

**Accessibility Policy of the University of Turku 2020–2024**

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# INTRODUCTION

The objective of the Accessibility Policy is to promote the accessibility of the University and develop practises and operations that support accessibility and are also required by legislation.

The Policy aims to increase the available information on accessibility and raise the awareness of the University’s personnel and students on accessibility matters as well as make the accessibility information better available for everyone in an accessible format. The objective of the Policy is to make the internal distribution of work at the University clearer when it comes to accessibility matters and set short and long-term goals for the work. The goal is to better take into consideration and engage many types of actors, paying attention especially to diverse learners, people with different types of disabilities and chronic diseases, members of the University community who represent gender, culture, and language minorities, and other groups mentioned in the Non-discrimination Act as well as to follow the realisation of the objectives.

Accessibility means the possibility for all types of actors to participate and act equally in the University community, regardless of their personal characteristics.

Accessibility can be examined from the perspectives of the physical and mental environment, social interaction, values and attitudes, and politics. At its core, accessibility is a matter of realising civil and human rights.

Accessibility activities have been an ongoing effort at the University of Turku since 2001. Started by the students’ initiative, the activities have expanded over the years to concern all students and members of staff. For some, accessibility may signify automatically opening door, while for others, it may mean making individual exam arrangements or the understandability of the web pages.

The increase in the number of diverse learners and the specifications to the accessibility legislation, e.g. the Web Accessibility Directive coming into force, have for their part increased the need to make the accessibility activities visible and develop them further.

On 21 December 2018, the former Rector of the University of Turku Kalervo Väänänen appointed a Steering Group with wide representation from the central operations of the University. (The assembly of the Steering Group: Appendix 1) The task of the working group was to create, plan, and write a policy for barrier free University. When beginning its activities, the Steering Group stated that the objectives set for the policy widely concern the different operations of the University, e.g. Communications, education, IT Services, and the staff. This is why it was decided that it be changed into Accessibility Policy.

The Accessibility Policy of the University of Turku 2020–2024 maps the current state of the University’s accessibility and objectives in relation to studying, teaching and guidance, Human Resources and working, constructed physical environment, Communications, IT, and the Library.

Accessibility can be considered to apply to all operations of the University. It can be perceived as a fundamental principle that can be used to analyse the different activities and actors of the University. On the other hand, it signifies slightly different kind of things and processes in different operations. This is why the Accessibility Policy analyses matters from the perspective of the main operations. First, the Policy describes the current state of affairs which created the basis for naming the objectives of the activities, appointing the actors, and planning the timetable. In many cases, the processes and objectives touch on multiple operations, and the actors can share responsibilities for the activities and reaching the goals as they deem natural. The Policy also aims to make this kind of co-operation visible.

It is almost as important to actively assess the activities as it is to realise the accessibility activities and set objectives. The units are responsible for assessing the realisation of the objectives in their own activities while the Equality Committee oversees the realisation of the whole Policy on University-level.

# BACKGROUND OF THE ACCESSIBILITY POLICY

* 1. **What is accessibility and whom does it concern?**

Accessibility refers to enabling the equal participation of all types of actors in different types of situations and environments regardless of the characteristics of the actors.

Accessibility can be examined from many different perspectives:

* + - *physical environment* – moving, hearing and seeing, ergonomics, aids, safety
		- *mental environment* – respecting diversity as a resource, respecting competence, being heard
		- *social environment* – the community’s knowledge, skills, and attitudes towards different types of needs
		- *communications* – receiving information, clarity of communications, use of multiple channels
		- *financial accessibility* – acknowledging e.g. the assistants, interpreters, and aids of disabled people, compensating for commute to work

Accessibility consists of e.g. equal opportunity to use different types of operational environments, services, applications, and publications, but it can also refer to the openness of attitudes or consideration of diversity in planning operations, strategies, and policies. In the University community, accessibility is seen as a policy crossing all functions and an objective which should be taken into consideration in all planning, activities, and feedback.

Accessible and barrier free are often considered to mean the same thing. However, barrier free normally refers to the physical operational environment while accessibility refers to the accessibility of services, attitudes, and policies. In this Accessibility Policy,

the term “accessibility” also covers the physical operational environment of the University, the buildings and the areas surrounding them, as well as the guidance on the campus areas.

Accessibility includes and concerns all actors of the University, from occasional visitors to the University Management. Accessible solutions benefit all users: for example, automatic doors can be useful to people using aids, people pushing baby strollers, and people who are carrying heavy loads. However, accessibility is also necessary for those students and members of staff whose activities in an environment with physical, mental, or social barriers become more difficult or impossible.

An increasing number of actors need accessibility information in their work or studies, for example, when planning learning materials or booking facilities for a social gathering or a meeting. The objective of the University’s Accessibility Policy is to enable people to receive the required accessibility information and to support people in realising and taking advantage of accessibility.

