



PROCEDURE OF THE WATERLOO REGIONAL POLICE SERVICE

ACCESSIBILITY FOR PERSONS WITH DISABILITIES – FACILITIES AND SERVICES

Number: 2021-148-AD	Effective: 2021/11/16	Re-evaluation: 2024/11/16
Edition: 2	Level of Risk: Low	Responsible area: Executive Office
Related Service Procedure(s): Harassment and Discrimination ; Interpreters ; Prisoner Care and Control ; Public Complaints and Chief's Complaints		

Subject

This is the Procedure addressing accessibility of *police facilities* and services for both our *members* and the community.

Table of Contents

- A. References
- B. Definitions
- C. General
- D. Assistive Devices
- E. Guide Dogs and Service Animals
- F. Support Person
- G. Accessible Formats and Communication Supports
- H. Training
- I. Feedback Process
- J. Member
- K. Supervisor
- L. Manager of Facilities
- M. Human Resources Director
- N. Officer in Charge of Training and Education
- O. Professional Standards Inspector
- P. Executive Officer
- Q. Divisional Commander

A. References

1. Accessibility for Ontarians with Disabilities Act, 2005 (AODA)
2. Blind Persons' Rights Act
3. Canadian Charter of Rights and Freedoms
4. [CNIB Clear Print Accessibility Guidelines](#)
5. [Community Resource Contact Information](#)
6. [Integrated Accessibility Standards, Ontario Regulation 191/11](#)
7. [Ministry of the Solicitor General, Policing Services Division, Guideline AI-003](#)

8. **Ontario Building Code**
9. Ontario Human Rights Code
10. **Regulated Health Professionals**
11. **Waterloo Regional Police Services Board Policy, Accessibility for Persons with Disabilities, Policy #080**
12. **Workplace Safety and Insurance Act**

B. Definitions

1. For the purpose of this Procedure:
 - a. *accessible communication* – means:
 - i. making the original communication more accessible;
 - ii. changing the usual method of communication; and/or
 - iii. using *assistive devices* or services;
 - b. **accessible formats** – means formats used by a person with a *disability* and may include, but are not limited to large print, recorded audio and electronic formats, braille;
 - c. *American Sign Language (ASL)* – means a **complete, natural** language **that is expressed by movements of the hands and face (signs) used by the majority, but not all members of the Deaf community (and some hearing people as well) primarily in North America, and uses different grammar from English;**
 - d. *assistive device* – **means 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 (e.g., wheelchair, canes, prosthetics, hearing aids);**
 - e. **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;
 - f. **blind person** - means a person who because of a visual disability has a visual acuity of 20/200 or less in both eyes after correction, and/or has a visual field of 20 degrees or narrower;
 - g. **communication supports** – means a way for people who cannot access verbal or audio information to receive it visually or a way for people who are non-verbal to communicate with people who speak. Examples may include but are not limited to:
 - i. **captioning;**
 - ii. **alternative and augmentative communication supports; and**
 - iii. **plain language, sign language and other supports that facilitate effective communication;**
 - h. *disability* – means:
 - 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, or physical reliance on a *service animal* or *assistive 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; and
 - 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. **guide dog - means a dog trained as a guide for a blind person and having the qualifications prescribed by applicable legislation and/or regulations under the Blind Persons' Right Act;**
 - j. **Integrated Accessibility Standards Regulation (IASR) – is a provincial regulation made under the AODA, that sets accessibility standards for information and communication, employment, transportation, design of public spaces, and customer service;**
 - k. **member – means all employees (including temporary, contract and part-time staff), auxiliary members and any other volunteers of the Service;**
 - l. *plain language* – means any communication style that focuses on considering the audience's needs, specifically avoiding unnecessary words, jargon, technical terms and long, ambiguous sentences;
 - m. **regulated health professional – means, for the purpose of providing documentation for a service animal, the following:**
 - 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**
 - n. **service animal – means an animal used to assist a person with a disability if:**
 - i. **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**
 - ii. **the person provides documentation from a regulated health professional confirming that the person requires the animal for reasons relating to the disability;**
 - o. *support person* – means another person who accompanies a **person with a disability** in order to help with communication, mobility, personal care, medical needs or **with** access to **goods, services or facilities;**

- p. **temporary disruption** – means a temporary planned or unexpected disruption to facilities or services that people with *disabilities* usually use to access goods, services and/or facilities; and
- q. **workplace emergency response information** – means developing, preparing, planning and providing information for the purpose of responding to and recovering from an emergency in the workplace.

