



# Halton Regional Police Service

## Directive

**Issue Number:**  
**EXE-026**

<b>Directive Type:</b> <b>Executive</b>	<b>Subject:</b> <b>Accessibility for Ontarians with Disabilities Act</b>
<b>Replaces:</b> January 1, 2012	<b>Responsible Bureau:</b> Accessibility Coordinator
<b>Related Standards / Legislation / Directives:</b> Canadian Charter of Rights and Freedoms; Ontario Human Rights Code, Ontario Building Code; Accessibility for Ontarians with Disabilities Act; Integrated Accessibility Standards O. Reg. 191/11; Workplace Safety and Insurance Act; Dog Owners Liability Act; Blind Persons Rights' Act Directives: EXE-001, HRS-023, TRN-005	
<b>Approved By:</b>	<b>Effective Date:</b> September 29, 2017

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## **A** Policy

1. The Halton Regional Police Service is committed to meeting the accessibility needs of persons with disabilities with respect to the Service's goods, services and facilities, in a timely manner.
2. Further, it is the policy of the Service to meet the objectives and requirements of **O. Regulation 191/11 Integrated Accessibility Standard (IASR)** made under the **Accessibility for Ontarians Act, 2005 (AODA)**.

## **B** Definitions

1. For the purposes of this directive, the following definitions will apply:
  - (a) **Accessibility Coordinator** – a civilian member of the Service designated to ensure the HRPS is compliant with the requirements of the **Accessibility for Ontarians with Disabilities Act 2005** and facilitate the feedback process;
  - (b) **Assistive Device** - a technical aid, communication device, or medical aid modified or customized, that is used to increase, maintain, or improve the functional abilities of people with disabilities;
  - (c) **Barrier** - anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, or a policy or a practice;
  - (d) **Communication Supports** - may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communication;
  - (e) **Customer** – includes all persons wishing to access the goods, services and facilities of the Halton Regional Police Service;
  - (f) **Disability** – an inability to perform some or all of the tasks of daily life due to:
    - (i) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes: diabetes mellitus; epilepsy; a brain injury; any degree of paralysis; amputation; lack of physical coordination; blindness or visual impediment; deafness or hearing impediment; muteness or speech impediment; physical reliance on a service animal or on a wheelchair or other remedial appliance or device;
    - (ii) a condition of mental impairment or a developmental disability;

- (iii) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
  - (iv) a mental disorder; or
  - (v) an injury or disability for which benefits were claimed or received under the insurance plan established under the ***Workplace Safety and Insurance Act, 1997***;
- (g) **Service Animal** – an animal utilized by a person with a disability, where it is readily apparent that the animal is assisting the person to function and may include but is not limited to: guide, hearing or therapy dogs, or if the person provides a letter from a regulated health professional (e.g. doctor, audiologist, psychologist etc.) confirming that the person requires the animal for reasons relating to the disability;
- (h) **Support Person** – a person who accompanies a person with a disability to help with communication, mobility, personal care, medical needs, or with access to goods, services or facilities;
- (i) **Temporary Disruption** – a temporary planned or unexpected disruption to facilities or services that people with disabilities usually use to access goods and services;
- (j) **Third Parties** – refers to other businesses or organizations that are customers of the Service and includes consultants, manufacturers and wholesalers as well as providers of other business and professional services;
- (k) **Workplace Emergency Response Information** – developing, preparing, planning and providing information for the purpose of responding to and recovering from an emergency in the workplace.