# Overview of the accessibility activities implemented at the University of Turku

The accessibility activities of the University of Turku started in November 2001 when the Rector at the time Keijo Virtanen appointed a working group to develop accessibility in the University of Turku. The task of the working group was

* + - to assess the factors interfering with studying from the perspective of students with different kinds of disabilities
		- to compile practical suggestions for removing these interfering factors with the goal of creating equal opportunities to study
		- to prepare a plan for recognising the needs of disabled students when building new facilities and renovating old ones, and
		- to prepare a proposal for the measures and co-operation methods that can be implemented when considering the perspective of people with disabilities when developing the physical operational environment, teaching, studying, student services, flow of information, and other factors that the people with disabilities themselves consider obstacles.

The working group was named “Barrier free UTU” (Esteetön UTU) and it included a wide representation from different units of the University, such as the Library, IT services, Facility Services and technical services, International Office and Student Affairs, Communications, faculties, Student Union, and as the representative of associations for disabled people, the Threshold Association.

During its operations, the working group made seventeen different measure proposals. It proposed e.g. the recognition of the needs of student with different types of disabilities in the University’s Strategy and prepared an extensive accessibility mapping of the University buildings from the perspective of people using aids. Some of the proposals led to measures such as implementing an accessibility mapping which also takes into consideration visually impaired people and mapping of new buildings. People with sensory disabilities and different types of learning difficulties were also taken into consideration in the reporting and the proposals for measures. (Record of the Barrier free UTU working group of the University of Turku, University of Turku 2002, 1–6)

In 2004, a follow-up group started operating with the objective of making observations

about the results and success of the measures. The follow-up group ended up proposing the establishment of an Advisor on Disability Issues position in the University of Turku. The Advisor on Disability Issues began working at the University of Turku in February 2005. The position was first funded with an allowance given by the Rector of the University. In the spring of the same year, funding was received from the Ministry of Education and Culture to cover the expenses for a three-year period. Around the same time, the University of Jyväskylä started a national project focusing on the accessibility activities of higher education institutions, the Inclusive Higher Education project (Esteetön opiskelu korkea-asteen oppilaitoksissa (ESOK)). The University of Turku actively participated in the project as well as the continuation project in which it was the university coordinator in 2011–2013.

It became apparent right from the start of the operations of the Barrier free UTU working group that the barriers in the University are largely caused because people do not happen to think about these matters.

The final report of the Advisor on Disability Issues project stated that the success of the accessibility activities can be viewed from two perspectives: the development in the visible results and the development in people’s attitudes (Kohti esteettömämpää Turun yliopistoa, 2008, 28–29, in Finnish).

In 2005, an extensive accessibility mapping was completed on the buildings of the University of Turku from the perspective of mobility and visibility barriers accompanied by proposals for measures to promote accessibility. (Kumpuvuori, 7 July 2005, unpublished record) The information obtained with this mapping has been added to the [Turku for All](http://www.turkukaikille.info/index.php?lang=eng) portal which includes accessibility information about the different services in the Turku region.

The accessibility mapping was completed in autumn 2017 for the facilities of Agora, Educarium, Turku School of Economics, Natura, and Publicum buildings. (Johnsson & Pietilä 2018, [Luentosalien esteettömyyskartoitus Turun yliopistolla 2017](https://www.utu.fi/sites/default/files/public%3A/media/file/luentosalien%20estetto%CC%88myyskartoitus%20Turun%20yliopisto_2017.pdf), in Finnish). Furthermore, the accessibility of individual facilities and buildings and accessibility assessments of new buildings and buildings under renovation have been completed annually in cooperation with the Facility Services, the users, and disability organisations.

At the beginning stages of the activities of the Steering Group for the Accessibility Policy, a short assessment was made on the accessibility information currently available on the University’s website and intranet pages.

The result of the assessment was that there was plenty of information available, but it was scattered across the University’s web pages. Because of this, ["Saavutettava Turun yliopisto”](https://www.utu.fi/fi/yliopisto/saavutettavuus) and ["Accessibility at University of Turku"](https://www.utu.fi/en/university/accessibility) websites were created to compile the accessibility information in one place. Moreover, the Group has considered how to develop web accessibility to correspond with the requirements of the Web Accessibility Directive, make it easier to receive information, and promote co-operation between different units in accessibility matters.

Over the past few years, accessibility thinking has become more prevalent in Finnish higher education. For example, the University of Turku has made recommendations about individual arrangements in education. The amount of individual arrangements has tripled during the period of 2012–2017. However, accessibility is seen as a factor that concerns all actors in higher education institutions, not only as a special question related to students with disabilities and diverse learners.

In addition to the growing number of applicants and accepted students, the more precise and extensive legislation has had an impact on the increase in accessibility activities and their diversity. The increase in the amount of work has been prominent especially in faculties and units in the increased work load of individual teachers, counsellors, and office personnel.

The new, broader definition of the term accessibility has also brought about questions related to cultural and language minorities as well as gender minorities. At the same time, the emphasis in the accessibility discourse has moved from individual people or groups towards the university institution: accessibility is not only a question of practises, instructions, or environment, but also policies and values – what the University is, who is it meant for, and what do we want to build it into.

# Legislation, guidelines, and operators related to accessibility and non-discrimination

The accessibility of higher education and non-discrimination in universities is regulated by multi-faceted and multi-layered legislation. The following part will include short introduction to the national legislation and the university-level norms and regulations.

