

Policy Number: GA-14 & CR-14	Policy Subject: ACCESSIBILITY POLICY (Previously Accessibility Standards for Customer Service policy – replaces GA-14 and former CR-14)
LEGISLATIVE AUTHORITIES	<ul style="list-style-type: none"> ▪ <i>Accessibility for Ontarians with Disabilities Act, 2005</i>, S.O. 2005, c. 11 ▪ Accessibility Standards for Customer Service, O Reg. 429/07 ▪ Integrated Accessibility Standards, Ontario Regulation 191/11 ▪ Ontario <i>Human Rights Code</i>, R.S.O. 1990, c. H. 19 ▪ Ontario <i>Police Services Act</i>, R.S.O. 1990, section 31 (1)(c)
DATE APPROVED	19 December 2011 (Accessibility Standards for Customer Service Policy)
DATE REVIEWED	2013, 2014
DATE AMENDED	28 July 2014
DATE TO BE REVIEWED	2015
REPORTING REQUIREMENTS	<ol style="list-style-type: none"> 1. On progress in meeting the multi-year Accessibility Plan: annually to the Board. 2. On Compliance: every three years to the Provincial Director, with the first report due as of 31 December 2014. This report also to be submitted to the Board.

LEGISLATIVE AUTHORITIES

- The *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) was enacted into law by the Provincial Government in 2005 to ensure the development, implementation and enforcement of accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.
- The Accessibility Standards for Customer Service Regulation 429/07 (ASCS) became law on January 1, 2008 and was the first of five sets of standards to be issued by the Provincial Government in support of the AODA. The Regulation establishes accessibility standards for customer service and applies to every designated public sector organization, and to every other person or organization that has at least one employee in Ontario and that provides goods or services to members of the public or other third parties.

- The Integrated Accessibility Standards Regulation 191/11 (IASR) was enacted in 2011 and is a consolidation of accessibility standards in the following five areas: General; Information and Communications; Employment; Transportation; Design of Public Spaces (Accessibility for the Built Environment).
- Section 1 of the Ontario *Human Rights Code*, R.S.O. 1990, c. H. 19 states that, “Every person has a right to equal treatment with respect to services, goods and facilities, without discrimination because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, age, marital status, family status or disability.”
- Under Section 31(1)(c) of the *Police Services Act* the Board is responsible for the provision of adequate and effective police services in the municipality and shall establish policies for the effective management of the police force. This policy addresses the provision of services to persons with disabilities by the Ottawa Police Service.

BOARD POLICY

POLICY STATEMENT

The Ottawa Police Services Board is committed to meeting the accessibility needs of people with disabilities in a timely and proactive manner and will use reasonable effort to provide equitable access to programs, services, goods and facilities provided by the Board and the Ottawa Police Service, in a way that respects a person’s dignity and independence

Policy requirements set out in this document shall form part of the Police Services Board’s Policy Manual and the Chief of Police shall comply with these requirements in directing the Ottawa Police Service.

PURPOSE

This policy is intended to provide the overarching framework to guide the review and development of other Ottawa Police Services and Board policies, standards, procedures and guidelines to comply with the standards developed under the *Accessibility for Ontarians with Disabilities Act 2005*, S.O. 2005, c. 11 (the AODA).

APPLICATION

This policy applies to the members and employees of the Ottawa Police Services Board (the Board) and to all employees of the Ottawa Police Service (OPS), auxiliary members, volunteers, and to any individual or organization that provides goods, services or facilities to the public or other third parties on behalf of the OPS or Board, in accordance with the legislation.

PRINCIPLES

OPS and Board services, programs, goods and facilities are to be available to people with disabilities in a manner that:

- Is free from discrimination
- Offers accessible formats and communications supports
- Seeks to provide integrated services
- Provides an opportunity equitable to others to obtain, use and benefit from the goods or services
- Takes into consideration a person's disability.

DEFINITIONS

For the purposes of this policy, the following definitions shall apply:

Accessible Formats – may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities, provided for any information and communication that the OPS and Board makes available to the public.

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 communications.

Disability – is defined as prescribed in section 2 of the *Accessibility for Ontarians with Disabilities Act, 2005*, S.O. 2005, c. 11 and the *Human Rights Code*, R.S.O. 1990, c. H. 19, as follows:

- a) 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 co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Kiosk – an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products, or both.