Procedure of the Chief

C. General

1. The Accessibility for Ontarians with Disabilities Act, 2005 (**AODA**) is a provincial law **and recognizes the history of discrimination against persons with disabilities in Ontario**. The goal of **the AODA** is to make Ontario accessible for *disabled* people through the development and enforcement of accessibility standards. The purpose of the **AODA is to make Ontario accessible for people with disabilities by improving** opportunities through the identification, removal and prevention of *barriers* that preclude their full participation in society.
2. The AODA does not replace or change any existing laws or procedures. *Members* shall continue to comply with the Ontario Human Rights Code, the Charter of Rights and Freedoms and the Service's Harassment and Discrimination Procedure.
3. **The Service shall provide an accessible work environment in accordance with the requirements set out under the Ontario Human Rights Code and the AODA and its Regulations to accommodate people with disabilities.**
4. **Accessibility standards are the legal requirements that organizations in Ontario are required to 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.**
5. **The Service is required to and 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 are given the opportunity equal to that given to others to obtain, use and benefit from the goods and services and facilities; and may include the use assistive devices, guide dogs, service animals and support persons as is necessary to access Service goods, services or facilities.**

6. The Service will provide *police facilities*, **events** and services that are accessible to *members* and the public. The Service promotes accessibility through the development and revision of practices which consider persons with *disabilities* by addressing their **inclusion**, independence, dignity and equal opportunity.
7. The Canadian Hearing Society is the contact agency for persons requiring an ASL interpreter. Further details on this process can be found in the Interpreters Procedure.
8. **Emergency procedures, plans or public safety information made available to the public shall be provided in an accessible format, or with appropriate communications supports as soon as practicable upon request.**

D. **Assistive Devices**

1. **A person with a disability may use their assistive device(s) when accessing the goods, facilities or services provided by the Service absent any security or safety concerns or unless otherwise prohibited by law.**
2. **It is the responsibility of the user of the assistive device to ensure it is operated in a safe and controlled manner.**
3. **A member is not responsible for extensive knowledge of a person's personal assistive device(s) but should be knowledgeable on the use of any assistive device installed at a police facility.**
4. **A member shall ask permission before touching an assistive device (e.g., wheelchair, walker) as they are part of the user's personal space (unless the person is in custody and to do so would present a safety or security concern).**
5. **The Officer in Charge of a police facility shall assess a person with a disability, in custody, who is in possession of an assistive device and determine if the assistive device or aid may be maintained by the person. The presumption should be that the person is allowed to have assistive devices or aids unless security or safety concerns can justify the short-term or long-term removal.**

E. **Guide Dogs and Service Animals**

1. **A person with a disability may be accompanied by their guide dog or service animal when accessing public areas of a police facility and other areas if accompanied by a member, unless there are safety concerns or the guide dog or service animal is prohibited by law.**
2. **Where a guide dog or service animal is denied access to secure areas of a police facility or prohibited by law, a member shall advise their supervisor and/or member in charge of the police facility, extend reasonable efforts to ensure other measures are available to enable the person with the disability to obtain, use or benefit from the Service's goods, services or facilities. Consideration shall be given to alternate arrangements and/or 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 ensure equality of outcome.**
3. **If a guide dog or service animal is not readily identifiable through visual indicators such as the vest or harness worn by the animal as one that is used by the person for reasons related to their disability, a member shall, if required, request the person provide documentation from a regulated health professional confirming the requirement of the animal for reasons relating to a disability. Guide dogs must be specially trained by**

specific agencies and a blind person should, upon request, be able to provide an identification card issued by the Ontario Government to confirm that it is a guide dog if the guide dog is not already identifiable.