# National legislation

# Non-discrimination Act

On a constitution-level, the non-discrimination in education is centrally regulated by the

[Non-discrimination Act](https://www.finlex.fi/en/laki/kaannokset/2014/en20141325) (1325/2014): “Nobody may be discriminated against on the basis of age, ethnic or national origin, nationality, language, religion, belief, opinion, political activity, trade union activity, family relationships, state of health, disability, sexual orientation or other personal characteristics. Discrimination is prohibited, regardless of whether it is based on a fact or assumption concerning the person him/herself or another.” (Section 8)

It should be noted that in addition to direct and indirect discrimination, harassment, denial of reasonable accommodation as well as an instruction or order to discriminate constitute discrimination as referred to in the Act.

Refusing reasonable accommodation (Section 15) means that an authority, education provider, employer or provider of goods and services who fails to make due and appropriate adjustments necessary in each situation for securing the equality of a person with disabilities is guilty of discrimination.

The Non-discrimination Act obliges the education provider and the educational institution to evaluate the realisation of equality in their activities and to promote its realisation (Section 6). In practise this is realised with the help of an equality plan. The equality plan is used to assess the realisation on equality at the moment and decide on the practical measures to promote equality and interfere with discrimination. <https://www.syrjinta.fi/koulutus-ja-varhaiskasvatus>, in Finnish). The University of Turku has an operative [Equality Plan](https://www.utu.fi/en/university/strategy-and-values/equality).

**Land Use and Building Act, accessibility instructions of the Ministry of the Environment** The accessibility of buildings and their yards is regulated by [the Land Use and Building Act](https://finlex.fi/en/laki/kaannokset/1999/en19990132) (132/1999) and [Government Decree on Accessibility of Building](https://www.ym.fi/en-US/Land_use_and_building/Legislation_and_instructions/The_National_Building_Code_of_Finland/Accessibility) which came into effect in May 2017.

The minimum requirements set for the accessibility of buildings are meant to promote equality for their part. The Decree applies to the construction of a new administrative, service, office, business, warehouse, production, and residential building subject to permit under section 125 of the Land Use and Building Act. (Esteetön rakennus ja ympäristö (in Finnish), Rakennustieto Publishing, 13).

The instructions of the Ministry of the Environment on auditoriums and teaching, meeting, and restaurant facilities state the following:

* + - * “If an auditorium or an assembly, meeting, or restaurant hall, teaching facility or other corresponding place for assembly has a sound system, it must include an induction loop or other corresponding system for aiding customers who wear hearing aids.”
			* “If the facility referred to in subsection 1 has fixed seats, the accessible entrances must lead to more than one rows of seats and they must include an adequate number of wheelchair seats.”

Additionally, the guidelines on public buildings state that their parking lots must also include parking space marked for the disabled and the entrances of the buildings must be barrier free for the users of wheeled aids.

# The Web Accessibility Directive and the Act on the Provision of Digital Services

The objective of the [Web Accessibility Directive of the EU](https://saavutettavuusdirektiivi.fi/) is that everyone could use web services regardless of their personal characteristics or situation. The Directive promotes everyone’s opportunities to use public services, sets minimum requirements for accessibility, and improves the quality of digital services.

The Web Accessibility Directive and the national legislation based on it require authorities to make their digital services accessible. The [Act on the Provision of Digital Services](https://vm.fi/saavutettavuusdirektiivi) entered into force on 1 April 2019.

The Directive aims to make especially the web services provided by public operators accessible. Accessibility is closely related to the *Web Content Accessibility Guidelines* (WCAG). They include four basic principles that web services must follow:

* + - * The website is *perceivable*, i.e. the contents can be perceived even without the ability to see or hear.
			* The web service should also be *operable*, meaning that the service must be operable without a mouse, moving from one page to another is fluent, the link texts describe the purpose of the link well, and the links describe where they lead.
			* The web services must be *understandable*:The language should be clear and in the case of e.g. forms, the user should be able to understand what is asked and in what form the information should be filled in.
			* The services must be *robust*, i.e. they should function as expected on different browsers and with different assistive technologies.

When developing web services, it should be the objective to aim for at least the AA level of the WCAG. However, the starting point of the Directive is especially the needs of the users. The most important thing should be ensuring that the information is accessible to people with different kind of disabilities. At the moment, the Directive only concerns public administration.

In Finland, the Web Accessibility Directive is implemented by the [Act on the Provision of Digital Services](https://vm.fi/saavutettavuusdirektiivi). According to the Act, the service provider must ensure that the contents of their services are perceivable and understandable as well as make sure that the interface and navigation are operable and robust as per the accessibility requirements. The service provider must maintain an accessibility statement which includes e.g. instructions on how the user of the service can access the information included in the digital service or the service with an alternative method if the service or parts of it are not in an accessible format. The statement should also include electronic contact information of the service provider where the user can send feedback on accessibility.

# Diversity in work communities and the legislation on accessibility at the workplace

As an authority, employer, and provider of education, the University is bound by the [Non-discrimination Act](https://www.finlex.fi/en/laki/kaannokset/2014/en20141325) (1325/2014) and the [Act on Equality between Women and Men](https://www.finlex.fi/en/laki/kaannokset/1986/en19860609) (609/1986). When recruiting employees or during employment relationship, the University is prohibited to put applicants or employees in unequal positions on basis of gender or other reason related to the person. The University of Turku has an Equality Plan in accordance with the Non-discrimination Act and the Act on Equality between Women and Men.