## **C General**

1. The ***Accessibility for Ontarians with Disabilities Act, 2005*** is a provincial law. Its goal is to make Ontario accessible for people with disabilities by 2025 by developing and enforcing accessibility standards.
2. The accessibility standards are the legal requirements that organizations in Ontario must follow to become more accessible to people with disabilities. The standards form part of the ***IASR***. The ***IASR*** includes accessibility requirements in the following areas:
  - (a) customer service;
  - (b) information and communications;

- (c) employment;
  - (d) transportation;
  - (e) design of public spaces.
3. The Halton Regional Police Service aims to ensure that persons with disabilities are given equal opportunity to obtain, use and benefit from Service goods, services or facilities.
  4. The Service will make reasonable efforts to ensure that:
    - (a) goods or services are provided in a manner that respects the dignity and independence of persons with disabilities;
    - (b) the goods or services provided to persons with disabilities are integrated with the provision of goods or services to others unless an alternate measure is necessary to allow a person with a disability to benefit from the goods or services. The alternate measure may be temporary or permanent;
    - (c) communications with a person with a disability are conducted in a manner that takes the person's disability into account;
    - (d) people with disabilities may use assistive devices, service animals and support persons as is necessary to access Service goods, services or facilities.
  5. The Service will provide training to employees, volunteers, consultants, and contractors who provide goods or services on behalf of the Service to persons with disabilities.
  6. This policy will be made available upon request and in an accessible format or with communication supports in a timely manner.

## **D Support Persons**

1. Persons with disabilities are permitted to be accompanied by their support person in areas or premises that are open to the public, when accessing the Service's goods, services or facilities. Members shall ensure that both persons are permitted to enter the premises and that the person with the disability is not prevented from having access to the support person while on the premises.
2. The Service may deem it necessary to require a support person for a person with a disability to access HRPS goods or services. This will only occur after consultation with the person with a disability and when all reasonable accommodation options have been considered.

3. Members shall direct all communication to the person with the disability directly and not the support person unless otherwise directed to do so.
4. Members shall ensure they obtain the consent of the person with a disability prior to releasing confidential information or requesting confidential information while a support person is present.
5. A person with a disability in custody may be provided access to their support person when required for communication, mobility, personal or medical needs subject to the discretion of the on duty staff sergeant.

## **E Assistive Devices**

1. Persons with disabilities may use assistive devices as required when accessing the goods, services or facilities provided by HRPS unless otherwise prohibited by law.
2. It is the responsibility of persons with disabilities to ensure that their assistive devices are operated in a safe and controlled manner.
3. Members shall ask permission before touching a wheelchair or other mobility device as they are part of the user's personal space (unless the person is in custody).
4. Where a person with a disability is unable to access the services of the Service through the use of their own personal assistive device, members shall work with the individual to determine an alternate means. If unable to resolve the issue the member shall notify the AODA Coordinator.
5. The AODA Coordinator shall:
  - (a) determine if the service is inaccessible based on the individual's requirements;
  - (b) assess service delivery and potential service options to meet the needs of the individual; and
  - (c) notify the person with the disability of the alternative service and how they can access the service.
6. A person with a disability in police custody or being detained who is in possession of an assistive device shall be assessed by the on duty staff sergeant and a determination shall be made as to what, if any, such devices or aids may be maintained by the person.

## **F Service Animals**

1. Persons with disabilities are permitted to be accompanied by their service animal and keep the animal with them in areas that are open to the public, when accessing the Service's goods, services or facilities, unless otherwise prohibited by law.
2. In the event that a service animal is prohibited from a HRPS facility, members shall extend reasonable efforts to ensure that other measures are available to enable the person with a disability to obtain, use or benefit from the Service's goods, services or facilities.
3. If a service animal is not readily identified as one that is used by the person for reasons relating to their disability as a result of visual indicators such as the vest or harness worn by the animal, request the person with a disability to provide documentation from a regulated health professional confirming the person requires the animal for reasons relating to the disability (**see Appendix #1 for a list of Regulated Health Professionals**).
4. Service animals must be supervised by their owners and kept in control when used to access HRPS goods, services or facilities.
5. Members should not touch, feed or speak to a service animal without the permission of the owner (unless the person is in custody).
6. Where a service animal causes disruption or becomes a nuisance and the owner is unable to correct the behaviour, the owner shall be asked to remove the animal from the facility. An alternate means to provide service to the person shall be arranged.
7. A person with a disability being escorted by a member within secured areas of police facilities may be allowed to keep their service animal with them provided there are no public safety concerns.
8. Where the service animal is denied access to secure areas, consideration shall be given to alternate accommodations including, but not limited to:
  - (a) utilizing an alternate meeting format such as a teleconference;
  - (b) service delivery at an alternate time and location;
  - (c) any other assistive measures available to deliver services to ensure equality of outcome.
9. A person with a disability in police custody or being detained who requires a service animal shall be assessed by the on duty staff sergeant and a determination shall be made whether or not the animal can remain with the person.

