also require rabies vaccinations.

~~a)~~ Additional documents ~~maybe~~ requested in instances where the Authority has reasonable doubt regarding the Service Animals capacity to be in public spaces

15. Service Animal Behaviour

16. For University Members who have a concern about the effect of a Service Animal on a University Member, the supporting documentation, supporting documentation will be requested as deemed necessary.

16.1.—The Handler is responsible at all times for all aspects of behaviour and management of the Service Animal on all University property including:

~~e)~~ Any cleaning as well as any costs associated with cleaning that may result from the Service Animal.

~~f)~~ Ensuring that any feces is cleaned up immediately and disposed of in an appropriate receptacle.

~~g)~~ The Service Animal must demonstrate positive and pro-social behaviour at all times while on University property.

17. Care of Service Animals

17.1.—The Handler is responsible for the following:

- ~~h)~~ Maintaining the crate or cage of the Service Animal, if it is to be crated or caged. The crate/cage must be the appropriate size, secure, in good repair and well ventilated. The health and welfare of the Service Animal and for providing food, water, bathroom and exercise breaks in a timely manner
- ~~i)~~ Keeping the Service Animal clean and groomed at all times.
- ~~j)~~ Cleaning up and disposing of any animal waste in a timely manner.

18. Animals on Campus

18.1.—Service Animals will:

- ~~a)~~ Be accompanied by the Handler at all times
- ~~b)~~ Remain in close proximity to the Handler, and restrained on a leash, in a cage, or under the physical control of the Handler; unless being unrestrained is necessary to perform their tasks or functions.
- ~~c)~~ Registered with Campus ID and their identification number will link them to the banner number of their handler. The following nomenclature will be used:
“SAXXXXXXXXXX.”

18.2.—If at any time any Animal becomes aggressive or is deemed by the appropriate Authority to pose an unmanageable threat to the health and safety of University Members or visitors, the Authority will require the Handler to remove the Animal from University property or impose conditions on the Animal's continued presence.

18.3.—There are some University locations where Animals are prohibited by law (i.e., food service preparation spaces, wet labs). These spaces will be navigated on a case-by-case basis in discussion with lab coordinators, supervisors and the appropriate Authority.

18.4.—There are some extensions of the learning environment where it may not be possible to allow a Service Animal such as clinical placements in a health care setting. These situations will be navigated on case-by-case basis in discussion with placement supervisors and the appropriate Authority.

11.3. Supporting documentation must be submitted using the University's approved documentation process or forms, as determined by the applicable Authority.

11.4. The Authority reserves the right to verify documentation where there is reason to question its authenticity or completeness. Any verification will be conducted in a manner that respects the privacy and dignity of the individual requesting

accommodation. Where the individual has not provided the documentation reasonably required to support the accommodation request, the Authority may request additional information or clarification related to the disability-related need, the functions performed by the Service Animal, or other relevant considerations.

19.12. Responsibilities

12.1. All University Members will:

- a) Respect approved Service Animal accommodations.
- b) Refrain from distracting, feeding, petting or otherwise interfering with a Service Animal without the Handler's permission.
- c) Respect the working role of Service Animals.
- d) Raise questions or concerns regarding Service Animals with the appropriate Authority rather than the Handler.
- e) Contribute to an accessible, respectful and inclusive learning and working environment.

12.2. The Authority will:

- a) Maintain documentation and accommodation records relating to approved Service Animal requests.
- b) Review supporting documentation and conduct individualized accommodation assessments in accordance with applicable legislation and University procedures.
- c) Consult with Environmental Health and Safety/Office of Risk Management and other applicable departments in the event of a health and safety concern to assess the risk and identify mitigations before developing an individual accommodation plan.
- d) Provide consultation and guidance to supervisors, managers, directors and Faculty administrators are faculty members, Human Resources, the Office of Campus Safety and other University stakeholders regarding the implementation of approved accommodations.
- e) Determine appropriate accommodation measures and coordinate implementation of approved Service Animal accommodations.
- f) Coordinate appropriate notification where necessary to facilitate accommodation or manage competing accommodation needs while protecting personal privacy.
- g) Respond to concerns, accommodation issues and competing accommodation needs related to Service Animals.
- h) Protect the confidentiality of personal information collected during the accommodation process in accordance with applicable privacy legislation and University policy.

