



Halton Regional Police Service

Policy Directive

Issue Number:

HRS-037

Subject:

Accessibility for Ontarians with Disabilities Act

Responsible Bureau:

Director – Human Resource Services

Approved by:

Related Standards / Legislation / Directives:

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; Accessibility Training Module; Provincial Animal Welfare Services Act; **Community Safety and Policing Act O. Reg 401/23**
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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. Reg. 191/11 Integrated Accessibility Standard (IASR)** made under the **Accessibility for Ontarians Act, 2005 (AODA)**.

B Definitions

1. For the purposes of this policy 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) **American Sign Language (ASL)** – a visual language with its own grammar and syntax, distinct from English, used by Deaf people primarily in Canada and the United States. Meaning is conveyed through signs that are comprised of specific movements and shapes of the hand and arms, eyes, face, head and body posture. In Canada, there are two (2) main sign languages: ASL and la langue des signes québécoise (LSQ);
 - (c) **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;
 - (d) **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;
 - (e) **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;
 - (f) **Customer** – includes all persons wishing to access the goods, services and facilities of the HRPS;
 - (g) **Deaf** – a term generally used to describe individuals with a severe to profound hearing loss, with little or no residual hearing. Some deaf people use a spoken language and speechreading, combined with their residual hearing and hearing aids, communication devices, and/or cochlear implants to communicate. Others

use a signed language, such as American Sign Language (ASL) or la langue des signes québécoise (LSQ);

- (h) **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 (1) 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***;
- (i) **Service Animal** – an animal required by a person with a disability for assistance, and the person has documentation from a regulated health professional confirming that the person requires the animal for reasons related to their disability (see **Appendix 2**) (ref. ***Provincial Animal Welfare Services Act***);
- (j) **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;
- (k) **Temporary Disruption** – a temporary planned or unexpected disruption to facilities or services that people with disabilities usually use to access goods and services;
- (l) **Third Parties** – 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;
- (m) **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 ***Integrated Accessibility Standards (IASR)***. The ***IASR*** includes accessibility requirements in the following areas:
 - (a) customer service;
 - (b) information and communication;
 - (c) employment;
 - (d) transportation; and
 - (e) design of public spaces.
3. The HRPS 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; and
 - (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 ensure training is provided to all members and volunteers.
6. Training is a requirement for any consultants and contractors who provide goods or services on behalf of the Service to persons with disabilities. This training is the responsibility of the consultant and contractors. The consultants and contractors must maintain accurate records of all training delivered and provide them to the Service upon request (**see section H Training** of this directive).

7. Members planning events on behalf of the Service should give consideration to ensuring the event is inclusive and accessible. The **Accessible Event Planning Checklist HRS-037D** may assist in identifying any barriers so that they can be addressed before the event begins.
8. Information regarding language and ASL interpreters can be found in **COM-009 Interpreters**.
9. This policy directive will be made available upon request and in an accessible format or with communication supports in a timely manner (**see section I** of this directive).

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 accessibility coordinator.
5. The accessibility 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;
 - (c) notify the person with the disability of the alternative service and how they can access the service; and
 - (d) provide support to the Equity, Diversity and Inclusion program (ref. CPS-004 Equity, Diversity and Inclusion).
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), members may request the person with a disability 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; and
 - (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.
13. Without the explicit consent of the chief of police, members are prohibited from bringing to work:
 - (a) emotional support animals;
 - (b) guide dogs/service animals in training; or
 - (c) unconfirmed service animals.

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 by the manager of the unit responsible for the disruption.
2. The notice shall include information about the reason for the disruption, the anticipated duration and a description of alternative facilities and services that may be available.
3. The manager may give notice 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 by the unit manager and will include the information outlined above.
5. The manager may at any time contact the accessibility coordinator for assistance with this process.

H Training

1. All members and volunteers will be trained on accessible customer service (paid, and unpaid, full-time, part-time and contract persons). For quick reference, the Accessibility Training Module is available on SharePoint.
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 a member or volunteer joins the HRPS.
4. Training will be provided when there are changes to this policy directive.
5. The training for all members 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; and
 - (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 **Training, Skills Development and Learning Plan**).

I Accessible Formats and Communication Supports

1. Accessible formats and communication support providers are outlined in **Appendix 2**.
2. In compliance with **section 12** of the **IASR**, members of 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; and
 - (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.

3. Accessible formats can include, but are not limited to, the following:
 - (a) large text;
 - (b) text saved as an accessible Word document;
 - (c) braille; and
 - (d) recorded audio.