Service Animals - are defined as prescribed in section 4(9) of the Accessibility Standards for Customer Service, O. Reg. 429/07, as follows: “An animal is a service animal for a person with a disability if:

- It is readily apparent that the animal is used by the person for reasons relating to his or her disability, or
- If the person provides a letter from a physician or nurse confirming that that person requires the animal for reasons relating to the disability.

Support Person – is defined as prescribed in section 4(8) of the Accessibility Standards for Customer Service, O. Reg. 429/07, as follows: “A support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.”

Unconvertible – information or communications are unconvertible if it is not technically feasible to convert the information or communications or the technology to convert the information or communications is not readily available.

POLICY REQUIREMENTS

Policy Obligations

The Ottawa Police Service is a “large organization” under the AODA. The Board and the OPS are committed to meeting the accessibility needs of people with disabilities.

Board

It is the policy of the Ottawa Police Services Board that it:

- Meets all requirements of the ASCS, O. Reg. 429/07 under the AODA on an ongoing basis.
- Meets all requirements of the IASR, O. Reg. 191/11 under the AODA on an ongoing basis in accordance with the timelines set out in the regulation.
- Has policies, practices and procedures that are aligned with the requirements of the IASR, O. Reg. 191/11 under the AODA.
- Includes accessibility requirements related to the implementation of this policy as part of its annual budget and planning processes.

Chief

It is the policy of the Ottawa Police Services Board that the Chief of Police shall ensure that the OPS:

- Meets all requirements of the ASCS, O. Reg. 429/07 under the AODA on an ongoing basis.

- Meets all requirements of the IASR, O. Reg. 191/11 under the AODA on an ongoing basis in accordance with the timelines set out in the regulation.
- Has policies, practices and procedures that are aligned with the requirements of the IASR, O. Reg. 191/11 under the AODA.
- Includes accessibility requirements related to the implementation of this policy as part of the annual budget and planning processes.

Specifically, the Chief of Police shall ensure that there are procedures and practices in place that incorporate the principles and provisions set out below, and shall ensure that they are adhered to. Where references are made to the Board's responsibilities, it is understood that responsibility rests with the Board and not the Chief for ensuring policies, procedures and practices are in place and complied with.

A. GENERAL STANDARDS

1. Accessibility Plan and Policies

The Chief of Police shall produce a multi-year Accessibility Plan for the Police Service. The Plan will be posted on the OPS website and shall be made available in an accessible format and with communications supports, upon request. Progress on the Plan will be provided annually to the Board. The Accessibility Plan shall be reviewed and, if necessary, updated at least once every five (5) years.

Policies governing how the Board and OPS shall meet its requirements under the AODA will be provided in an accessible format, upon request.

2. Accessible Formats and Communications Supports

Except as otherwise provided by the AODA, the OPS and Board shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communications supports for persons with disabilities. Accessible formats and communication supports shall be provided in a timely manner, taking into account the person's accessibility needs and at a cost that is no more than the regular cost charged to other persons, in accordance with the Accessible Formats and Communication Supports Procedures of the City of Ottawa.

This does not apply to products and product labels, unconvertible information or communications and information that the Board or OPS does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, the Board/OPS shall provide the person requesting the information or communication with:

- a. An explanation as to why the information or communications are unconvertible.

b. A summary of the unconvertible information or communications.

3. **Kiosks**

When designing, procuring or acquiring self-service kiosks, the Board and OPS shall incorporate accessibility features, unless it is not feasible (or practicable). If not practicable, the Board or OPS, as the case may be, shall provide an explanation, upon request.

4. **Training**

Board members and employees, all OPS employees, volunteers, and all other people who provide goods, services or facilities on behalf of the Board or OPS, as well as those who develop policies, practices and procedures will receive accessibility training.

This training shall include:

1. A review of the purposes of the AODA and the requirements of the Accessibility Standards for Customer Service (Ontario Regulation 429/07) and instruction about the following matters:
 - How to interact and communicate with persons with various types of disability.
 - How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
 - How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability.
 - What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.

2. A review of the requirements of the Accessibility Standards referred to in the AODA Integrated Accessibility Standards (Ontario Regulation 191/11) and on the *Human Rights Code* as it pertains to persons with disabilities.
 - Training must be provided to:
 - All employees, and volunteers
 - All people who participate in developing the organization's policies, and
 - All other people who provide goods, services or facilities on behalf of the organization.
 - Every person must be trained as soon as practicable.
 - Organizations must provide training on any changes to its accessibility policies on an ongoing basis.