The objective of the legislation and guidelines on accessibility is to help and support everyone who engages in accessibility activities and those concerned by accessibility, i.e. in practise everyone, at least at some point of their lives.

# The Universities Act

According to the [Universities Act](https://www.finlex.fi/en/laki/kaannokset/2009/en20090558), factors relating to the health and functional capacity of an applicant may not preclude admission. However, a person whose state of health or functional capacity makes him or her incapable of performing the practical tasks or practical training included in the studies in a way consistent with the study-related safety requirements referred to in section 43a and where the impediment cannot be removed with reasonable measures shall not be admitted as a student.

In the case of studies referred to in section 43a, admission is precluded where a decision has been made to revoke the right to study under section 32 of the Vocational Education and Training Act (630/1998), under section 11(9) of the Adult Vocational Education and Training Act, under section 25a of the Polytechnics Act (351/2003) or under section 43a of this Act where considerations relating to the protection of the health and safety of other persons so require.

The university must inform applicants about health-related requirements and other prerequisites related to the studies.

# Regulations and instructions of the University of Turku

# University of Turku Rules of Procedure

The operations of the University of Turku are directed by the University of Turku Rules of Procedure. They outline the missions, organisation, and management practises of the University. The Rules of Procedure and the Universities Act define, for example, the competence requirements for certain positions at the University, especially for the positions of teaching and research staff. Furthermore, it states that the person selected for the position is, taking into account non-discrimination and equality matters, the person who is deemed the best to succeed in the position.

# Equality Plan of the University of Turku

The Equality Committee prepared the [Equality Plan](https://www.utu.fi/en/university/strategy-and-values/equality) currently in force at the University with the goal of promoting non-discrimination and equality and preventing direct and indirect discrimination and harassment at the University.

# University of Turku Regulation on Studies

In the [University of Turku Regulation on Studies](https://intranet.utu.fi/en/sites/regulation-on-studies), it is stated in section “Realisation of education and student guidance” that accessibility and the individual conditions of students with disabilities and learning difficulties must be taken into account in the study methods, study materials, and duration of the examination. In order to ensure non-discrimination, students with different kinds of disabilities, chronic diseases, and learning difficulties will be provided with reasonable arrangements that promote accessibility and are considered necessary for studying or the study attainment because of the students’ disability, illness or learning difficulty.

# Rector's Decision

The Rector’s decision “Recommendation on Special Arrangements for Students with Disabilities and Diverse Learners” (only available in Finnish, corresponding contents at [Guidelines on Special Arrangements for Students with Different Needs](https://www.utu.fi/sites/default/files/public%3A/media/file/Guidelines%20on%20Special%20Arrangements%20%284%29.pdf)) describes the individual arrangements in entrance exams and studying and the processed related to them in more detail.

# Actors in equality and accessibility matters at the University of Turku

* **Equality Committee**

The task of the Equality Committee is to promote and assess the realisation of equality and non-discrimination and their development at the University of Turku. The Committee prepares the Equality Plan of the University which is then approved by the University Board. The objective of the Equality Plan is to promote non-discrimination and equality as well as prevent direct and indirect discrimination and harassment. The Student Union is also represented in the Committee.

# Advisor on Equality Issues

The Advisor on Equality Issues in the Study and Work Well-being Services gives instructions on matters related to non-discrimination of a person both for students and the staff. They collaborate with the Equality Committee. In addition to giving instructions and information, the position of the Advisor on Equality Issues also includes the assessment and documentation of work situations related to equality issues. The email address of the Advisor on

Equality Issues is tasa-arvovastaava@utu.fi.

# Accessibility Planning Officer

The Accessibility Planning Officer from the Study and Work Well-being Services gives advice and guidance on matters related to accessibility of studying and teaching and accessibility of the University both for students and the staff. The email address of the Accessibility Planning Officer is esteet@utu.fi.

# Co-operation in accessibility matters

The University collaborates closely in accessibility matters with different actors inside the University as well as externally with nationaland international partners.

One of the most important co-operation partners is the Student Union of the University of Turku (TYY) which promotes the interests of students and assesses and promotes the realisation of accessibility at the University. In promoting students’ interest, the objective of the Student Union is making students’ voice heard in accessibility activities, making sure education is arranged in an accessible manner, and making the University an accessible and barrier-free environment.

The Student Union also evaluates and develops the accessibility of their own activities. The Student Union reforms their website in 2021, and one of the premises of the reform is improving the accessibility of the website. The accessibility of the Student Union’s office and rental premises has been mapped, and this mapping will be used as a basis for improving the physical accessibility of the office with financially achievable measures.

The Student Union has compiled an Equality Program with definitions of the targets and measures of the non-discrimination activities. The main objective of the Program is an equal University community with no discrimination. The Equality Program is updated in 2020. The Student Union offers the students opportunities to participate in building a more equal and accessible Union through e.g. trustee positions or participating in the activities of its Wings, i.e. volunteering.