4. Common communication supports that people with disabilities may require can include, but are not limited to, the following:
 - (a) American Sign Language interpretation;
 - (b) real-time captioning; and
 - (c) verbal plain language explanation of a written document.
5. If at any time a member is unsure how to proceed they can contact the accessibility coordinator.
6. If the accessibility coordinator 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.

J Emergency Procedures, Plans or Public Safety Information

1. Emergency procedures, plans or public safety information that is publicly available shall be provided by the accessibility coordinator 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 by members to make comments regarding the provision of goods, services or facilities to people with disabilities, in person, by telephone or TTY, in writing, by email, or otherwise, utilizing **Accessible Customer Service Feedback HRS-037A** which is accessible via the Service's external website. Customers may contact the Accessibility Coordinator:
 - (a) at the following website www.haltonpolice.ca
 - (b) by phone **905-825-4777**; or
 - (c) by mail to: Attention: Accessibility Coordinator, Halton Regional Police Service
2485 North Service Road West, Oakville, Ontario, L6M 3H8.
3. Accessible formats and communication support will be made available upon request (**see Appendix 2**).

4. All comments shall be reviewed by the accessibility coordinator and customers can anticipate a response within five (5) business days.

L Customer Service

1. The Service strives at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities. All members and volunteers, as well as, everyone who provides goods or services on behalf of the organization, regardless of whether or not they interact with the public, shall receive training on providing customer service to persons with disabilities.

M Accessibility Plans

1. The HRPS 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 (5) years.
2. When requested, a copy of this policy directive **and related plans or training** will be provided to any person upon request and in a format that takes into account the requester's disability.
3. This policy directive will be reviewed and/or amended when additional accessibility related regulations are enacted by the Government of Ontario, or as per **SMO-001 Policy Directives System**.

N Accessible Employment HRPS Members

1. The requirements set out in this section apply only to members of the HRPS and applicants for employment with the Service. They do not apply to volunteers or other non-paid individuals.
2. In regards to recruitment, the Service shall:
 - (a) notify its members 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; and
 - (d) notify the successful applicant of its policies for accommodating members 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; and
 - (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 members in the workplace.
- 5. In regards to workplace emergency response information, the accessibility coordinator will:
 - (a) complete an **Individualized Emergency Response Worksheet HRS-037B** with members who have a disability, in order to complete an **Individualized Emergency Response Plan HRS-037C**; and
 - (b) review the **Individualized Emergency Response Plan** when a member moves to a different location in the organization or when the member's overall accommodation needs change.
- 6. The accessibility coordinator will provide a copy of the **Individualized Emergency Response Plan** to the member's supervisor and designated support person.
- 7. The accessibility coordinator will keep copies of the **Individualized Emergency Response Worksheet** and **Individualized Emergency Response Plan** in accordance with the **Records Retention Schedule (ref. REC-012)**.
- 8. When requested by a member with a disability, the Manager – Human Resource Services in collaboration with the accessibility coordinator (as required) will:

- (a) develop an individual accommodation plan that includes the elements identified in **section 28 (2)** of the **IASR**; and
- (b) develop an individual accommodation plan that includes information regarding accessible formats and communication supports, and identify any other accommodation that is to be provided as outlined in **HRS-023 Disability Management**.

O Forms

1.	Feedback Form Accessible Customer Service	HRS-037A	(SharePoint)
2.	Individualized Emergency Response Worksheet	HRS-037B	(SharePoint)
3.	Individualized Emergency Response Plan	HRS-037C	(SharePoint)
4.	Accessible Event Planning Checklist	HRS-037D	(SharePoint)

Appendix 1:

Regulated Health Professionals

For the purposes of this policy directive, 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

Appendix 2

Accessible Formats and Communication Supports Providers

Braille Service Providers	Canadian Braille Press www.canadianbraillepress.com 1-888-236-0826 or 1-613-274-7856 T-Base Communications www.tbase.com 1-800-563-0668 Accessible Printing Inc. www.accessibleprinting.com 416- 414-3119 or 1-877-389-2253 Crawford Technologies www.crawford.com 1-866-679-0864 or 416-923-0080
American Sign Language Interpretation	Canadian Hearing Society www.chs.ca 1-855-656-3748
Real-Time Captioning	Neeson & Associates - Court Reporting and Captioning www.neesonreporting.com 416-413-7755 1-888-525-6666 Canadian Hearing Society www.chs.ca 1-855-656-3748