



13-20 Accessibility for Persons with Disabilities

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Rationale

The Toronto Police Service (Service) is committed to treating everyone with fairness and respect, in an impartial, equitable, sensitive and ethical manner. We value ourselves and all members of our communities, showing understanding and appreciation for our similarities and differences.

The Service is committed to providing policing services that are accessible to all persons, including persons with disabilities.

The Equity, Inclusion & Human Rights Unit has been designated by the Chief of Police to be responsible for co-ordinating the implementation of the requirements of the Accessibility for Ontarians with Disabilities Act (AODA) and its Regulations.

Procedure

This procedure governs requests for audio and video recordings (recordings), and documents that are made available to the public, or available through application, such as information pamphlets, Clearance Letters, etc. Members shall comply with Procedure [12-08](#) when responding to requests for recordings and documents for disclosure purposes. Additionally, this procedure provides direction for bringing service animals into police facilities and all places offering a service to the public. All public establishments shall permit a person accompanied by their service animal to enter the premises and to keep the animal with them, unless the animal is excluded by law (O. Reg. 191/11 s80.47).

Member

1. In the performance of their duties shall
 - treat all people with respect, courtesy and consideration
 - not be discourteous or uncivil or use profane, abusive or insulting language to a person including, without limitation, language that tends to demean or show disrespect to a person
 - in their written and verbal communication, use language that is consistent with and promotes the principles of dignity, independence, integration and equal opportunity for people with disabilities
2. When interacting with a person with a disability shall allow them to use their own personal assistive devices to access Service goods and services, unless to do so would compromise officer or public safety.

3. When communicating with a person with a disability shall do so in a manner that takes the person's disability into account.
4. When a person is unable to speak shall attempt to determine whether this is due to a disability and/or medical condition.
5. Upon determining that the person requires a sign interpreter shall comply with Procedure [04-09](#).
6. When receiving a request for telephone communication from a person who is Deaf or hard of hearing and equipped with a Telecommunication Device for the Deaf (TDD – also known as a TTY) shall advise the person to contact Communications Services at 416-467-0493 or 9-1-1 using their TDD.
7. When receiving a request from the public for Service Governance related to the provision of services to persons with disabilities shall, in a timely manner and in compliance with AODA O. Reg. 191/11, provide the requestor
 - the [TPS Multi-Year Accessibility Plan](#), and
 - the [TPS Accessibility for Ontarians with Disabilities Act \(AODA\) Customer Service Plan](#)

by way of

- directing the requestor to the [Equity, Inclusion & Human Rights](#) page on the Service Internet website, or
 - providing the documents in printed hard copy if specifically requested, or
 - where an alternate accessible format (other than hard copy) is requested, contacting the Equity, Inclusion & Human Rights unit (EIHR) to assist
8. When receiving a request for Service information or communication in an accessible format, other than the documents listed in item 7, shall
 - refer the requester to EIHR via phone (416-808-8176) or email (equityinclusion@torontopolice.on.ca) when the request relates to information or communication that is currently publicly available, or
 - refer to Procedure [17-03](#) for all other requests
 9. When responding to requests for recordings and documents for disclosure purposes shall comply with Procedure [12-08](#).
 10. When arresting or detaining a person with a disability shall comply with Procedure [01-01](#).
 11. When searching a person with a disability shall comply with Procedure [01-02](#).
 12. When taking a person with a disability into custody shall comply with Procedure [01-03](#).
 13. When a person is accompanied by their guide dog or service animal shall
 - request the person to provide documentation from a regulated health professional if it is not easily identifiable that the animal is a service animal
 - NOT make a request for the person to disclose the nature of their disability or medical condition
 - permit the animal to remain with the person and permit them access to the public areas of the Service facility, unless
 - the animal is otherwise excluded by law from the premise, or
 - to do so would pose a health and/or safety hazard to Toronto Police Service animals lodged within
 - take alternate measures to enable the person to receive the intended police services when the animal meets the criteria listed above and is not permitted access to the Service facility

- ➔ *Allowing outside animals access to the Emergency Management & Public Order – Mounted and Specialized Emergency Response – Police Dog Services facilities may have health and safety risks for Toronto Police Service animals.*
- ➔ *The above is applicable to public establishments, whereby a service provider cannot request a person accompanied by their guide dog or service animal to disclose the nature of their disability or medical condition. Any person accompanied by their service animal shall be permitted access to the public areas of the establishment. Their animal is permitted to remain with them, unless the animal is excluded by law from the premise. If a service animal is excluded by law from the premises, the service provider must have other measures available to enable the person to obtain, use or benefit from its goods, services or facilities. (O. Reg. 191/11 s80.47)*