4. **A member shall not touch, handle, feed or speak to a guide dog or service animal without permission of its owner or handler (unless the person is in custody and it is required).**
5. **If the guide dog or service animal becomes a nuisance or cannot be controlled, direct the person to remove the guide dog or service animal from the police facility and/or leave and return when the animal is not acting in such a manner. An alternate means to provide service to the person shall be arranged.**
6. **The Officer in Charge of the police facility shall assess a person with a disability, in custody, at a police facility who requires a service animal and determine whether or not the animal can remain with the person. When making the determination, factors to consider include but are not limited to:**
 - a. **the service animal must be controlled at all times;**
 - b. **the service animal must be in close proximity to the person at all times;**
 - c. **the service animal must be housetrained or have some sort of garment that addresses urine and excrement;**
 - d. **the service animal having a leash or harness that may pose a significant risk while in a holding cell;**
 - e. **the service animal must not be barking or engaging in any aggressive behaviour;**
 - f. **the service animal must not be disruptive to others;**
 - g. **the service animal must be clean, well-groomed and odour free; and**
 - h. **the overall size of the service animal.**
7. **When a person with a disability is in custody at a police facility and the Officer in Charge determines they:**
 - a. **may keep their guide dog or service animal with them, the Officer in Charge of the police facility shall ensure appropriate arrangements are made to provide care for the animal; or**
 - b. **may not keep their guide dog or service animal with them, the Officer in Charge of the police facility shall attempt to ascertain from the person with a disability the identity of a suitable caregiver for the animal. Where no caregiver is available, the Officer in Charge of the police facility shall ensure the appropriate arrangements are made with the local Animal Control Services or Humane Society to retrieve and care for the animal until the person is released.**
8. **When a person with a disability is in custody for a show cause hearing and the Officer in Charge of the police facility has determined they may keep their guide dog or service animal, the investigating officer shall, in case the transporting agency or facility does not allow the animal:**
 - a. **attempt to make alternate arrangements, if available;**
 - b. **ask the accused for potential caretakers and note the contact information on the detain sheet;**
 - c. **if no caretaker is available, notify and/or make potential arrangements for temporary shelter or care (e.g., Humane Society); and**
 - d. **make detailed notes regarding any conversations and steps taken.**

F. Support Person

1. **If a person with a disability is accessing the goods, services or facilities of the Service, their support person may accompany them** in areas of a police facility open to the public and, at the discretion of the officer in charge, areas where the public is restricted (e.g., interview room, detention area). The *support person* shall be provided accommodation for that purpose (e.g., a chair in the interview room).
2. **A member shall** direct all communication to the **person with a disability** directly, not to the *support person*, unless required or directed to do so.
3. **A member shall ensure they obtain consent** from the **person with a disability** to release confidential information or request confidential information while the *support person* is present.
4. **A person with a disability in police custody who is with or is requesting access to their support person for communication, mobility, personal or medical needs shall have the request assessed by the Officer in Charge of the police facility who shall determine if access to a support person is allowed.**

G. Accessible Formats and Communication Supports

1. Where a **person with a disability** is to be provided a document, the **area** receiving the request shall make every effort to provide the document or information contained in a format that takes into account the person's **disability and accessibility needs**.
2. Where alternative **accessible formats** have been requested, the *member* will work with the requestor **to determine** an agreed upon, suitable **accessible format or communication support to be used** for the document or information, subject to feasibility.
3. **When a member receives** a request for an alternative **accessible format from a person with a disability**, forward the request to the supervisor responsible.
4. Alternative **accessible formats** should be provided in the most practical manner depending on the media chosen, the size and complexity of the document, the quality and source of the documents, the feasibility of the request and the number of documents to be converted. If it is determined that the requested format is not feasible, then other alternative methods of providing the information should be explored that will still meet the needs of the requestor (e.g., audio **file**, print requests, ASL interpreters).
5. The time frame for conversion to alternative **accessible formats** will vary depending on the media chosen, the size, complexity, quality of source documents, number of documents converted and number of agencies involved in the process. Every effort shall be made to provide documents in a timely manner.
6. Conversion shall be processed in house wherever possible. The cost of conversion, including materials and distribution, will be covered by the Service.
7. Documents printed by the Service, where possible, shall adhere to the Canadian National Institute for the Blind's Clear Print **Accessibility Guidelines** (see CNIB Clear Print Accessibility Guidelines).

