



Toronto Police Service (TPS) Multi-Year Accessibility Plan 2016 – 2021

**This document is available in
alternate formats upon request.
Please contact the TPS
Diversity & Inclusion 416-808-7443
for more information.**

Toronto Police Service Multi Year Accessibility plan from 2016 to 2021

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Statement of Commitment

The TPS is committed to treating all people in a way that allows them to maintain their dignity and independence. The TPS believes in integration and equal opportunity, and the TPS is committed to meeting the needs of people with disabilities in a timely manner. The TPS will do so by identifying, removing, and preventing barriers to accessibility while meeting the accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA).

Introduction

The Toronto Police Service 2016-2021 Multi-Year Accessibility Plan (Accessibility Plan) was updated in October 2016 and it outlines the TPS's strategies to meet its legislative obligations under the Accessibility for Ontarians with Disabilities Act (AODA); and its policy commitments to creating an accessible organization and delivering accessible services to all stakeholders. This multi-year plan is the updated version of *The Toronto Police Service 2014-2021 Multi-Year Accessibility Plan*.

Background

The AODA became law in 2005. It aims to have an accessible Ontario by 2025 through the implementation of mandatory accessibility requirements that organizations must meet in various areas.

In January 2008, the Accessibility Standards for Customer Service referred to as Ontario Regulation 429/07 came into effect. In June 2011, the Ontario government released the AODA Integrated Accessibility Standards (IAS) referred to as Ontario Regulation 191/11. These standards include: General, Information and Communication, Employment, Transportation and Design of Public Spaces.

On July 1, 2016 the Accessibility Standards for Customer Service regulation was revoked and was incorporated into the IAS. Therefore, moving forward there is no separate Customer Service standard. All AODA standards are contained within the IAS (Ontario Regulation 191/11).

The TPS's *Accessibility Plan* is being presented in a multi-year format. The legislated multi-year plan provides the overall approach of how the TPS will meet the requirements of the IAS. It details strategies and actions to identify, prevent and remove barriers for people with disabilities in our services, programs and facilities. The multi-year accessibility plan will be posted on the TPS's website and made available in accessible formats, upon request.

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Barriers to Accessibility

Accessibility provides people of all abilities the opportunity to participate fully in life. People with disabilities often do not engage in many of the activities that most of us take for granted. This may be due to barriers that could affect a person with a disability such as:

- Architectural and physical barriers are features of buildings or spaces that cause problems for people with disabilities.
- Information or communications barriers arise when a person cannot easily understand information.
- Attitudinal barriers are those assumptions and actions that discriminate against people with disabilities.
- Technology barriers occur when a technology is not designed to support various assistive devices.
- Organizational barriers are an organization's policies, practices or procedures that discriminate against people with disabilities.

Diversity & Inclusion (D&I)

The Chief of Police has designated the D&I section of the TPS with the responsibility of coordinating and facilitating the implementation of the requirements of the AODA Regulations.

The primary focus of D&I is to coordinate all human rights and diversity activities and to build strategic cultural change, with the goal of facilitating a service wide appreciation of diversity; D&I aims to increase opportunities for all TPS members (members) to implement these values in their work environment.

Any questions or inquiries can be directed to Diversity & Inclusion 416-808-7443.

Monitoring and Evaluating

The TPS will monitor and evaluate compliance with AODA with input from Accessibility Leadership Committee (ALC). In future, the Accessibility Plan will be updated at least every five years to maintain compliance with AODA. These updates will reflect steps taken to improve accessibility, highlight achievements that have been made, make any adjustments needed to meet the timelines under the IAS and ensure the full implementation of the requirements.

Feedback is imperative to the evaluation process. The TPS will continue to review and develop strategies to engage stakeholders in providing accessibility related feedback, including people with disabilities.

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Toronto Police Service Accessibility Leadership Committee (ALC)

Fostering an inclusive organization and delivering accessible services is an important endeavor. This plan was developed in consultation with the ALC. It is composed of member representatives from all areas within the TPS, who provide invaluable feedback and advice and direction on various aspects of accessibility, including the development of accessibility plans. Committee members also ensure that the actions, outlined in our accessibility plans, are carried out within their own departments. The ALC meets regularly to review and create strategies to ensure the TPS continues to meet the Provincial requirements of the AODA.

Definitions

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. (O.Reg.191/11 section 2).