The training provided shall be appropriate to the duties of the employee, volunteer or third party. Training shall take place as soon as is practicable and upon completion, the Board or OPS, as the case may be, shall keep a record of the training provided including the dates on which accessibility training took place.

5. **Feedback**

Feedback on how services were delivered to people with disabilities shall be invited, forwarded to the appropriate personnel, responded to, documented and tracked. Feedback shall be collected by phone at the OPS, the Board or through the City of Ottawa 3-1-1 and Next Talk TTY (teletypewriter); by email to the OPS, Board; and in person at any of the OPS' police stations or the Board office. Feedback shall be accepted in accessible formats and with other communication supports as required.

6. **Documentation**

Documentation that describes this Policy and each of its requirements and any information and communication that the OPS and Board provides to the public shall be maintained on the OPS and Board websites respectively, and shall be provided to individuals, upon request, in the appropriate format or communication support in a timely manner and at a cost that is no more than the regular cost charged.

B. CUSTOMER SERVICE STANDARDS

1. **Assistive Devices**

The Board and Ottawa Police Service employees, auxiliary members, volunteers and third party contractors shall accommodate the use of personal assistive devices such as scooters and Braille display boards. Assistive devices that are available for access to specific services and programs shall be kept in good working order and the public shall be informed of their availability. Assistive devices include, but are not limited to, Assistive Listening Devices and FM Loop systems.

2. **Service Animals**

The Board and Ottawa Police Service employees, auxiliary members, volunteers and third party contractors shall accommodate the use of service animals by people with disabilities who are accessing OPS services or goods unless the animal is otherwise excluded by law, such as food preparation areas as prohibited by Food Premises, R.R.O. 1990, Reg. 562 under the *Health Protection and Promotion Act*, R.S.O. 1990, c. H.7.

3. **Support Persons**

Where a person with a disability accessing Board or OPS goods or services is accompanied by a support person, Board and OPS employees, auxiliary members, volunteers and third party contractors shall ensure that both persons are permitted to enter the premises together and shall ensure that the person with a disability can access the support person while on the premises.

4. **Admission Fees**

If the Board or OPS charges an admission fee in connection with a support person's presence at an event or function, the Board or OPS shall ensure that notice is given in advance about the amount, if any, that is payable in respect of the support person accompanying a person with a disability.

5. **Communications**

1. When communicating with a person with a disability, Board and OPS employees, auxiliary members, volunteers and third party contractors shall do so in a manner that respects the person's disability.
2. Publications printed by the Board and the OPS shall be made available in alternate formats, upon request by people with disabilities.

6. **Notice of Service Disruption**

In the event that there is a temporary disruption in the availability of facilities, services or goods used by persons with disabilities (e.g. temporary loss of elevator service), the Board or OPS shall give notice to the public of the reason for the disruption, the date(s) of disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available. Such notice may be provided by a variety of methods depending on the circumstances, and may include postings in conspicuous places at the affected premises, other facilities, and on the Board or OPS website, to ensure that the notice reaches those persons potentially affected by the temporary disruption.

C. INFORMATION AND COMMUNICATION SUPPORT STANDARDS

1. Communication

When communicating with a person with a disability, Board and OPS employees, volunteers and third party contractors shall do so in a manner that takes into account the person's disability. Guidelines for communicating with people who have various types of disabilities are provided in Appendix B of the City of Ottawa's Accessible Formats and Communication Supports Procedures.

2. Terminology

When referring to people with disabilities, Board and OPS employees, volunteers and third party contractors shall use terminology that adheres to guidelines provided in the City of Ottawa's Accessibility Training for Customer Service – Reference Guide (2009).

3. Accessible Websites and Web Content

Internet websites and web content controlled directly by the Board or the OPS, or through a contractual relationship that allows for modification of the product, shall conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at level A and AA in accordance with the schedule set out in the AODA Integrated Accessibility Standards.

4. Emergency Procedures, Plans and Information

The OPS shall provide all existing public emergency procedures, plans and public safety information upon request in an accessible format or with appropriate communication supports in a timely manner.

D. EMPLOYMENT STANDARDS

It is understood that, while the Employment Standards reference only the OPS, they apply equally to the Board. The Board will utilize and adhere to the City of Ottawa's policies and procedures in fulfilling the obligations of this Section.

