Attachment to Regulation no 5 of the Rector of CUT of 21 Jan. 2022

**Accessibility Policy at Cracow University of Technology**

**§ 1 General Provisions**

1. Cracow University of Technology (abbreviated as PK) strives to ensure accessibility to all its resources and services for everyone, including individuals with special needs, and to create conditions for full participation in the university's academic and social life.
2. The Accessibility Policy, hereinafter referred to as the "Policy," is a document outlining actions aimed at eliminating barriers, limitations, and obstacles related to disabilities, illnesses, and other difficulties. Its goal is to provide students, doctoral candidates, and employees of PK with disabilities or other special needs equal opportunities in educational activities, scientific, social, cultural, and sports life, as well as in the workplace.
3. The subject matter of this Policy includes:
	1. principles for ensuring architectural, digital, and information-communication accessibility at PK;
	2. the scope of responsibility of PK's organizational units regarding tasks related to the accessibility mentioned in point 1;
	3. principles for developing an action plan to improve accessibility (hereinafter referred to as the Action Plan) and a report on the state of accessibility (hereinafter referred to as the Accessibility Report);
	4. procedures for handling requests and complaints related to the lack of accessibility.

### § 2 Definitions

The terms used in this Policy mean:

1. **barrier** – an architectural, digital, or informational-communicational obstacle or limitation that prevents or hinders individuals with special needs from participating in various aspects of life;
2. **accessibility** – architectural, digital, and informational-communicational accessibility, at least to the extent specified by the minimum requirements referred to in Article 6 of the Act, achieved through the consideration of universal design or the application of reasonable facilitation;
3. **architectural accessibility** – accessibility related to architectural structures, such as buildings, public spaces, proper signage, and evacuation procedures, enabling the broadest possible group of people to utilize architectural facilities to the greatest possible extent;
4. **digital accessibility** – compliance by a website or mobile application with the requirements specified in the Digital Accessibility Act, allowing the broadest possible group of people to access digital information to the greatest extent possible;
5. **informational-communicational accessibility** – ensuring access to communication via telephone, correspondence, electronic communication, sign language interpreters, or guide-interpreters, enabling the broadest possible group of people to access information and communicate to the greatest extent possible;
6. **person with special needs** – an individual who, due to their external or internal characteristics, or the circumstances in which they find themselves, must take additional actions or employ additional measures to overcome barriers in order to participate in various spheres of life on an equal access basis;
7. **Coordinator** – refers to the Accessibility Coordinator as defined in Article 14 of the Act on Ensuring Accessibility for Persons with Special Needs;
8. **Accessibility Assurance Team** – the Accessibility Assurance Team for Persons with Disabilities, composed of representatives of PK units and appointed by the Rector's regulation;
9. **Accessibility Ambassadors** – individuals who promote and implement accessibility-related activities within their organizational units (faculties, extra-faculty units), including the elimination of awareness-related barriers;
10. **universal design** – designing products, environments, programs, and services to be usable by all people to the greatest extent possible without the need for adaptation or specialized design; universal design does not exclude technical aids for specific groups of people with special needs where required;
11. **reasonable facilitation** – necessary and appropriate modifications and adaptations that do not impose disproportionate or undue burdens and are essential in specific cases to ensure that persons with special needs can exercise and enjoy all human rights and fundamental freedoms;
12. **Act** – refers to the Act of 19 July 2019, on Ensuring Accessibility for Persons with Special Needs (Journal of Laws of 2020, item 1062, as amended);
13. **Digital Accessibility Act** – refers to the Act of 4 April 2019, on Digital Accessibility of Websites and Mobile Applications of Public Entities;
14. **alternative access** – provided on a case-by-case basis when PK is unable, particularly for technical or legal reasons, to ensure accessibility for a person with special needs as defined by the Act; alternative access may involve:
a) providing support from another person to the individual with special needs,
b) providing technical support, including the use of innovative technologies,
c) introducing organizational measures within the university to meet the needs of individuals with special needs to the necessary extent.
Ensuring alternative access is considered equivalent to ensuring accessibility.