10. Where it is determined by the on duty staff sergeant that a person with a disability in custody may be permitted to keep their service animal with them, the on duty staff sergeant shall ensure the appropriate arrangements are made to provide care to the animal.
11. Where it is determined by the on duty staff sergeant that the service animal may not stay with the person in custody, the on duty staff sergeant shall ascertain from the person with a disability the identity of a suitable caregiver for the animal.
12. Where no caregiver is available, the on duty staff sergeant shall ensure the appropriate arrangements are made with the local municipal Animal Control Shelter or Humane Society to retrieve and care for the animal.

## **G Service Disruptions**

1. In the event of a planned service disruption to goods, services or facilities that are relied upon by people with disabilities to access HRPS goods, services or facilities, notice of the disruption shall be provided in advance.
2. The notice will include information about the reason for the disruption, the anticipated duration and a description of alternative facilities and services that may be available.
3. Notice may be given by posting the information in a conspicuous place at Headquarters and/or any of the Districts affected, or posted on the HRPS website or by such other method as is reasonable under the circumstances.
4. In the event of an unexpected disruption, notice will be provided as soon as possible and will include the information outlined above.

## **H Training**

1. All employees and volunteers will be trained on accessible customer service (paid, and unpaid, full-time, part-time and contract persons).
2. Training for anyone who provides goods, services or facilities to customers on the Service's behalf (e.g. Halton Accident Support Services Ltd.) shall be addressed through the Service's procurement process.
3. Training will be completed as soon as possible after an employee or volunteer joins the HRPS.
4. Training will be provided when there are changes to this policy.
5. The training for all employees and volunteers will include the following topics:

- (a) the purpose of the **AODA** and the requirements of the Regulation;
  - (b) the **Ontario Human Rights Code** as it pertains to people with disabilities;
  - (c) the requirements of accessibility standards set out in the **IASR**;
  - (d) how to interact and communicate with people with various types of disabilities;
  - (e) how to interact and communicate with people with disabilities who use an assistive device or require the assistance of a service animal or support person;
  - (f) what to do if a person with a disability is having difficulty accessing the Service's goods, services or facilities;
  - (g) how to use the equipment or assistive devices available on HRPS premises;
  - (h) HRPS customer service policies, practices and procedures governing the provision of goods or services to people with disabilities.
6. The Training Bureau shall keep records of the training provided, including the dates on which the training occurred for each member (**ref. TRN-005 Skills Development and Learning Plan**).

## **I Accessible Formats and Communication Supports**

1. The Service will:
  - (a) upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs and at a cost that is no more than the regular cost charged to other persons;
  - (b) notify the public about the availability of accessible formats and communication supports;
  - (c) consult with the person making the request in determining the suitability of an accessible format or communication support.

**Note:** The requirements in this section do not apply to products, product labels, unconvertible information or communications, or information that the Service does not control directly or indirectly through a contractual relationship.

2. If the Service determines that information or communications are unconvertible, an explanation as to why the material is unconvertible and a summary of the unconvertible information will be provided to the person making the request by the AODA Coordinator.

**J Emergency Procedures, Plans or Public Safety Information**

1. Emergency procedures, plans or public safety information, that are publicly available, shall be provided in an accessible format or with appropriate communication supports, upon request, as soon as practicable.