The University of Turku also actively co-operates in accessibility matters with the City of Turku, the authorities of the state and municipalities, associations for the disabled and civic organisations, and the higher education institutions in the Turku region as well their student unions. The University of Turku is also a participant in the accessibility network of the higher education institutions in the Turku region.

On a national level, the University of Turku is an active member of the Inclusive Higher Education project (Esteetön opiskelu korkea-asteen oppilaitoksissa (ESOK)). On international level, the University participates in the activities of the Nordic Network for Disability Coordinators.

# POLICY PROGRAMME

**Accessibility in the activities and services of the University**

Accessibility benefits all users, but for some groups the accessibility of activities means a concrete opportunity to participate and act as a student, employee, or visitor at the University with the same opportunities as everyone else.

Accessibility needs to be a fundamental principle in all of the University’s services. Because of this, the questions related to accessibility may be similar in different functions and accessibility may be the concern of many different services or functions at the same time, requiring close collaboration between different services to be realised.

The work communities of the University are increasingly diverse. Diversity means differences that are defined by e.g. age, gender, disabilities, health, ethnic origin, religion, or sexual orientation. Everyone should be treated the same and should not be put in different position or discriminated against due to their differences. This applies to both the employees, students and other actors at the University, customers, and visitors.

For the University, diversity is a resource which promotes the development of activities and services as well as the results. A diverse work community is able to adapt work, utilise different work methods and measures so that people with different backgrounds or e.g. work ability can best showcase their abilities and expertise. Often, the only adaptation needed is a change in attitudes.

# Student selection, studying, teaching, and guidance

# Current state

Students are numerically the most significant group at the University, so when promoting the accessibility of the University, the matters related to studying and education are in a central role.

It is possible to apply for individual arrangements such as extra time due to disability, illness, or difficulties with learning or reading. The Accessibility Planning Officer of the University compiles a recommendation of special arrangements for entrance exams based on an application and expert opinion, and the faculty decides on the implementation of the special arrangements.

The special arrangements in studying have been established in the Regulation on Studies.

The general accessibility of teaching and guidance are affected by many factors such as the physical accessibility of teaching facilities and the accessibility of online learning environments and learning and guidance materials. The updated accessibility instructions as well as the awareness of the staff on the instructions and the opportunity to receive support and training affect the realisation of accessibility in teaching and guidance. Additionally, the resources available have had a practical impact on the general realisation of accessibility.

There are currently many actors working on matters related to studying and guidance who also develop the accessibility of studying and guidance for their own part. These type of actors include e.g. teachers, heads of academic and student affairs, student advisors, academic advisors, study psychologists, and the Accessibility Planning Officer.

The Departments need more precise instructions on how much adaptations can and is reasonable to be done. More information and instructions are also needed on illnesses caused by poor indoor air quality and the individual arrangements related to them.

# Measures

**Individual arrangements for studying**

* + - Clarifying the recommendation on special arrangements and explaining the grounds for granting special arrangements. Compiling a separate sheet on the policies of individual study arrangements following the model of Tampere University and updating the Rector's Decision ”Recommendation on Special Arrangements for Students with Disabilities and Diverse Learners”.
		- Improving the opportunities to realise special arrangements in practise: planning functional accessible exam rooms and other teaching or studying facilities that enable the use aids and aid programmes and implementing other special arrangements.
		- Taking into consideration the accessibility perspective in guidance and increasing e.g. online guidance.
		- Offering information on individual arrangements in international mobility, both for incoming exchange students and outgoing students. Offering information also in English.

# Learning materials and online learning environments

* + - Ensuring that the information offered by the University is accessible and serves all students. For example, accessible lecture materials in online learning environments should be better available for students to use.
		- Ensuring the accessibility of electronic learning materials as required by the legislation on accessibility of digital services.
		- Compiling instructions on the accessibility requirements for learning materials and offering tools, training, and advice for the staff.

# Human Resources Development, recruiting, and working conditions

# Current state

Personnel training is based on the personnel and training plan compiled annually. The training needs are collected with a questionnaire on training needs sent to the supervisors. The supervisors are instructed to collect information on the training needs from all of their employees in development discussions and compile the most central needs of their work community based on these discussions.

Personnel trainings are open for all and grantees can also participate in them. Training sessions are also offered in English and as remote training. Study and Work Well-being Services regularly organises personnel training on accessibility and non-discrimination to increase the awareness of the entire

University community on what accessibility means and how everyone can promote it in their work.

The University Rules of Procedure and the Universities Act directly define the qualification requirements for certain positions at the University, especially the positions of teaching and research personnel. The recruitment announcements do not include assumptions on a certain type of applicant.

 The recruitment interview is held in a barrier-free facility when necessary.

The accessibility of the work place is ensured for the different areas of accessibility, i.e. for the physical, social, communicational, and financial environment. This also includes taking into consideration the use of services offered by society, such as the use of personal aids (e.g. wheelchair, hearing aid, guide or assistance dog) or personal assistant, interpreter, or guide.

By adapting the working conditions, it is easy to achieve significant improvements. Adapting the working conditions refers to arrangement of working hours, remote working opportunities, organising the work, and matters related to the work environment and information technology, among others. The employee can also be supported to reach the same starting point as others with positive different treatment. According to the Non-discrimination Act, positive different treatment is possible and should be the goal if there is danger that the person would be disadvantaged without it. It is worth remembering that even small adjustments can be significant for the individual and prolong their ability to work by several years.