1. Recruitment

The OPS shall post information about the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available upon request. The OPS shall consult with any applicant who requests an accommodation in a manner that takes into account the applicant's disability.

Successful applicants shall be notified about the OPS' policies for accommodating employees with disabilities as part of their offer of employment.

2. **Employee Supports**

The OPS will inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that takes into account an employee's accessibility needs due to disability. The OPS will provide this information to new employees as soon as practicable after they begin their employment and provide updated information to all employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability (reference the City of Ottawa's Workplace Accommodation policy).

3. **Accessible Formats and Communication Supports for Employee**

Upon an employee's request, the OPS shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- a. Information that is needed in order to perform the employee's job; and
- b. Information that is generally available to employees in the workplace.

The OPS will consult with the employee making the request in determining the suitability of an accessible format or communication support, using the City of Ottawa's Accessible Formats and Communications Supports Procedure.

4. **Workplace Emergency Response Information**

If an employee's disability is such that workplace emergency response information is necessary and the OPS is aware of the need for accommodation, this information shall be provided to the employee. In addition, this information shall be provided, with the employee's consent, to the person designated to provide assistance. The information shall undergo review when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when the OPS reviews its general emergency response plan. (Reference City of Ottawa Individualized Workplace Emergency Response Information Plan (IWERIP) – Manager's Guide, and Individualized Employee Discussion Guide.)

5. **Documented Individual Accommodation Plans**

1. A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities. The process for the development of documented individual accommodation plans shall include the following:
 - a. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
 - b. The means by which the employee is assessed on an individual basis.
 - c. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
 - d. The manner in which the employee can request the participation of a representative from their bargaining agent in the development of the accommodation plan.
 - e. The steps taken to protect the privacy of the employee's personal information.
 - f. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
 - g. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
 - h. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.
2. If requested, these plans shall include information regarding accessible formats and communications supports.
3. If requested, the plans shall include individualized workplace emergency response information.

6. **Return to Work Process**

The OPS shall have in place a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work process shall outline the steps that the OPS shall take to facilitate the return to work.

7. **Performance Management and Career Development and Redeployment**

The OPS shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing

career development, performance management and when considering redeployment.

E. BUILT ENVIRONMENT STANDARDS

1. The OPS shall comply with the AODA Design of Public Spaces Standards (Accessibility Standards for the Built Environment) and the City of Ottawa's Accessibility Design Standards when undertaking new construction and redevelopment of public spaces in the following areas:
 - a. Exterior paths of travel
 - b. Accessible parking
 - c. Obtaining services
 - d. Maintenance of accessible elements.

RESPONSIBILITIES

The Board, in consultation with the City of Ottawa's Corporate Accessibility Office, is responsible for reviewing this policy annually and recommending amendments to ensure on-going compliance with regulated accessibility standards and legislated obligations.

OPS supervisors and managers, and the Board's Executive Director, shall ensure that they and their respective staff are familiar with and comply with this policy.

MONITORING REQUIREMENTS

Failure to comply with the AODA regulations can result in administrative penalties as defined in Part V of the IASR.

Supervisors and managers shall monitor current practices to ensure compliance.

On an annual basis, the Chief of Police shall review and assess the effectiveness of the Police Service's policies and procedures related to the Integrated Accessibility Standards Regulation.

REPORTING REQUIREMENTS

1. The Chief of Police shall report annually to the Board on progress in meeting the OPS multi-year Accessibility Plan.
2. The Chief of Police shall ensure that the OPS, as an obligated large organization under the AODA, files the accessibility report required under subsection 14(1) of the Act with a director (appointed under section 30 of the AODA by the Deputy Minister) every three years, with the first report being due as of December 31, 2014. The Chief of Police shall also submit the accessibility report to the Board.

ENQUIRIES

For further information regarding this policy, contact: Board Executive Director

REFERENCES

- City of Ottawa Accessible Formats and Communications Supports Procedure
- City of Ottawa Accessibility Training for Customer Service – Reference Guide (2009)
- City of Ottawa Manager’s Guide for Individual Workplace Emergency Response Information & Plans for Employees with Disabilities (IWERIP)
- City of Ottawa Employee Emergency Information Discussion Guide
- City of Ottawa Workplace Accommodation Policy