**§ 3 General Principles of Ensuring Accessibility at PK**

1. Accessibility for persons with special needs is ensured through the application of universal design, reasonable facilitations, or the provision of alternative access.
2. As part of ensuring accessibility for persons with special needs, PK undertakes actions aimed at:
	1. considering their needs in planned and ongoing activities;
	2. removing and preventing the creation of barriers.
3. Supervision of accessibility assurance at PK is carried out by the Accessibility Coordinator.
4. Responsibilities of the Accessibility Coordinator
5. monitoring the state of accessibility at PK;
6. providing support to individuals with special needs in accessing services offered by PK;
7. preparing the Accessibility Report in collaboration with the Accessibility Assurance Team;
8. preparing and updating the Action Plan in cooperation with the Accessibility Assurance Team and presenting it to the Rector for approval;
9. coordinating the implementation of the Action Plan;
10. overseeing the implementation of actions to improve accessibility for individuals with special needs at PK in accordance with the Action Plan;
11. participating in the preparation of construction and renovation projects to ensure accessibility at PK;
12. defining and updating standards for architectural, digital, and informational-communicational accessibility;
13. organizing training for PK staff on issues related to ensuring accessibility;
14. providing staff with explanations regarding the process of ensuring accessibility and the provisions of this Policy.

5. The Coordinator performs their duties with the assistance of the Office for Persons with Disabilities, in cooperation with the Accessibility Assurance Team and Accessibility Ambassadors, as well as with the involvement of other individuals or units designated by the Rector upon the Coordinator's request.

6. Responsibilities of the Accessibility Assurance Team include:

1. initiating proposals for the Action Plan;
2. supporting the Coordinator in preparing the Accessibility Report and Action Plan and in implementing the Action Plan;
3. monitoring the implementation of the Action Plan by the Coordinator.

7. Responsibilities of Accessibility Ambassadors include:

1. enhancing competencies related to the needs of persons with special needs, legal considerations, and inclusive education;
2. sharing knowledge about inclusive education with staff in their unit and students;
3. informing students about support opportunities available at PK;
4. reviewing documents created within their unit for accessibility compliance;
5. participating in regular meetings of Ambassadors with the Coordinator;
6. collaborating with unit authorities to address accessibility barriers, including architectural, digital, and informational-communicational barriers.

8. Responsibilities of PK organizational units in ensuring accessibility include:

1. providing necessary data for the Accessibility Report and Action Plan at the Coordinator's request, within the scope of the unit's competencies;
2. considering the needs of individuals with special needs in planned and implemented activities, including those related to education and research;
3. removing barriers and preventing their creation;
4. taking action to address observed or reported accessibility-related issues;
5. ensuring communication with individuals with special needs in the form preferred by the individual.

**§ 4 Architectural Accessibility**

1. Minimum Requirements for Architectural Accessibility include:
	1. ensuring that horizontal and vertical communication spaces in buildings are free of barriers;
	2. installing devices or applying technical measures and architectural solutions in buildings to provide access to all rooms, excluding technical spaces;
	3. providing information about the layout of rooms in a building, at least in a visual, tactile, or audible format;
	4. allowing access to the building for individuals using assistance dogs, as defined in Article 2(11) of the Act of 27 August 1997, on Vocational and Social Rehabilitation and Employment of Disabled Persons (Journal of Laws of 2020, items 426, 568, and 875);
	5. ensuring the ability for individuals with special needs to evacuate or be rescued by alternative means.
2. The following persons are responsible for ensuring architectural accessibility at PK:
	1. building managers as designated in the *Building Management Principles* defined by a separate Rector’s regulation, responsible for monitoring the state of accessibility of buildings and implementing measures to improve it;
	2. Construction and Renovation Projects Department, responsible for collecting and analyzing needs arising from accessibility inspections and monitoring the implementation of design works aimed at improving architectural accessibility;
	3. Vice-Rector for General Affairs, Chancellor of PK, and Technical Director, responsible for overseeing the preparation and execution of construction and renovation projects aimed at improving architectural accessibility;
	4. Accessibility Coordinator, responsible for providing opinions during the preparation and execution of construction and renovation projects;
	5. Fire Safety and Defence Team, in coordination with building managers, responsible for ensuring evacuation options for individuals with special needs.
3. Measures to ensure architectural accessibility at PK include:
	1. conducting annual reviews of the state of accessibility of buildings, performed by building administrators or other individuals designated by building managers, in accordance with the *Building Management Principles* defined by a separate Rector’s regulation;
	2. analyzing needs arising from architectural accessibility inspections and incorporating them into planned construction and renovation projects;
	3. preparing construction and renovation projects that address the requirements of ensuring accessibility. A separate procedure defines the principles for consulting construction and renovation projects for accessibility, including the Coordinator's involvement in this process.
4. PK has published an architectural accessibility declaration for the university's premises on its website ([www.pk.edu.pl](http://www.pk.edu.pl)). Accessibility declarations for individual buildings are prepared and updated by the building managers in consultation with the Accessibility Coordinator and the Accessibility Assurance Team.
5. The Coordinator, with the assistance of the Accessibility Assurance Team or other individuals and units designated by the Rector of PK, may establish a PK Architectural Accessibility Standard specifying additional requirements not listed in section 1. The PK Architectural Accessibility Standard is subject to approval by the Rector of PK.