- i) Review accommodations periodically or where circumstances materially change to ensure the accommodation continues to meet the Handler's disability-related needs.

12.3. Student Accessibility Services is the designated Authority for Students with Service Animal requests.

12.4. Human Resources is the designated Authority for Employees with Service Animal requests.

19.1.12.5. The Handler will be responsible for the enforcement of this procedure and compliance within their work units behavior, management and care of their Service Animal at all times. The Handler will:

- a) Keep the Service Animal is restrained on a leash, in a crate , or under the physical control of the Handler (unless being unrestrained is necessary to perform their tasks or functions).
- b) Accompany the Service Animal at all times and ensure that it remains in close proximity to the Handler.
- c) Maintain the Service Animal's crate or cage (if it is to be crated or caged) to ensure it is the appropriate size, secure, in good repair and well ventilated.
- d) Maintain the health and welfare of the Service Animal is maintained and food, water, bathroom and exercise breaks are provided in a timely manner.
- e) Keep the Service Animal clean and groomed at all times. Clean up and dispose of any animal waste in a timely manner. Handlers who are not physically able to pick up and dispose of waste are responsible for making all necessary arrangements for assistance;
- f) Ensuring the Service Animal maintains up-to-date vaccinations as required, and to provide proof of vaccination records if requested by the Authority.
- g) Ensure that the Service Animal demonstrates positive and pro-social behaviour at all times while on Campus. Although formal training is not a legislative requirement, it is in the best interests of the Handler to ensure that their Service Animal has been trained by a reputable organization where appropriate for the species. The Campus environment has many opportunities for unique situations for Handlers and their Service Animals to encounter. Training can teach the animal how to respond to various situations on Campus that can give rise to problematic behaviour which can be very distressing for their Handlers.

12.6. Instructors/Faculty will

- a) Provide an inclusive environment for those being accompanied by Service Animals.
- b) Refrain from providing assistance or otherwise interfering with the Service Animal unless expressly requested by the Handler.

c) In the event of a health and safety concern, in consultation with Student Accessibility Services or the Office of Human Rights, may direct a Handler to control or temporarily remove their animal from the classroom. When there is a question as to whether a Service Animal is allowed in a specific space, the Authority will assess on a case-by-case basis in accordance with the process for High Risk Areas.

19.2.d) Support implementation of approved accommodations and identifying concerns requiring further review. Faculty members are responsible for the enforcement of this procedure in their classrooms and laboratories. For students with disabilities, faculty members will consult with SAS if a student is non-compliant with this policy. SAS will determine if the student is permitted to use or continue to use a Service Animal on campus.

19.3. Campus Security is responsible for the enforcement of this procedure on all University property and will assist managers, directors and faculty members with the enforcement of this procedure as necessary.

19.4. Human Resources and Student Accessibility Services are the Authority for employees and students respectively. The Authority is responsible for:

12.7. Maintaining documentation authorizing Office of Risk Management

- a) Supports risk assessments for High-Risk Areas.
- b) Consults with SAS, HR and relevant academic or operational units.
- c) Develops recommendations to mitigate identified risks.
- d) Provides guidance regarding legislative or operational restrictions.

12.8. Office of Campus Safety

- a) Responds to immediate safety concerns involving Service Animals.
- b) Providing notificationAssists with addressing disruptive or threatening behaviour where necessary.
- c) Documents and communicates incidents to the appropriate Authority.
- d) Supports implementation of safety measures identified through the accommodation process.

12.9. University Members whoSupervisors, Managers, Directors, and Faculty Administrators

- a) Support implementation of approved accommodations within their work units.
- b) Collaborate with SAS or HR regarding accommodation planning.
- c) Participate in risk assessments where appropriate.
- d) Address operational issues in consultation with the appropriate Authority.

