Toronto Police Service (TPS) Accessibility for Ontarians with Disabilities Act (AODA) Customer Service Plan

This document is available in alternate formats upon request. Please contact the Equity, Inclusion & Human Rights Unit at 416-808-7443 for more information.

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Our Commitment

The Toronto Police Service (TPS) is committed to treating everyone with fairness and respect, in an impartial, equitable, sensitive and ethical manner. We value ourselves, each other, and all members of our communities, and show understanding and appreciation for our similarities and differences. The TPS is committed to providing policing services that are accessible to all persons, including persons with disabilities.

The Chief of Police has designated the Equity, Inclusion & Human Rights Unit of the TPS with the responsibility of coordinating and facilitating the implementation of the requirements of the AODA Regulations.

Providing services to persons with disabilities

The TPS is committed to excellence in serving any person who may require TPS services, including persons with disabilities, through the following areas:

Communication

TPS members have received AODA training on communication supports and alternate formats. TPS members will communicate with persons with disabilities in ways that take into account their disability. If a member of the public has an accessibility requirement they should let the TPS members they interact with know, so appropriate steps can be taken.

The TPS may communicate by telephone, the Postal Service, electronic mail (email) and in person to provide customer service.

Billing

The TPS will provide invoices in accessible formats upon request.

Assistive Devices

An assistive device is a piece of equipment a person with a disability uses to help with daily living.

Most assistive devices are “personal assistive devices,” such as a wheelchair or walker, white cane, hearing aid, oxygen tank or communication board. They belong to the person using them and are part of their personal space.

Service Animals

People with disabilities may use their service animal in all parts of our premises that are open to the public, unless the animal is excluded by law, such as in food preparation areas. In this case, we will ensure that appropriate alternative arrangements are made to ensure that the person can access the

Service. Regulatory changes to Ontario Regulation 191/11 took effect on July 1, 2016. As a result, if a TPS member cannot easily identify that the animal is a service animal the TPS member can ask the person using the service animal to provide documentation. The documentation must be from a regulated health professional to confirm that the service animal is required for reasons relating to the person's disability. Definitions for service animals and how service animals can be easily identified can be found in the definitions section at the end of this document and in Procedure 13-20.

Support Persons

The TPS is committed to welcoming persons with disabilities who are accompanied by a support person in parts of our premises that are open to the public. People with disabilities can access their disability-related support person while using our services. In situations where confidential matters will be discussed, the support person may be asked to sign a confidentiality agreement or the role of the support person may need to be agreed to in advance of the meeting.

In certain cases, the TPS might require a person with a disability to be accompanied by a support person for health or safety reasons. As a result of regulatory changes to Ontario Regulation 191/11 which took effect on July 1, 2016, before making a decision, TPS members will do the following:

- Consult with the person with a disability to understand their needs.
- Consider health or safety reasons based on available evidence.
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

In such a situation, the TPS will waive the admission fee or fare for the support person, if one exists.

Notice of Temporary Disruption

If there is a problem with facilities or services that people with disabilities rely on, the TPS will provide notice to the public. The way the TPS will provide the notice will be determined by the nature of the problem. The TPS will always try to make alternative arrangements to provide service where possible. A Notice of Temporary Disruption form is one of the available methods for TPS members to print and display at the affected police facility where appropriate. Other modes of notification could be in-person or via the TPS website.

Training

All TPS members (all police officers, civilian members employed on a permanent, temporary, seasonal, consultant or contract basis, unpaid auxiliary members, volunteers, or co-operative education program students) are required to take the following training:

- Customer Service Standard (As of July 1, 2016, this standard was revoked and incorporated into the Integrated Accessibilities Standard (IAS), Ontario Regulation 191/11).
- How the Ontario Human Rights Code works with AODA.

- IAS training on the General Requirements Standard, Information and Communications Standard, and the Employment Standard.

In addition to the training above all Senior Officers (both uniform and civilian) and all members of Facilities Management must take the IAS training on the Design of Public Spaces standard.

AODA training will be provided to all new TPS members as soon as practicable after he/she is hired by the TPS. Further, training will be implemented on an ongoing basis as amendments to the AODA are made. The Equity, Inclusion & Human Rights Unit conducts periodic audits to ensure ongoing compliance.