# Measures

# Human Resources Development

* + - Increasing the number of trainings that can be followed remotely or completed online and developing the user-friendliness of the staff training calendar.
		- Taking accessibility into consideration more than before when choosing training facilities.
		- Adding a function in the sign-up form so that the person signing up for training can tell about their possible special needs related to the facilities and aids.
		- Increasing the amount of training on accessibility matters offered for the teaching and guidance staff. One way to increase awareness on accessibility matters is to appoint accessibility contact persons to the faculties and departments and educate those who are interested in the position or/and add a study course on the matter in the university pedagogics module.
		- Offering the staff opportunities to learn to use tools that improve accessibility.
		- Ensuring that everyone that produces content to the University’s communication channels know the accessibility criteria and are able to produce content in accordance with them.

# Recruiting

* + - When defining the requirements for the position, verifying the contents and understandability of the recruitment announcement. For example, if the position requires social skills and the ability to collaborate with others, describing what kind of skills are required and in what kind of situations they are needed.
		- Highlighting the role of the University of Turku as an employer that maintains and develops non-discrimination and accessibility when announcing open positions.
		- Developing the opportunities for team interviews and remote interviews. Taking into consideration arrangements on working hours, accessibility and aids when recruiting a person with accessibility-related needs.

# Working conditions

* + - Developing the work facilities of the University to be more accessible than at the moment. Paying attention to the needs of both new employees and those already working at the University in relation to work facilities and work ergonomics in the case of employees or situations that require special arrangements.
		- Taking advantage of workplace adaptations more than before. The adaptation of working conditions can concern either the individual or the entire organisation. It can, for example, include professional guidance and counselling, training, help given by others, arrangement of working hours, developing the work environment, and organising the work, by e.g. developing the remote working opportunities.

# Physical environment

# Current state

The facilities of the University of Turku are located on three campus areas in Turku: the University Hill, the lower campus, and Kupittaa campus. Additionally, there also facilities at Rauma, Pori, Seili, Kevo, and Ruissalo, Turku. Physical environment refers to facilities, yards and parking areas, guidance both outside and inside the facilities, and the furniture and material choices.

The facilities of the University are located in many different types of buildings which have been built during different decades. Partly due to this, there is fairly large variation in terms of barriers and accessibility. The buildings that have been completed after 2000 are fairly accessible and the accessibility matters have been taken care of for the most part. Accessibility is far more difficult to realise in older buildings. For example, already the terrain of the University Hill causes it to be difficult to access.

Many of the University’s facilities are still not physically accessible: for example, Turku School of Economics is lacking door-opening mechanisms and the exam rooms on the Rauma campus are located in a place with barriers and many of the campus areas lack sufficient guidance.

The older facilities have been improved by installing automated doors, building elevators, adding accessible toilets, and improving the lighting and guidance. Removal of barriers and improvement of accessibility is an ongoing development.

# Measures

* + - Developing and clarifying the processes and measures related to the mapping, planning, and assessment of accessibility together with the Accessibility Representative of Turku region, organisations, and other operators.
		- Improving the accessibility of entrances (by e.g. adding automated doors).
		- Developing the accessibility of teaching facilities. The most acute measures at the moment are mapping and improving the accessibility of the facilities at Turku School of Economics and arranging accessible exam rooms to Rauma and Pori.
		- Improving the lighting on the campus area and making it more consistent.
		- Improving the physical guidance on the campus area and making it easier to find accessibility information online as well as making both factors more consistent.
		- Ensuring the quality of winter maintenance.
		- Preparing for different types of emergencies (power blackouts, accessibility of emergency exits).

# Communications and IT Current state

The accessibility of Communications and IT Services means communicating as clearly and understandably as possible as well as services that operate with the same principles.

From the accessibility perspective, this means taking into consideration especially those who have difficulties in understanding the contents or the language or who are using different modes of communication. Accessibility is related to communication channels, the contents of the message, and the services that are used.

The University pays attention to customer-friendliness and usability in the production of communications and IT services. At the University of Turku, the University Central Services were reformed in 2017 with one of the objectives being creating clear and uniform service paths and functions. This is helpful, for example, in situations where a person does not know where to ask for help as the Central Services staff is able to guide the person to the correct employee.

The accessibility statements of the new web services have been completed and the accessibility of the web services has been assessed in autumn 2019. Accessibility was emphasised in e.g. the creation of the University’s new utu.fi website. The accessibility statement of the website has been published and can be found here: [https://www.utu.fi/en/accessibility-statement](https://www.utu.fi/fi/saavutettavuusseloste). Accessibility assessments and statements have also been completed for other online services.

The University communicates using multiple channels to ensure that everyone can access the contents. Primarily, clear spoken and written standard language is used in the communications. Leaflets, guides, announcements, and news include clear language and visual designs. These can be accompanied by e.g. picture symbols when needed. In addition to Finnish, the University uses English in its communications.