13. Circumstances Where Access May Be Restricted

- ~~b)~~ **13.1.** In most circumstances, approved Service Animals will be permitted on Campus. An individualized assessment to consider restrictions may be impacted by required where: i) municipal, provincial or federal legislation prohibits the presence of certain animal species; and/or ii) where the presence of a Service Animal poses a demonstrable health or safety risk that cannot be reasonably mitigated;
- ~~c)~~ Advising supervisors, managers, directors, Faculty administrators, faculty members and Campus Security and assisting them in ensuring compliance with and enforcement of this procedure.
- ~~d)~~ Approving the use of Service Animals on University property by means of validating documentation and processing accommodation request.
- ~~e)~~ Assessing and resolving any complaints or issues related to the use of Service Animals on University property.
- 13.2.** Where a Service Animal is repeatedly disruptive, aggressive, or otherwise poses a significant risk to the learning, working or living environment, the appropriate Authority will work with the Handler to address the concerns. If the concerns cannot be reasonably resolved, the University may impose conditions on the Service Animal's continued presence or require that it be removed from Campus.
- 13.3.** A decision to limit or restrict access will not be based on assumptions, stereotypes or generalized concerns about Service Animals. All decisions will be based on objective evidence, the specific circumstances of the request, and the University's obligations under the Ontario Human Rights Code and applicable legislation.

14. Review of Decisions

- 14.1.** Individuals who disagree with a decision regarding a Service Animal accommodation may request a review through the applicable accommodation process administered by Student Accessibility Services or Human Resources, as appropriate.

20.15. Protection of Privacy

- ~~20.1.15.1.~~ **20.15.1.** The University is committed to protecting the privacy of all University Members, including students with disabilities. At the same time, the University needs sufficient information to reasonably evaluate and respond to a student's request for accommodation. For this reason, students are required to provide to Student Accessibility Services information concerning the nature of their disability-related needs. Students requiring accommodations, in accordance with commitments in its Procedures to accommodate Employees and Students.

20.2. At times the accommodation process may require that a student disclose such information to staff and faculty outside of Student Accessibility Services on the basis that they "need to know" this information to perform their duties under the policies and procedures at the University. All personal

~~information disclosed to such staff or faculty will be governed by the University's Access to Information and Protection of Privacy Policy.~~

MONITORING AND REVIEW

16. These Procedures will be reviewed as necessary and at least every three years. The Deputy Provost-, or successor thereof, is responsible to monitor and review these Procedures.

~~**21.**~~

RELEVANT LEGISLATION

~~**22.**~~**17.** Ontario Human Rights Code, R.S.O. 1990, Chapter H.19

Ontario Human Rights Commission Policy on Guidelines on accessible education (2004)

Freedom of Information and Protection of Privacy Act, R.S.O. 1990

Ontario Occupational Health and Safety Act, R.S.O. 1990, Chapter O.1.

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005

Integrated Accessibility Standards Regulation, O. Reg. 191/11

RELATED POLICIES, PROCEDURES & DOCUMENTS

~~**23.**~~**18.** Accessibility Policy

[Accommodation Policy](#)

[Respectful Campus Policy](#)

[Accessible Customer Service Policy](#)

Procedures for Academic Accommodation for Students with Disabilities

[Procedures for Accommodating Employees and Job Applicants with Disabilities](#)

Academic Regulations, Undergraduate Academic Calendar

Policy on the Care and Use of Animals in Research and Teaching

Booking and Use of University Space Policy

Booking and Use of University Space Procedure

Service Animal Request Form

Classification Number	LCG 1103.02
Parent Policy	Accessibility Policy
Framework Category	Legal, Compliance and Governance
Approving Authority	Audit & Finance Committee
Policy Owner	Deputy Provost
Approval Date	DRAFT FOR REVIEW
Review Date	September 2020
Last Updated	November 20, 2019; Editorial Amendment, October 14, 2025

PROCEDURE FOR THE USE OF SERVICE ANIMALS ON CAMPUS

PURPOSE

1. The purpose of this procedure is to set out conditions for the use of Service Animals on Campus, to identify their presence, and to ensure the ongoing safety of all University Members. This Procedure was developed under the scope of the Accessibility for Ontarians with Disabilities Act and associated regulations (“AODA”) and the Ontario Human Rights Code in a manner consistent with the Accessibility Policy and its commitment to creating a campus community that is inclusive of all individuals.

DEFINITIONS

2. For the purposes of these Procedures the following definitions apply:

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“Employee” means an individual performing services on behalf of the University, including administrative staff members, faculty, contract employees, volunteers and job applicants. Students employed by the University are considered employees for the purposes of these Procedures only while engaged in employment-related activities.

“Handler” means a **person** with a disability who requires the assistance of a Service Animal and is responsible for the care, supervision and control of the animal while on Campus.