H. Training

1. **Every member of the Service who provides goods, services or facilities, including any person who provides these on behalf of the Service, shall receive training regarding provision of these to a person with a disability. Updated training shall be provided as necessary when changes are made to procedures and/or practices governing services provided to a person with a disability.**

2. **Every member shall receive training regarding interacting, communicating and assisting persons with disabilities and accessing assistive devices available in a police facility.**

I. **Feedback Process**

1. **Pursuant to the IASR, 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 disabled people by the Service.**
2. **Members of the public 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. Customers may contact Equity Diversity and Inclusion Unit (EDI) by:**
 - a. **visiting the following website www.wrps.on.ca or emailing EDI@wrps.on.ca;**
 - b. **phone at 519-570-9777; and**
 - c. **mail to: Attention – Equity, Diversity and Inclusion- Waterloo Regional Police Service 200 Maple Grove Rd, Cambridge, Ontario, N3H 5M1.**
3. **Accessible formats and communication supports will be made available upon request.**
4. **All comments shall be reviewed by the Supervisor of EDI, or designate, and responded to in a timely manner, ensuring steps are taken to address the issues, where necessary.**

J. **Member**

1. **A member interacting with a person with a disability shall:**
 - a. Demonstrate **respect**, patience and a willingness to find a way to communicate;
 - b. not make assumptions about the type of *disability* a person may have as certain *disabilities* may have similar characteristics;
 - c. **permit the use of assistive devices, if applicable, and provide accommodation for those who may require them;**
 - d. **if a person with a disability is unable to access a police facility or services through the use of their assistive device:**
 - i. determine if the service or police facility is inaccessible, based on the individual's requirements;
 - ii. assess service delivery and potential service options to meet the needs of the individual, using the list of Community Resources, if necessary; and/or
 - iii. inform their immediate supervisor of the inaccessible police facility or service;
 - e. when receiving feedback about the manner in which services are provided to a **person with a disability**, provide the contact information for and direct the person to contact **EDI by the means listed in Section M(1)**;
 - f. when receiving an official public complaint about a *barrier* or lack of accessibility to a **person with a disability**, follow the **Public Complaints and Chief's** Complaints Procedure as it relates to Service/**Policy** complaints;
 - g. when receiving a complaint about an accessibility issue, whether police facility or service related, notify their supervisor;
 - h. when receiving a request from a member of the public for an ASL interpreter notify their supervisor **and comply with the Interpreters Procedure**; and

- i. when recognizing or receiving a report of a ***temporary*** disruption to public access to a police facility (e.g., breakdown of elevator, automatic door not functioning), immediately report the condition to a supervisor.
2. **When a member denies a person with a disability access to their assistive device, guide dog, service animal, or support person, for any reason, the member shall advise a supervisor providing the reason why access was denied and note the reason in their notebook.**