**§ 5 Information and Communication Accessibility**

1. Minimum requirements for information and communication accessibility include:
	1. assisting individuals with specific needs through the use of communication support tools, including:
	a) email,
	b) text messaging, including SMS, MMS, or online messengers,
	c) audio-visual communication, including through online messengers,
	or by providing remote online access to a translator's services via websites and applications;
	2. installing devices or other technical solutions to assist individuals with hearing impairments, particularly induction loops, FM systems, or other technologies designed to enhance hearing;
	3. ensuring information about PK's activities is available on its website in the following formats: an electronic file containing machine-readable text, a recording of content in Polish Sign Language, information in an easy-to-read text format;
	4. ensuring, upon request by an individual with specific needs, communication with PK in the form specified in the request.
2. Responsibility for ensuring information and communication accessibility at Cracow University of Technology lies with:
	1. heads of organizational units responsible for communicating with individuals with specific needs using the support tools mentioned in point 1 of section 1;
	2. building managers for the installation of devices or technical solutions to assist individuals with hearing impairments;
	3. the Promotion Department for the main website ([www.pk.edu.pl](http://www.pk.edu.pl)) and heads of organizational units for their respective unit websites, to ensure information about PK’s activities is provided in the required formats;
	4. heads of relevant units for ensuring communication with PK in the form specified in a request submitted by an individual with specific needs.
3. The Coordinator, with the assistance of the Accessibility Assurance Team or other individuals and units designated by the Rector, may establish the PK Information and Communication Accessibility Standard, specifying additional requirements not mentioned in section 1. This standard is subject to approval by the Rector of PK.

**§ 6 Digital Accessibility**

1. Cracow University of Technology (PK) ensures digital accessibility by meeting the requirements specified in the attachment to the Digital Accessibility Act for its main website and other websites within the pk.edu.pl domain, as well as PK's mobile applications.
2. Responsibility for ensuring digital accessibility lies with:
	1. the Promotion Department – for ensuring accessibility of PK's main website ([www.pk.edu.pl](http://www.pk.edu.pl));
	2. the Organizational Department – for ensuring accessibility of PK's Public Information Bulletin;
	3. heads of organizational units – for ensuring accessibility of websites and mobile applications managed by their respective units.
3. When it is not possible to provide digital accessibility for a particular element of a website or mobile application, PK ensures an alternative means of access. This alternative access may include in particular:
	1. telephone communication,
	2. correspondence,
	3. electronic communication,
	4. or the assistance of a sign language interpreter or guide-interpreter.
4. Websites or mobile applications owned or operated by PK's organizational units must include a digital accessibility declaration. This declaration must contain:
	1. mandatory elements outlined in the Digital Accessibility Act;
	2. contact details for submitting feedback and requests;
	3. information on the architectural accessibility of PK buildings;
	4. information about the option to notify the public body of a lack of digital accessibility;
	5. a link to the website of the Commissioner for Human Rights.
5. A link to the digital accessibility declaration must be prominently displayed on all subpages of a website. In mobile applications, the declaration may be included as:
	1. a link to the full content on a dedicated application page, located in the application's help section, and
	2. in the application's description in the app store through which it is distributed.
	For offline applications, the entire accessibility declaration must be embedded within the application itself.
6. Responsibility for drafting and updating digital accessibility declarations lies with the entities listed in section 2. These entities prepare or update the declarations in consultation with the Coordinator.

### § 7 ****Report on the Status of Accessibility for People with Special Needs****

1. Cracow University of Technology (PK) prepares a **report every 4 years**, by **March 31st** of the respective year, on the status of ensuring accessibility for people with special needs at PK. This report is published in PK's Public Information Bulletin (BIP). The report is prepared using a form developed by the minister responsible for regional development.
2. The report includes information on how PK meets the **minimum requirements** outlined in Article 6 of the Act, as part of its activities, and provides details on any cases where alternative access was provided, along with an analysis justifying the failure to ensure accessibility for a person with special needs.
3. The report is prepared by the Coordinator with the assistance of the Accessibility Assurance Team and other individuals or units designated by the Rector at the Coordinator's request.