**K Feedback Process**

1. Pursuant to **Section 80.50(1)(a)** of the **Regulation**, the Service has established a feedback process for receiving and responding to members of the public who wish to comment on the provision of goods, services or facilities to people with disabilities by the HRPS.
2. HRPS customers should be encouraged to make comments regarding the provision of goods, services or facilities to people with disabilities, in person, by telephone or TTY, in writing, by e-mail, or otherwise. Customers may contact the Service at the following website: [www.haltonpolice.ca](http://www.haltonpolice.ca) or by phone 905-825-4777 ext. 5999.
3. Accessible formats and communication supports are available upon request.
4. All comments shall be reviewed by the AODA Coordinator and customers can anticipate a response within five business days.

**L Accessibility Plans and Annual Progress Reports**

1. The Halton Regional Police Service has developed a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet requirements under the **IASR**. The multi-year accessibility plan is:
  - (a) posted on the Service's website and is provided in an accessible format, upon request; and
  - (b) will be reviewed and updated at least once every five years.
2. The AODA Coordinator shall file an accessibility report with a director, as appointed by the Ministry of Community and Social Services, annually or at such other times as the director may specify (**s. 14. (1) AODA**).
3. The AODA Coordinator will make an accessibility report available to the public (**s. 14. (2) AODA**).
4. When requested, a copy of this policy and the Accessible Customer Service Plan will be provided to any person upon request and in a format that takes into account the requester's disability.

5. This policy will be reviewed and/or amended when additional accessibility related regulations are enacted by the Government of Ontario, or as per **EXE-001 Policy Directives System**.
6. The Chief of Police shall ensure that the accessibility report as prescribed by and reported to the Minister of Community and Social Services is filed with the Board.

## **M Accessible Employment HRPS Members**

1. The requirements set out in this section apply only to employees of the Halton Regional Police Service and applicants for employment with the Halton Regional Police Service. They do not apply to volunteers or other non-paid individuals.
2. In regards to recruitment, the Service shall:
  - (a) notify its employees and the public about the availability of accommodation for applicants with disabilities in recruitment processes;
  - (b) notify job applicants when they are selected to participate in an assessment or selection process that accommodations are available, in relation to the materials or processes to be used;
  - (c) consult with a selected applicant who has requested accommodation to provide or arrange for the provision of suitable accommodation that takes into account the applicant's accessibility needs;
  - (d) notify the successful applicant of its policies for accommodating employees with disabilities.
3. In regards to informing members of supports, the Service shall:
  - (a) inform members of the policies used to support members with disabilities including those on the provision of work accommodation that take into account a member's accessibility needs;
  - (b) provide this information to new members as soon as practicable after they begin their employment with the Service. Updated information will be provided to members whenever there is a change to existing policies on the provision of work accommodation.
4. In regards to accessible formats and communication supports for members, the Service will consult with the member to provide or arrange for the provision of accessible formats and communication supports for:
  - (a) information needed to perform the member's job; and
  - (b) information generally available to employees in the workplace.

5. In regards to workplace emergency response information, the Service will:
  - (a) provide individualized workplace emergency response information to members who have a disability, if the disability is such that the individualized information is necessary and the Service has been made aware of the need for accommodation due to the employee's disability;
  - (b) review the information when a member moves to a different location in the organization, when the member's overall accommodation needs or plans are reviewed and when the Service reviews its general emergency response policies.
  
6. In regards to documented individual accommodation plans, the AODA Coordinator will in collaboration with Region of Halton Employee Health, Safety and Wellness Team (EHSWT):
  - (a) establish a written process for the development of documented individual accommodation plans for members with disabilities. The process includes the elements identified in **section 28 (2)** of the *IASR*;
  - (b) if requested by a member, develop an individual accommodation plan that includes information regarding accessible formats and communication supports, individualized workplace emergency response information and identify any other accommodation that is to be provided.
  
7. In regards to the return to work process, the Service has developed a process for members outlined in **HRS-023 Disability Management**.

## **N**    **Forms**

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| 1. | Feedback Form<br>Accessible Customer Service | EXE-026A | (electronic) |
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## **Appendix #1**

### Regulated Health Professionals

For the purposes of this policy, a Regulated Health Professional is:

- 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