14. When considering the continued detention of an arrested person who is accompanied by a guide dog or service animal shall comply with Procedure [01–01](#).
15. When a person uses and/or is accompanied by a support person shall
 - whenever practicable, permit the person to bring the support person with them while in a Service facility
 - NOT make a request for the person to disclose the nature of their disability or medical condition
16. When assessing whether a support person is required shall
 - consider issues of confidentiality
 - consider the officer's ability to conduct a thorough investigation
 - 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
17. If the support person is providing language or sign interpretation services,
 - when confidentiality is an issue, or
 - when conducting an investigative interviewmay instead use a Service member interpreter or a Service-approved interpreter, in compliance with Procedure [04-09](#).
18. When a support person is necessary to assist with mobility and accessibility, protect the health or safety of the person with a disability, or the health or safety of others on the premises, may require a person with a disability to be accompanied by a support person while in a Service facility.
19. When organizing a meeting involving the public shall
 - make every effort to hold the meeting in a facility that is physically accessible to people with disabilities
 - provide meeting documents in an accessible format, upon request
20. When receiving citizen feedback and complaints regarding the manner in which the Service provides goods or services to persons with disabilities shall forward the information to the Unit Commander – Equity, Inclusion & Human Rights.
21. When subjected to an *Ontario Human Rights Code* (OHRC) violation, harassment or discrimination due to a disability
 - may seek advice regarding the means of resolution from a supervisor, a Unit Commander, or a member of Equity, Inclusion & Human Rights
 - shall comply with Procedure [13–14](#)

22. A member who requires accommodation shall comply with Procedure [08-13](#).

Supervisor

23. Upon becoming aware of an OHRC violation, harassment or discrimination due to a disability, or allegation thereof shall comply with Procedure [13-14](#).

Unit Commander

24. When in charge of a Service facility where there is a temporary disruption in the facilities, goods, or services that are normally available to the public, shall post a notice in a conspicuous place at the facility and/or on the Service Internet website that includes

- the reason for the disruption
- the anticipated duration of the disruption
- a description of the alternative facilities or services, if available

➔ *The [TPS 836](#) is available as an option to give notice to the public.*

25. When in charge of a unit that creates recordings and documents for distribution to the public shall ensure they are made available in accessible formats, upon request.

26. Upon becoming aware of or receiving a complaint of an OHRC violation, harassment or discrimination due to a disability, or allegation thereof, shall comply with Procedure [13-14](#).

27. Upon becoming aware of a member who requires accommodation, shall comply with Procedure [08-13](#).

Accommodations Coordinator (Medical) – Wellness

28. Upon determining that a member requires accommodation due to a disability or a medical condition shall comply with Procedure [08-13](#).

Unit Commander – Equity, Inclusion & Human Rights

29. The Unit Commander – Equity, Inclusion & Human Rights shall

- establish, implement, maintain and document the Service Multi-Year Accessibility Plan in compliance with O.Reg. 191/11
- ensure the Service's Multi-Year Accessibility Plan is
 - posted on the Service Internet website
 - provided in an accessible format, upon request
- review and update the Service's Accessibility Plan as required by the AODA and its Regulations
- ensure a process is established for receiving and responding to citizen feedback and complaints regarding the manner in which the Service provides goods or services to persons with disabilities that
 - permits persons to provide their feedback
 - in person
 - by telephone/TTY
 - in writing
 - by email
 - by [TPS 832](#)
 - by an alternate method, as requested
 - specifies the actions that the Service is required to take if a complaint is received

- designates the person or unit responsible for receiving and responding to feedback and complaints
- ensure a document is prepared describing the feedback process, and
 - ensure the document is posted on the Service Internet website
 - provide a copy of the document to any person, upon request
- prepare and submit any reports required by the AODA and its Regulations

Unit Commander – Communications Services

30. The Unit Commander – Communications Services shall
- ensure sufficient personnel are trained in the operation of the TDD
 - designate appropriate members to respond to requests for Service information or communications in accessible formats

Unit Commander – Toronto Police College

31. The Unit Commander – Toronto Police College shall ensure
- the appropriate training is developed and delivered, as required by the Regulations made under the AODA
 - a record is maintained of the training provided, including the training dates and the members who have received the training

Unit Commander – Corporate Communications

32. The Unit Commander – Corporate Communications shall ensure
- information about how the Service is accessible to persons with disabilities is posted on the Service Internet and Intranet websites
 - notification is posted on the Service Internet that the documents required by the AODA and its Regulations are available, upon request
 - the Service's Accessibility Plan is posted on the Service Internet website
 - all new Service Internet and Intranet web content published after 2012.01.01 is accessible to persons with disabilities

Unit Commander – Records Management Services

33. The Unit Commander – RMS shall
- designate a member to comply with the requests for Service information or communications in an accessible format
 - when necessary, along with the designate and the person with a disability, agree upon the accessible format to be used for the information or communications
 - ensure
 - the cost of providing the information or communications in an accessible format is no more than the regular cost charged to other persons for the same service
 - any information or communications requested in an accessible format is provided without undue delay
 - when the required technical resources and expertise exceeds that available within RMS, the request is forwarded to Audio & Data Systems – Communications Services and/or Property & Video Evidence Management Unit (PVEMU), as appropriate
 - upon determining that the information or communications requested in an accessible format are unconvertible, ensure the requestor is provided with

- an explanation as to why the information or communications are unconvertible, and
- a summary of the unconvertible information or communications

Unit Commander – Property & Video Evidence Management Unit

34. The Unit Commander – PVEMU shall designate appropriate members to comply with requests for Service information or communications in accessible formats.