### § 8 ****Action Plan for Improving Accessibility****

1. The **Action Plan**, prepared by the Coordinator in collaboration with the Accessibility Assurance Team, is approved by the Rector.
2. The Coordinator prepares and coordinates the development and implementation of the Action Plan at PK, in accordance with the requirements specified in Article 6 of the Act. The Action Plan must include at least: set objectives, an assessment of the current state, a concept for actions within the adopted timeframes, along with sources of financing and monitoring principles for the effects of the implemented actions.
3. The Coordinator obtains the necessary data for preparing the Action Plan from PK's organizational units.
4. The Action Plan is an **evolutionary document**; work on the plan for the next time period should begin at least one year before the current plan expires.
5. The Action Plan is updated annually by **March 25th**, but it can also be updated more frequently as new needs are identified. Any changes must be approved by the Rector.
6. The implementation of the Action Plan is carried out in accordance with the competencies of the Coordinator and the Accessibility Assurance Team, as defined in § 3, paragraphs 5-8.

**§ 9 Information on the Lack or Limitation of Accessibility**

1. Every individual has the right to report to PK any information regarding the lack or limitation of accessibility.
2. PK employees are required to report to the Coordinator any significant irregularities related to the lack or limitation of accessibility, including any events or facts that may be important for ensuring equal opportunities for individuals with special needs.
3. Significant irregularities are considered to include, in particular:
	1. structural irregularities;
	2. those that could threaten health, life, safety, or public order;
	3. those requiring substantial organizational changes or significant expenditure;
	4. those requiring the involvement of multiple organizational units at PK;
	5. those negatively impacting the image of PK.
4. The report should be submitted in a documented form (written, electronic, etc.). A report mentioned in paragraph 1 can also be submitted orally.
5. The report, as mentioned in paragraph 1, should be submitted to the Coordinator.
6. The report does not need to contain a legal or factual justification for the submission.
7. The Coordinator responds to the report or directs it to the appropriate organizational unit or building manager.
8. The appropriate organizational unit or building manager resolves the matter of the report in consultation with the Coordinator, who ultimately approves the resolution. The resolution concerns, in particular, the validity of the report and, if applicable, the method and timeline for ensuring accessibility. In cases of significant irregularities, the deadline for ensuring accessibility is determined as immediate.
9. If the author of the report is not anonymous or has not requested anonymity, the Coordinator informs the author of the resolution.
10. If the decision acknowledges the validity of the submission, the relevant organizational unit or building manager ensures accessibility within the timeframe agreed upon in the decision.
11. The Office for People with Disabilities maintains a register of submissions regarding the lack or limitation of accessibility.

**§ 10 Request for Communication in the Desired Form**

1. A person with special needs may submit a request for communication in a specific form.
2. The request must be made in documentary form (written, electronic, etc.). The request may also be submitted orally, especially if the communication can be provided immediately.
3. The request can be submitted to the head of the organizational unit where communication is or will be conducted, or to the Coordinator.
4. The head of the unit ensures communication in the requested form, either immediately or in agreement with the Coordinator. In the case of immediate provision of communication in the requested form, the unit head informs the Coordinator about the method of ensuring communication.
5. The Office for People with Disabilities maintains a register of requests for communication in the desired form.

**§ 11 Request for Architectural or Informational-Communicational Accessibility**

1. A person with special needs or their legal representative may submit a request for the provision of accessibility in terms of architectural or informational-communicational accessibility.
2. The request must be made in documentary form (written, electronic, etc.).
3. The request can be submitted to the relevant organizational unit or the building manager to which the request pertains, or directly to the Coordinator. If the request is submitted to the organizational unit or building manager, it will be forwarded to the Coordinator.
4. The request for accessibility must include:
	1. contact details of the requesting person;
	2. the status of the person with special needs;
	3. the barrier hindering or preventing accessibility;
	4. the preferred way to ensure accessibility (optional);
	5. the preferred method of contact with the requesting person (e.g., text-only).
5. The Coordinator responds to the request or directs it to the relevant organizational unit or building manager.
6. The head of the organizational unit or the building manager considers the request in consultation with the Coordinator. The Coordinator for accessibility approves the decision on behalf of the Rector of PK.
7. The head of the organizational unit or the building manager ensures accessibility as specified in the request without unnecessary delay, but no later than 14 days from the submission of the request.
8. If it is not possible to provide accessibility as specified in the request within the time frame stated in section 7, the head of the relevant organizational unit or building manager must promptly inform the Coordinator, who will notify the requesting person of the reasons for the delay and provide a new deadline for ensuring accessibility. Indicating a deadline longer than 2 months from the date of submission of the request means the possibility of filing a complaint about the lack of accessibility.
9. In cases justified by exceptional circumstances, when ensuring accessibility in the manner specified in the request is impossible or significantly hindered, particularly for technical or legal reasons, the head of the organizational unit or building manager must promptly notify the Coordinator, who will inform the requesting person about the inability to ensure accessibility. This does not exempt PK from the obligation to provide alternative access.
10. In the notification referred to in section 9, the head of the organizational unit or building manager must justify their position, particularly specifying the circumstances preventing the provision of accessibility in the manner outlined in the request.
11. In the proceedings regarding the request for ensuring accessibility, the provisions of the Act of 14 June 1960 – the Code of Administrative Procedure, do not apply, except for provisions related to the exclusion of employees/authorities, delivery, the calculation of deadlines, supplementing formal deficiencies, and forwarding the request according to jurisdiction.
12. The Office for Persons with Disabilities keeps a register of requests for architectural or informational-communicational accessibility.