Feedback

The TPS endeavors to meet customer expectations when serving persons with disabilities. Comments on our services are welcomed and appreciated from members of the public and TPS members. Feedback regarding the way the TPS provides services to persons with disabilities can be made in the following ways:

- in person
- by telephone/TTY
- in writing
- by email
- AODA Feedback Form available on the TPS website on the Equity, Inclusion & Human Rights (EIHR) webpage. All AODA feedback forms will be directed to the Unit Commander of the respective Division/Facility via EIHR.

If customers with disabilities would prefer to give their feedback, and receive a response to it, using an alternate method than the one offered, they may request it.

All reviewed feedback will be addressed according to established Service management procedures.

Modifications to this or other policies

The TPS is committed to developing and enhancing customer service plans and policies that respect and promote the dignity and independence of persons with disabilities.

Questions Regarding the TPS AODA Policy

Any questions or inquiries may be directed to Equity, Inclusion & Human Rights Unit at 416-808-7443.

Definitions

Assistive Device: means an assistive device is a piece of equipment a person with a disability uses to help with daily living. Most assistive devices are “personal assistive devices,” such as a wheelchair or walker, white cane, hearing aid, oxygen tank or communication board. They belong to the person using them and are part of their personal space. [Source: Customer Service Standard training module].

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.[Source: O. Reg. 191/11 section 2].

Accessibility Standard: means an accessibility standard made by regulation under section 6. [Source: AODA section 2].

Barrier: means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice. [Source: AODA section 2].

Communications: means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received. [Source: O. Reg. 191/11 section 9 subsection1].

Communication Supports: may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, and sign language and other. . [Source: O. Reg. 191/11 section 2].

Conversion Ready: means an electronic or digital format that facilitates conversion into an accessible format. . [Source: O. Reg. 191/11 section 9 subsection1].

Disability means:

(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*; ("handicap")

[Source: AODA section 2].

Discrimination: Means any form of unequal treatment based on a *Code* ground that results in disadvantage, whether imposing extra burdens or denying benefits. It may be intentional or unintentional. It may involve direct actions that are discriminatory on their face, or it may involve rules, practices or procedures that appear neutral, but have the effect of disadvantaging certain groups of people. It may be obvious, or it may occur in very subtle ways. Discrimination needs only to be one factor among many factors in a decision or action for a finding of discrimination to be made. [Source: Ontario Human Rights Commission website]

Guide Dog: means a guide dog as defined in section 1 of the *Blind Persons' Rights Act* .[Source: O. Reg. 191/11 section 80.45 subsection 3]

Harassment: means engaging in a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome. [Source: Human Rights Code section 10 subsection 1]

Information: includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning. [Source: O. Reg. 191/11 section 9 subsection1].

Mobility Aid: means a device used to facilitate the transport, in a seated posture, of a person with a disability. . [Source: O. Reg. 191/11 section 2].

Mobility Assistive Device: means a cane, walker or similar aid. . [Source: O. Reg. 191/11 section 2].

Service Animal:

(4) For the purposes of this Part, an animal is a service animal for a person with a disability if,

(a) the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or

(b) the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:

(i) A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
(ii) A member of the College of Chiropractors of Ontario.
(iii) A member of the College of Nurses of Ontario.
(iv) A member of the College of Occupational Therapists of Ontario.
(v) A member of the College of Optometrists of Ontario.
(vi) A member of the College of Physicians and Surgeons of Ontario.
(vii) A member of the College of Physiotherapists of Ontario.
(viii) A member of the College of Psychologists of Ontario.
(ix) A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario. O. Reg. 165/16, s. 16.
[Source: O. Reg. 191/11 section 80.45 subsection 4]

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, services or facilities. O. Reg. 165/16, s. 16. . [Source: O. Reg. 191/11 section 80.45 subsection 3]

Unconvertible:

(3) If an obligated organization determines that information or communications are unconvertible, the organization shall provide the person requesting the information or communication with,
(a) an explanation as to why the information or communications are unconvertible; and
(b) a summary of the unconvertible information or communications.
[Source: O.Reg. 191/11, section.9 subsection 3]

For the purposes of this Part, information or communications are unconvertible if,
(a) it is not technically feasible to convert the information or communications; or
(b) the technology to convert the information or communications is not readily available.
[Source: O.Reg. 191/11, section 9 subsection 4]