“High-Risk Area” means a location where legislative, regulatory; health or safety requirements may limit or prohibit the presence of animals. Examples include, but are not limited to, food preparation areas, wet laboratories, research laboratories containing hazardous materials, or other specialized environments identified through a risk assessment.

“Requester” means an individual requesting the ongoing use of a Service Animal on Campus.

“Service Animal” has the meaning set out in the AODA and its regulations.

“University Member” means any individual who:

- is an Employee;

- is registered as a student in accordance with the University's academic regulations ("Student");
- holds a paid, unpaid or honorary appointment with the University; or
- is otherwise subject to University policies through the requirements of a University policy, agreement or contract.

SCOPE AND AUTHORITY

3. These Procedures apply to all University Members, visitors and Service Animals on Campus.
4. Students living in residence may be held to additional requirements as articulated in the Residence Community Living Standards.
5. Visitors attending University property with a Service Animal are governed by the University's Accessible Customer Service Policy. While on Campus, visitors are expected to comply with the applicable health and safety requirements and operational expectations outlined in these Procedures.
6. The Deputy Provost, or successor thereof, is the Policy Owner and is responsible for overseeing the implementation, administration and interpretation of these Procedures.

PROCEDURES

7. Making a Request

- 7.1. Accommodation requests will be submitted to the applicable Authority and will include appropriate documentation as described in section 10 and required by the University's accommodation procedures.
 - a) Student Accessibility Services (SAS) is the Authority for Students and will process requests in accordance with the accommodation procedures for Students.
 - b) Human Resources (HR) is the Authority for Employees and will process requests in accordance with the accommodation procedures for Employees
- 7.2. Requests should be submitted as early as reasonably possible to allow sufficient time for review, consultation, and implementation of appropriate accommodations.

8. Individualized Assessment Process

- 8.1. The Authority will assess the request on an individualized basis, taking into consideration:
 - a) the individual's disability-related needs;
 - b) the essential requirements of the academic, employment or campus environment;
 - c) applicable health and safety requirements;

- d) High Risk Areas that may be a part of Requester's academic or employment requirements.
 - e) competing accommodation needs where applicable; and
 - f) the University's duty to accommodate under the Ontario Human Rights Code.
- 8.2. The Authority may consult with relevant University departments, academic units, health and safety personnel, or other stakeholders as necessary to determine appropriate accommodations, support measures, and health and safety requirements.
- 8.3. Once approved, registration will remain valid until: i) the Handler's disability related needs change; ii) an alternative means of support is required; iii) and/or the animal who provides services changes such that their record with the appropriate Authority no longer matches.

High Risk Areas

- 8.4. Requests involving the use of Service Animals in High-Risk Areas will be assessed by the Authority on a case-by-case basis in consultation with the Office of Risk Management, the applicable academic unit, any external partners and subject matter experts as appropriate.
- 8.5. Access may be limited where legislative requirements, health and safety considerations or the essential requirements of an academic or workplace environment cannot be reasonably accommodated.
 - a) Examples of High-Risk Areas include, but are not limited to, food preparation areas, clinical placements, laboratories, and other specialized environments.
- 8.6. Handlers who have permission to bring their Service Animal into a High-Risk Area are responsible for the health and safety of the Service Animal, including the procurement of any protective equipment that the Service Animal may require.
- 8.7. Approval to use a Service Animal on University property may not provide unrestricted access to all Campus spaces. Where restrictions are necessary, the University will work collaboratively with the individual to identify reasonable alternative accommodations.

9. Process for Notification

- 9.1. The Authority may notify relevant University Members of the presence of a Service Animal where the presence of a Service Animal may give rise to competing accommodation requirements arising from environmental sensitivities, allergies, phobias or other concerns.
- 9.2. Notifications will be limited to the information necessary to support accommodation implementation and will not disclose confidential information regarding the Handler's disability. Notifications will include information directing questions or concerns to the appropriate Authority rather than the Handler.

10. Process to Address University Member Concerns

- 10.1.** University Members with concerns related to the presence of a Service Animal (for example, allergies, environmental sensitivities or phobias) may contact the Authority.
- 10.2.** The Authority will assess the impact on the University Member on a case-by-case basis and consider the following principles and obligations when balancing the conflicting interests:
 - a)** The legal obligation permitting the use of Service Animals under the AODA.
 - b)** The duty to accommodate under the Ontario Human Rights Code; and
 - c)** The approach outlined in Ontario Human Rights Commission's Policy on Competing Human Rights as applied to all parties.
- 10.3.** The means for resolving concerns may include creating distance between the Service Animal and the individual with a concern, changes in scheduling or altered cleaning regimens due to the presence of a Service Animal, or other such accommodations appropriate to the circumstances.