K. Supervisor

1. A supervisor shall:
 - a. upon receiving a request for an ***accessible*** format, determine the feasibility of the request and:
 - i. if feasible, make every effort to process the request through the appropriate resource; or
 - ii. if not feasible, contact the individual to determine an alternative solution;
 - b. upon receiving a request for an ASL interpreter **comply with the Interpreters Procedure; and**
 - c. notify the Divisional **Senior Leader** when advised of or receiving a complaint relating to:
 - i. an accessibility issue to a police facility or service; and/or
 - ii. a ***temporary*** disruption to public access to a police facility.
2. **When advised by a member that they have denied a person with a disability access to their assistive device, guide dog, service animal, or support person, for any reason, the supervisor shall determine if the reason is acceptable and make note of the reason provided. If after being provided the reason, the supervisor believes a person with a disability should have access to an assistive device, guide dog, service animal, or support person, notify the member to allow the requested assistance and make note of the decision. If possible, the supervisor will explain the rationale to the person with a disability, seek alternative arrangements as set out in this Procedure, and, if applicable, apologize.**

L. Manager of Facilities

1. The **Manager of Facilities or designate** shall:
 - a. in the event of a ***temporary*** disruption, ensure public notification is made by the Executive Officer or designate; **and**
 - b. work in conjunction with **the** Divisional Commander of **an** area affected by a ***temporary*** disruption and ensure steps are taken to correct the disruption.

M. Human Resources Director

1. **The Human Resources Director or designate shall:**
 - a. **notify employees and the public about the availability of accommodations 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 due to a *disability*;
- d. inform employees of the policies in place to support employees with *disabilities* including those on the provision of work accommodation that take into account an employee's accessibility needs due to a *disability*;
- e. consult with employees with a disability and provide or arrange for the provision of *accessible formats, communication supports, and/or an individual accommodation plan as required*;
- f. provide individualized *workplace emergency response information* to employees who have a *disability*, if the *disability* is such that the individualized information is *necessary and the employer is aware of the need for accommodation due to the employee's disability*;
- g. if an employee who receives individualized *workplace emergency response information* requires assistance and with the employee's consent, provide the *workplace emergency response information* to the person designated by the Service to provide assistance. This shall be done as soon as practicable after becoming aware of the need for accommodation due to the employee's *disability*; and
- h. review the individualized *workplace emergency response information* when a *member* moves to a different location in the Service, or when the *member's* overall accommodation needs change.

N. Officer in Charge of Training and Education

1. **The Officer in Charge of Training and Education, or designate shall:**
 - a. ensure a training plan is developed to instruct *members* on the provision of services to persons with *disabilities* including but not limited to:
 - i. review of the Ontario Human Rights Code as it pertains to persons with *disabilities*;
 - ii. review of the purpose of the AODA, its requirements and Regulations;
 - iii. recommended practices for interaction with people with various types of disabilities, and those who use service animals, support persons, *assistive devices* or ASL interpreters;
 - iv. how to use equipment or *assistive devices* available in a police facility, or that WRPS otherwise provides which may be of service to a person with a *disability*; and
 - v. what to do if a person with a particular type of *disability* is having difficulty accessing police facilities or services.
2. **electronically document all AODA and related** training, in accordance with the Act, including the dates provided and the names of those in attendance.

O. Professional Standards Inspector

1. The Professional **Standards Inspector** shall ensure that all Service complaints received in relation to accessibility for a **person with a disability** are investigated promptly in accordance with the **Public Complaints and Chief's** Complaints Procedure.

P. Executive Officer

1. **The Executive Officer, or designate, shall:**
 - a. **in the event of a facilities service disruption, ensure that internal and external notifications are made including the reason for disruption, anticipated duration, and alternative facilities that may be available;**
 - b. **develop and maintain a multi-year Accessibility Plan, in consultation with Service stakeholders, outlining its strategy to prevent and remove *barriers* and meet requirements under the IASR;**
 - c. **ensure that the Accessibility Plan is posted on the Service's external website in an accessible format;**
 - d. **review and update the Service's Accessibility plan at least once every five years; and**
 - e. **prepare and submit any reports as required by the AODA and its Regulations.**

Q. Divisional Senior Leader

1. The Divisional Commander or designate shall, upon receiving a report of a ***temporary* disruption** to their police facility:
 - a. immediately report the condition to the **Manager of Facilities or designate**; and
 - b. work in conjunction with the **Manager of Facilities or designate** to ensure steps are taken to correct the situation.