Assistive Device: means an implement used to aid individuals with physical disabilities or limitations in performing movements, tasks, or activities, which include, but are not limited to, hearing aids, prosthetics, eyeglasses, respiratory devices, canes and walkers. [Source: Customer Service Standard training module].

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. (AODA section 2).

Communications: for the purposes of this document, means the interaction between two or more persons or entities, or where information is provided, sent or received. (Source: O.Reg.191/11 section 9).

Communication Supports: may include, but are not limited to, captioning, alternate and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications. (O.Reg.191/11 section 9).

Disability: means 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:

- a condition of mental impairment or a developmental disability.

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- a learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
- a mental disorder.
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act. (AODA s.2).

Information: means 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(1)].

Organization: means any organization in the public or private sector and includes: the Government of Ontario and any board, commission, authority or other agency of the Government of Ontario, any agency, board, commission, authority, corporation or other entity established under an Act, a municipality, an association, a partnership and a trade union, or any other prescribed type of entity. (“organization” (AODA s.2).

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How the TPS is meeting its obligations under the IAS?

IAS has four parts which apply to the TPS:

- General Requirements which had compliance date of January 1, 2012.
- Information and Communications which had compliance date of January 1, 2015.
- Employment which had compliance date of January 1, 2016.
- Design of Public Spaces which has a compliance date of January 1, 2017.

There are some exceptions to the compliance dates such as compliance for websites. Additionally, the TPS must report to the Ministry of Economic Development and Growth before December 31, 2017 and every 3 years thereafter.

How the TPS has met the Customer Service Standard – compliance date January 1, 2012?

Table 1: Goals for Customer Service Standard and How the TPS are meeting these goals.

Goals for the Customer Service Standard	How the TPS implemented and is continuing to meet the Customer Service Standard
Establish and document policies, practices and procedures	<p>On December 17, 2009 Toronto Police Service Board (TPSB) approved a policy on AODA. This policy is available on the TPSB website.</p> <p>The TPS has implemented a Procedure, (Procedure 13-20), as per AODA requirements. This was communicated to members through Routine Order 2011.12.28-1384-New Procedure 1320.</p> <p>The TPS, through the use of its internal network system (Routine Orders), notifies members of any changes, updates and training relating to the AODA.</p> <p>An Accessibility Leadership Committee (ALC) has been established, which meets regularly to ensure that AODA compliance is being met.</p>
Create a Customer Service Plan.	The TPS AODA Customer Service Plan Providing Services to Persons with Disabilities was created and posted on the TPS's website where it is accessible to the general public, including

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Goals for the Customer Service Standard	How the TPS implemented and is continuing to meet the Customer Service Standard
	<p>availability in accessible formats. The Customer Service Plan was reviewed and revised in October 2016. The Customer Service Plan outlines the practices employed by the TPS in the following areas:</p> <ul style="list-style-type: none">• Communication with person with a disability, taking into account their disability.• Provide the public with documents in alternate formats upon request.• Use of assistive devices by persons with a disability• Use of Service Animals by persons with a disability.• Use of support persons by persons with a disability.• Notice of temporary disruptions. A TPS form is available for members to fill out and post in the areas in which they work to inform members of the public of any interruptions to service. (TPS Form 836). This was communicated to members via Routine Order 2013.03.18-0310-Accessibility for Ontarians with Disabilities Act.• Training on the Customer Service Standard provided to all members. Records of training are maintained through electronic systems. Training was delivered to members through an electronic Learning Management System called Canadian Police Knowledge Network (CPKN) and members are tracked through internal electronic Human Resources Management System (HRMS). This process is ongoing to ensure all new members are trained.• A feedback form is available on the TPS website. (TPS Form 832). This was communicated to members via Routine Order 2013.03.18-0310-Accessibility for Ontarians with Disabilities Act. This form is available in an alternate format upon request.• Modifications to policies.• An Active-Offer Accessibility sign is prominently displayed at each publicly accessible police facility. The sign states, "If you have any questions or concerns about accessibility, please ask us" in English and French.

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Table 2: Goals for General Requirements Standard and how the TPS implemented this standard.