11. Supporting Documentation

- 11.1.** Supporting medical documentation will be completed by an appropriate regulated health professional authorized to provide disability-related documentation in accordance with applicable legislation and University requirements. Documentation will include:
 - a)** A description of the disability-related need for the Service Animal and explain how the animal assists the individual in accessing the University's learning, working or living environment.
 - b)** The date documentation was completed.
 - c)** The practitioner's credentials, contact information and signature.
- 11.2.** The Requester must also provide documentation showing that the Service Animal has been vaccinated and is properly licensed as required by Ontario law and/or city by-law. In addition to any Ontario law or city by-law requirements, Dogs, cats and ferrets also require rabies vaccinations.
- 11.3.** Supporting documentation must be submitted using the University's approved documentation process or forms, as determined by the applicable Authority.
- 11.4.** The Authority reserves the right to verify documentation where there is reason to question its authenticity or completeness. Any verification will be conducted in a manner that respects the privacy and dignity of the individual requesting accommodation. Where the individual has not provided the documentation reasonably required to support the accommodation request, the Authority may request additional information or clarification related to the disability-related need, the functions performed by the Service Animal, or other relevant considerations.

12. Responsibilities

12.1. All University Members will:

- a)** Respect approved Service Animal accommodations.
- b)** Refrain from distracting, feeding, petting or otherwise interfering with a Service Animal without the Handler's permission.
- c)** Respect the working role of Service Animals.
- d)** Raise questions or concerns regarding Service Animals with the appropriate Authority rather than the Handler.
- e)** Contribute to an accessible, respectful and inclusive learning and working environment.

12.2. The Authority will:

- a)** Maintain documentation and accommodation records relating to approved Service Animal requests.
- b)** Review supporting documentation and conduct individualized accommodation assessments in accordance with applicable legislation and University procedures.
- c)** Consult with Environmental Health and Safety/Office of Risk Management and other applicable departments in the event of a health and safety concern to assess the risk and identify mitigations before developing an individual accommodation plan.
- d)** Provide consultation and guidance to supervisors, managers, faculty members, Human Resources, the Office of Campus Safety and other University stakeholders regarding the implementation of approved accommodations.
- e)** Determine appropriate accommodation measures and coordinate implementation of approved Service Animal accommodations.
- f)** Coordinate appropriate notification where necessary to facilitate accommodation or manage competing accommodation needs while protecting personal privacy.
- g)** Respond to concerns, accommodation issues and competing accommodation needs related to Service Animals.
- h)** Protect the confidentiality of personal information collected during the accommodation process in accordance with applicable privacy legislation and University policy.
- i)** Review accommodations periodically or where circumstances materially change to ensure the accommodation continues to meet the Handler's disability-related needs.

12.3. Student Accessibility Services is the designated Authority for Students with Service Animal requests.

12.4. Human Resources is the designated Authority for Employees with Service Animal requests.

12.5. The Handler will be responsible for the behavior, management and care of their Service Animal at all times. The Handler will:

- a) Keep the Service Animal is restrained on a leash, in a crate , or under the physical control of the Handler (unless being unrestrained is necessary to perform their tasks or functions.
- b) Accompany the Service Animal at all times and ensure that it remains in close proximity to the Handler.
- c) Maintain the Service Animal's crate or cage (if it is to be crated or caged) to ensure it is the appropriate size, secure, in good repair and well ventilated.
- d) Maintain the health and welfare of the Service Animal is maintained and food, water, bathroom and exercise breaks are provided in a timely manner.
- e) Keep the Service Animal clean and groomed at all times. Clean up and dispose of any animal waste in a timely manner. Handlers who are not physically able to pick up and dispose of waste are responsible for making all necessary arrangements for assistance;
- f) Ensuring the Service Animal maintains up-to-date vaccinations as required, and to provide proof of vaccination records if requested by the Authority.
- g) Ensure that the Service Animal demonstrates positive and pro-social behaviour at all times while on Campus. Although formal training is not a legislative requirement, it is in the best interests of the Handler to ensure that their Service Animal has been trained by a reputable organization where appropriate for the species. The Campus environment has many opportunities for unique situations for Handlers and their Service Animals to encounter. Training can teach the animal how to respond to various situations on Campus that can give rise to problematic behaviour which can be very distressing for their Handlers.