**§ 12 Request for Digital Accessibility**

1. Anyone, including a minor or their legal representative, may submit a request for the provision of accessibility or the application of alternative access – in the area of digital accessibility.
2. The request must be submitted in writing (in paper or electronic form, etc.).
3. The request can be submitted to the appropriate organizational unit responsible for the website/mobile application, as specified in § 6(2), or directly to the Coordinator. If the request is submitted to the organizational unit, it will be forwarded to the Coordinator.
4. The request for accessibility must include:
5. contact details of the requesting person;
6. identification of the website/mobile application whose accessibility is to be ensured;
7. preferred method of ensuring accessibility (optional);
8. identification of alternative access, if applicable;
9. method of contact with the requesting person (e.g., text-only).
10. The Coordinator responds to the request or directs it to the appropriate organizational unit.
11. The appropriate organizational unit considers the request in consultation with the Coordinator. The Coordinator approves the decision on behalf of the Rector of PK.
12. The appropriate organizational unit ensures accessibility as specified in the request without undue delay, no later than 7 days from the date the request was made.
13. If ensuring accessibility, as specified in the request, is not possible within the timeframe mentioned in the previous paragraph, the head of the appropriate organizational unit must promptly inform the Coordinator, who will notify the requester of the reasons for the delay and provide a new deadline for ensuring accessibility, no longer than 2 months from the date the request was made.
14. The provisions of paragraphs 6 and 7 shall apply accordingly to the use of alternative access.
15. The Office for People with Disabilities keeps a register of requests for the provision of digital accessibility.

**§ 13 Complaint about the lack of accessibility in terms of architectural or informational-communication accessibility**

1. If PK has not ensured accessibility in response to a request for accessibility:
	1. in the manner and within the time frame specified in § 11, paragraph 7, or
	2. within the time frame specified in § 11, paragraph 8, or
	3. for reasons stated in the notification referred to in § 11, paragraph 9,
	the applicant may file a complaint about the lack of accessibility with the Coordinator.
2. The Coordinator responds to the complaint or forwards it to the relevant organizational unit or the facility manager.
3. The facility manager subject to the complaint prepares a statement regarding the complaint in consultation with the Coordinator. The Coordinator approves the position on behalf of the Rector of PK and forwards it to the President of the Management Board of PFRON.
4. If PK is instructed by the President of the PFRON Management Board, via a decision, to ensure accessibility, the head of the relevant organizational unit or the facility manager, in consultation with the Coordinator, ensures accessibility according to the content of that decision.
5. The Office for People with Disabilities keeps a register of complaints regarding the lack of accessibility in terms of architectural or informational-communication accessibility.

**§ 14 Complaint regarding the provision of digital accessibility**

1. If PK has not ensured accessibility in response to a request for digital accessibility, or if the applicant refused to use alternative access, the applicant may file a complaint regarding the provision of digital accessibility with the Coordinator.
2. For complaints handled in proceedings related to the provision of digital accessibility, the provisions of Chapter VIII of the Act of 14 June 1960 – the Code of Administrative Procedure shall apply.
3. The Coordinator responds to the complaints or forwards them to the appropriate organizational unit or the website manager.
4. If PK receives information about a complaint, the organizational unit subject to the complaint prepares a statement regarding the complaint in consultation with the Coordinator. The Coordinator approves the position on behalf of the Rector of PK and forwards it to the applicant.
5. The Office for People with Disabilities keeps a register of complaints regarding the lack of digital accessibility.