However, the perspectives of removing barriers and accessibility have not received enough attention. The instructions and practices have not been written out, but the information has been passed from employee to employee as tacit knowledge. The University needs uniform instructions and modes of operation to help take accessibility into consideration in a consistent way in the communications and IT services of all units.

The University must acknowledge the needs of all types of communicators in all of its operations.

The objective is making all of the University’s web services accessible. Ensuring that accessibility is considered when acquiring new information systems. For example, when the University starts to reform its intranet pages, they are designed to be in accordance with the accessibility requirements.

# Measures

* + - Accessibility feedback is directed to the Registry (kirjaamo@utu.fi). Creating uniform procedures for handling feedback and responding to it as well as instructions on which units the accessibility feedback of certain themes should be forwarded to for responding.
		- Assessing the accessibility of services and compiling accessibility statements on them. Supporting the owners of the University’s information systems in ensuring the accessibility of the services.
		- Acquiring information on completing accessibility mappings and creating the modes of operation that help the University community compile accessibility statements and keep them up-to-date. Creating methods for ensuring accessibility on web sites and online services controlled by the University community.
		- Finding ways to make videos and podcasts meet the requirements of the Directive.
		- Compiling instructions for highlighting accessibility requirements in procurement documents.
		- Compiling instructions on the intranet pages on the practices and methods that improve accessibility and organising training on producing accessible materials (e.g. videos, podcasts, brochures).
		- Assessing the possibility of installing a screen reader software on the workstations of the University.
		- Compiling accessibility materials, such as accessibility statements, also in English. Compiling a glossary of the accessibility terminology in English.
		- Ensuring that online applications are accessible for everyone (e.g.compatibility with screen reader applications and easy to use).

# Library Current state

The objective of the Library is to make the use of the library services as barrier-free as possible and make the data accessible. The data procurements of the Library are increasingly consisting of electronic formats which offer better opportunities to improve accessibility. Electronic materials can be used by the customers irrespective of time and place which decreases the role of physical barriers in their use.

The accessibility of the services offered by the Library is improved often with different measures, taking into consideration the individual needs of the customers. The students who have difficulties with reading can receive continuation to the loan period of course books and customers with mobility challenges can order the printed materials for pick-up from the branch of their choosing. The Library helps to extend the services of the Celia centre for accessible literature and publishing broadly for the whole University community. All library units include reading spots and/or workstations with computers that can be used by people in wheelchairs. Furthermore, the Library offers two study rooms for diverse learners in the library of Calonia, with priority booking to those students whose individual arrangements include mention of the use of the rooms.

Guide and assistance dogs are welcome to the Library and almost all units include an induction loop. The accessibility information on the Library’s facilities and information on the services improving the accessibility of the Library have been compiled centrally to the Library Accessibility webpage.

The Library produces its services and guidance such as instructional videos primarily bilingually in Finnish and English. All units of the Library are also open for customers outside the University community and most of the data materials offered by the Library can also be used by people who are not members of the University community.

# Measures

**Common measures improving the accessibility of services and materials**

* + - Sharing information on available services more efficiently by e.g. organising an annual accessibility day.
		- Assessing the option of arranging a work station with a scanner in one of the Library’s units to enable to use of printed materials even for the visually challenged.

# Services related to accessibility in the Library units located outside the Turku campus

* + - Training the library staff at the Department of Teacher Education in Rauma to enable needs assessment for the implementation of the services of Celia library also in Rauma in addition to Turku. This measure also improves the opportunities of the students at the Pori campus to access the Celia services.
		- Confirming that induction loop is accessible at the library of the Department of Teacher Education in Rauma and the Newspaper and Ephemera Services in Raisio.

# Accessibility of services online

* + - Producing subtitles or media equivalents for all of the instructional videos of the Library (also retrospectively when needed).

# POLICY FOLLOW-UP AND ASSESSMENT

The Steering Group for the Accessibility Policy proposes that the assessment and follow-up of the Policy is closely incorporated in the activities of the Equality Committee. The Equality Committee decides on the observation periods and the scopes of the assessments and also decides on what kind of measures are included in the assessment. The follow-up of the implementation of the Accessibility Policy can be realised with the help of e.g. the workplace well-being survey and the feedback channels aimed for the students: the surveys directed at first-year students and Bachelor’s degree graduates.

The practical measures of the Accessibility Policy will be scheduled in stages in the implementation plan which will be updated annually.

The Accessibility Planning Officer compiles an Accessibility Plan (guiding their own work) for the Equality Committee as well as an annual report on their activities. These documents can also be utilised in the Accessibility Policy follow-up and assessment.

Assessment of accessibility is continuous development work requiring a broad perspective and the effort of many different actors. The Policy is assessed with the help of feedback compiled by the units and it is reported in the annual reports. The handling of the accessibility feedback received on online services has also been arranged. More attention is paid to offering the staff information and training on matters related to accessibility.

# REFERENCES (in Finnish)

Celia-kirjasto, Mikä ihmeen saavutettavuusdirektiivi? Blogi-teksti, 18.5.2017, <https://www.celia.fi/Blogi/mika-ihmeen-saavutettavuusdirektiivi/>

Etelä-Suomen aluehallintoviraston ylläpitämä saavutettavuussivusto, <https://www.saavutettavuusvaatimukset.fi/>

Helsingin kaupungin palvelukartta, <https://palvelukartta.hel.fi/unit/25726>

Kilpelä Niina, Esteetön rakennus ja ympäristö. Rakennustieto Oy, 2019.