Section Head – Audio & Data Systems – Communications Services / Member – Property & Video Evidence Management Unit

35. When receiving a request to provide Service information or communications in an accessible format shall
- comply with the request unless the information or communications requested are unconvertible
 - if necessary, along with the person with a disability, agree upon the format to be used for the information or communications
 - upon determining that the information or communications requested are unconvertible, provide the requester with
 - an explanation as to why the information or communications are unconvertible, and
 - a summary of the unconvertible information or communications

Supplementary Information

Governing Authorities

Federal: Constitution Act, Part I, Canadian Charter of Rights and Freedoms.

Provincial: Accessibility for Ontarians with Disabilities Act; Accessibility for Ontarians with Disabilities Act, O.Reg. 191/11, Integrated Accessibility Standards; Blind Persons' Rights Act; Blind Persons' Rights Act, O.Reg. 58/90, Guide Dogs; Human Rights Code; Workplace Safety and Insurance Act.

Associated Governance

TPSB Policies: TPSB Policy – Accessibility Standards for Customer Service; TPSB Policy – Accommodation.

TPS Procedures: [01–01](#) Arrest; [01–02](#) Search of Persons; [01–03](#) Persons in Custody; [04–09](#) American Sign Language and Language Interpreters; [08-13](#) Workplace Accommodation; [12–08](#) Disclosure, Duplication and Transcription; [13–14](#) Human Rights.

Other: [1.9](#) Standards of Conduct – Fairness, Discrimination and Harassment; [Toronto Police Service \(TPS\) Multi-Year Accessibility Plan](#); [Toronto Police Service \(TPS\) Accessibility for Ontarians with Disabilities Act \(AODA\) Customer Service Plan](#).

Forms: [TPS 832](#) Accessibility for Ontarians with Disabilities Act (AODA) – Customer Feedback Form; [TPS 836](#) Accessibility for Ontarians with Disabilities Act (AODA) – Notice of Temporary Disruption.

Definitions

For the purposes of this Procedure, the following definitions will apply:

Accessible Format may include, but is not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

[Source: *Accessibility for Ontarians with Disabilities Act*, O.Reg. 191/11, S.2]

Assistive Device means a device used to replace, compensate for, or improve the functional abilities of people with disabilities which includes a broad range of items such as mobility and visual/hearing aids, orthotics/prosthetics, speech devices, medical supplies, environmental controls and respiratory devices.

Barrier means 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, a policy or a practice.

[Source: *Accessibility for Ontarians with Disabilities Act*, S.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: *Accessibility for Ontarians with Disabilities Act*, O.Reg. 191/11, ss.9(1)]

Conversion Ready means an electronic or digital format that facilitates conversion into an accessible format.

[Source: *Accessibility for Ontarians with Disabilities Act*, O.Reg. 191/11, ss.9(1)]

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*; (“handicap”).

[Source: *Ontario Human Rights Code*, *Accessibility for Ontarians with Disabilities Act*]

Discriminate means to engage in conduct that treats a person or group of persons less favourably and/or differently than another person or group in the same or similar circumstances. Discrimination can be described as the result (impact) of treating a person or group unequally by imposing unequal burdens or denying benefits, rather than treating the person or group fairly on the basis of individual merit.

Guide Dog means a dog trained as a guide for a blind person and having the qualifications prescribed by *Ontario Regulation 58/90*.

[Source: ss.1(1), *Blind Persons’ Rights Act*]

Harassment means engaging in a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome.

[Source: ss. 10(1), *Human Rights Code*]

Information – AODA for the purposes of the *Accessibility for Ontarians with Disabilities Act*, means data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

[Source: *Accessibility for Ontarians with Disabilities Act*, O. Reg. 191/11 ss.9(1)]

Member - Access for the purposes of

- accessibility for members with disabilities,
- access to Service Computerized Information Systems,
- and information management

means:

- a police officer;
- a civilian member employed on a permanent, temporary, seasonal, consultant or contract basis, or;
- an unpaid auxiliary member, volunteer, or co-operative education program student.

Page means the specific portion of a social media or internet/intranet website where content is displayed.

Service Animal 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 s. 80.45(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 or services.

[Source: *Accessibility for Ontarians with Disabilities Act*, O.Reg. 191/11, S.33]

Unconvertible information or communications are unconvertible (into accessible format) 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: *Accessibility for Ontarians with Disabilities Act*, O.Reg. 191/11, ss.9(4)]

We are dedicated to delivering police services, in partnership with our communities, to keep Toronto the best and safest place to be.

Learn more about our [Service Core Values and Competencies](#) [here](#)