12.6. Instructors/Faculty will

- a) Provide an inclusive environment for those being accompanied by Service Animals.
- b) Refrain from providing assistance or otherwise interfering with the Service Animal unless expressly requested by the Handler.
- c) In the event of a health and safety concern, in consultation with Student Accessibility Services or the Office of Human Rights, may direct a Handler to control or temporarily remove their animal from the classroom. When there is a question as to whether a Service Animal is allowed in a specific space, the

Authority will assess on a case-by-case basis in accordance with the process for High Risk Areas.

- d) Support implementation of approved accommodations and identifying concerns requiring further review. Faculty members will consult with SAS if a Student is non-compliant with this Procedure and SAS will determine if the student is permitted to use or continue to use a Service Animal on Campus.

12.7. Office of Risk Management

- a) Supports risk assessments for High-Risk Areas.
- b) Consults with SAS, HR and relevant academic or operational units.
- c) Develops recommendations to mitigate identified risks.
- d) Provides guidance regarding legislative or operational restrictions.

12.8. Office of Campus Safety

- a) Responds to immediate safety concerns involving Service Animals.
- b) Assists with addressing disruptive or threatening behaviour where necessary.
- c) Documents and communicates incidents to the appropriate Authority.
- d) Supports implementation of safety measures identified through the accommodation process.

12.9. University Supervisors, Managers, Directors, and Faculty Administrators

- a) Support implementation of approved accommodations within their work units.
- b) Collaborate with SAS or HR regarding accommodation planning.
- c) Participate in risk assessments where appropriate.
- d) Address operational issues in consultation with the appropriate Authority.

13. Circumstances Where Access May Be Restricted

- 13.1.** In most circumstances, approved Service Animals will be permitted on Campus. An individualized assessment to consider restrictions may be required where: i) municipal, provincial or federal legislation prohibits the presence of certain animal species; and/or ii) where the presence of a Service Animal poses a demonstrable health or safety risk that cannot be reasonably mitigated;
- 13.2.** Where a Service Animal is repeatedly disruptive, aggressive, or otherwise poses a significant risk to the learning, working or living environment, the appropriate Authority will work with the Handler to address the concerns. If the concerns cannot be reasonably resolved, the University may impose conditions on the Service Animal's continued presence or require that it be removed from Campus.
- 13.3.** A decision to limit or restrict access will not be based on assumptions, stereotypes or generalized concerns about Service Animals. All decisions will be based on

objective evidence, the specific circumstances of the request, and the University's obligations under the Ontario Human Rights Code and applicable legislation.

14. Review of Decisions

- 14.1.** Individuals who disagree with a decision regarding a Service Animal accommodation may request a review through the applicable accommodation process administered by Student Accessibility Services or Human Resources, as appropriate.

15. Protection of Privacy

- 15.1.** The University is committed to protecting the privacy of all University Members, including Students requiring accommodations, in accordance with commitments in its Procedures to accommodate Employees and Students.

MONITORING AND REVIEW

- 16.** These Procedures will be reviewed as necessary and at least every three years. The Deputy Provost, or successor thereof, is responsible to monitor and review these Procedures.

RELEVANT LEGISLATION

- 17.** Ontario Human Rights Code, R.S.O. 1990, Chapter H.19
Ontario Human Rights Commission Policy on Guidelines on accessible education (2004)
Freedom of Information and Protection of Privacy Act, R.S.O. 1990
Ontario Occupational Health and Safety Act, R.S.O. 1990, Chapter O.1.
Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005
Integrated Accessibility Standards Regulation, O. Reg. 191/11

RELATED POLICIES, PROCEDURES & DOCUMENTS

- 18.** Accessibility Policy
Accommodation Policy
Respectful Campus Policy
Accessible Customer Service Policy
Procedures for Academic Accommodation for Students with Disabilities
Procedures for Accommodating Employees and Job Applicants with Disabilities
Academic Regulations, Undergraduate Academic Calendar
Policy on the Care and Use of Animals in Research and Teaching
Booking and Use of University Space Policy
Booking and Use of University Space Procedure

Service Animal Request Form

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