Kohti esteettömämpää Turun yliopistoa. Vammaisasiamies-projektin loppuraportti. Rehtorinviraston julkaisusarja 1/2008.

Kynnys ry, Turku kaikille. Esteettömyystietoa Turun julkisista ja yksityisistä palveluista, [http://www.turkukaikille.info/](http://www.turkukaikille.info/index.php?lang=eng)

Laki digitaalisten palvelujen tarjoamisesta

306/2019, [https://www.finlex.fi/fi/laki/smur/2019/20190306?search%5Btype%5D=pika&sea](https://www.finlex.fi/fi/laki/smur/2019/20190306?search%5btype%5d=pika&amp;search%5bpika%5d=Laki%20digitaalisten%20palvelujen) [rch%5Bpika%5D=Laki%20digitaalisten%20palvelujen](https://www.finlex.fi/fi/laki/smur/2019/20190306?search%5btype%5d=pika&amp;search%5bpika%5d=Laki%20digitaalisten%20palvelujen)

Laki naisten ja miesten välisestä tasa-arvosta

609/1986. <https://www.finlex.fi/fi/laki/smur/1986/19860609>

Johnsson & Pietilä, Luentosalien esteettömyyskartoitus Turun yliopistolla 2017, julkaistu 2018,

[https://www.utu.fi/sites/default/files/public%3A/media/file/luentosalien%20estetto%CC%88](https://www.utu.fi/sites/default/files/public%3A/media/file/luentosalien%20estetto%CC%88myyskartoitus%20Turun%20yliopisto_2017.pdf) [myyskartoitus%20Turun%20yliopisto\_2017.pdf](https://www.utu.fi/sites/default/files/public%3A/media/file/luentosalien%20estetto%CC%88myyskartoitus%20Turun%20yliopisto_2017.pdf).

Oikeusministeriön tietopankki yhdenvertaisuudesta ja syrjimättömyydestä, <https://yhdenvertaisuus.fi/etusivu>

Poutapilvi, [www.saavutettavuusdirektiivi.fi](http://www.saavutettavuusdirektiivi.fi/)

Suositus vammaisia opiskelijoita ja erilaisia oppijoita koskevista erityisjärjestelyistä. Rehtorin suositus 1.10.2012. Turun yliopisto.

Turun yliopiston Esteetön UTU -työryhmän muistio. Turun yliopisto 2002.

Turun yliopiston saavutettavuusseloste, <https://www.utu.fi/fi/saavutettavuusseloste>.

Turun yliopiston opintojohtosääntö, koulutuksen toteuttaminen ja opiskelijan ohjaus, erityisjärjestelyt.

Valtiovarainministeriön saavutettavuusdirektiiviä koskeva sivusto, <https://vm.fi/saavutettavuusdirektiivi>

Yhdenvertaisuuslaki 1325/2014. Annettu Helsingissä 30.12.2014. [https://www.finlex.fi/fi/laki/alkup/2014/20141325](https://www.finlex.fi/en/laki/kaannokset/2014/en20141325)

Yliopistolaki 11.8.2017/536. [https://www.finlex.fi/fi/laki/ajantasa/2009/20090558](https://www.finlex.fi/en/laki/kaannokset/2009/en20090558)

[https://www.finlex.fi/fi/laki/alkup/2014/20141325](https://www.finlex.fi/en/laki/kaannokset/2014/en20141325)

1. **APPENDICES**

**Attachment 1. The assembly of the Steering Group**

The University of Turku began preparing the Equality Plan in late 2018 as a part of the strategy work. On 21 December 2018, the Rector appointed a Steering Group including wide representation from all the central operations of the University. The task of the Steering Group is to create ideas and plan and write the Plan.

The following persons and actors were included in the Steering Group:

Vice Rector, Professor Riitta Pyykkö, Chair
University Teacher Lilja Aikio, Faculty of Education
Head of Academic and Student Affairs Katja Arola, Educational Affairs
Head of Library Services Ludvig Forsman
Service Manager Terja Hakala, IT Services

Communications Officer Erja Hyytiäinen, University Communications

Personnel Secretary Anneli Lehtimäki, Representative of Personnel

Real Estate Engineer Jussi Lukkala, Facility Services
Accessibility Planning Officer Paula Pietilä, Study and Work Well being Services
Systems Architect Elina Toivanen, IT Services

Specialist, Social Affairs Petra Peltonen (spring 2019), Student Union of the University of Turku (TYY)

Specialist, Social Affairs Ville Ritola (autumn 2019), Student Union of the University of Turku (TYY) Head of Department Mervi Varja, Educational Support Services

Additionally, Director of Study and Work Well-being Services Tom Riski and Human Resources Director Sanna-Mari Tammilaakso also participated in compiling the Accessibility Policy.

The Steering Group has also invited other experts to their meetings when needed.

In the first meeting, the Steering Group appointed Accessibility Planning Officer Paula Pietilä as the secretary of the Group.