Goals for General Requirements Standard	How the TPS implemented and is continuing to meet the General Requirements Standard
Provide Training to members	<p>In addition to the Customer Service Standard training mentioned in the section above, members received additional training on IAS as follows:</p> <ul style="list-style-type: none"> • How the AODA and the Ontario Human Rights Code works together (This was communicated to members through Routine Order 2013.07.24-0882-Mandatory Online Accessibility AODA Training) • General Requirements Standard • Information and Communications Standard • Employment Standard • Design of Public Spaces <p>The requirement for members to complete IAS training for the General Requirements, Information and Communications, Employment and Design of Public Spaces standards was issued to members by way of Routine Order 2015.04.22-0389-Mandatory 2015 Online Accessibility for Ontarians with Disabilities Act (AODA) Training.</p> <p>Training was delivered to members through an electronic Learning Management System called Canadian Police Knowledge Network (CPKN) and members are tracked through the internal electronic Human Resources Management System (HRMS). This process is ongoing to ensure all new members are trained.</p> <p>Diversity & Inclusion conducts periodic audits from the HRMS system and provides management and Command with detailed lists of any members who have not completed the mandatory AODA courses on CPKN.</p>

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Table 3: Goals for Information and Communications Standard and how the TPS implemented this standard.

Goals for the Information and Communications Standard	How the TPS implemented and is continuing to meet the Information and Communications Standard
<p>Accessible Formats and Communication Supports</p>	<p>The Accessibility Leadership Committee (ALC) provides guidance on issues related to accessible and alternate formats.</p> <p>All members receive training on what accessible and alternate formats are, and what communication supports are through the mandatory courses on CPKN.</p> <p>Diversity & Inclusion is the contact for members of the public to reach out to for additional information on accessible formats. This information is available on the TPS website on the D&I page (tps.on.ca/diversityinclusion).</p> <p>The TPS Records Management Services (RMS) department receives requests for accessible formats. D&I works with RMS to provide documents in an agreed upon accessible format.</p> <p>Diversity & Inclusion provides in-house training for members on how to create accessible Microsoft Word documents and pdf (portable document format) documents.</p> <p>The TPS is currently looking into creating a contract with a third-party company to provide additional alternate formats when requested by the TPS. This is in addition to the steps already implemented to ensure alternate formats are provided when a member of the public makes such a request.</p>

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Goals for the Information and Communications Standard	How the TPS implemented and is continuing to meet the Information and Communications Standard
Feedback Process	<p>The Customer Service Plan outlines the ways in which a member of the public can provide feedback. The methods include in-person, over the phone, through the online form and via email.</p> <p>Diversity & Inclusion receives the feedback forms and directs the forms to the appropriate unit for action. All feedback is addressed according to established TPS management procedures.</p> <p>The online form is available on the TPS website and can be requested in an alternate format.</p>
Emergency procedures, plans or public safety information	<p>When a person requiring assistance visits a police facility there is an active-offer sign displayed letting the public know they can request assistance. Members have been provided training on communication supports. Members can work with the member of public in a way which takes their disability into account and ensure the member of the public understands what the emergency procedures, evacuation routes etc. are.</p> <p>Additionally, if a member requests a copy of the emergency plans in an alternate format, they can work with a member who can liaise with Diversity & Inclusion to provide an agreed upon alternate format.</p>
Accessible websites and web content	<p>The TPS Corporate Communications section has worked to ensure the TPS website complies with the technical standards outlined in the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA by January 1, 2021.</p> <p>A member of the public can provide feedback using the online feedback form if desired or alternatively use any other method outlined in the Customer Service Plan.</p>

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Table 4: Goals for Employment Standard and how the TPS implemented this standard.

Goals for the Employment Standard	How the TPS implemented and is continuing to meet the Employment Standard
<p>Informing new and existing members of supports</p>	<p>All new hires are informed of the available supports during their orientation session by HR. Specifically, they are told about TPS Procedure 08-13 (Workplace Accommodation – Medical) and Procedure 13-20 (Accessibility for Persons with Disabilities).</p> <p>Current members are notified of supports through a variety of methods including:</p> <ul style="list-style-type: none"> • AODA training for the Employment Standard provides information to the member of the TPS’s responsibility to provide supports to a member in case of a disability • Routine Order 2013.03.18-0310(Accessibility for Ontarians with Disabilities Act) for members requiring assistance in the event of an emergency. • Procedure 8-13 (Workplace Accommodation- Medical) is available to all members via the TPS intranet. This procedure addresses the process to be followed if a member requires an accommodation due to a disability.
<p>Accessible formats and communication supports</p>	<p>This requirement is similar to those in the Information and Communications Standard and this information is provided to members in the Employment Standard AODA training.</p> <p>The TPS consults with members to determine their accessibility needs and how best to accommodate them on an individual level.</p> <p>The accommodation could be:</p> <ul style="list-style-type: none"> • Information that is needed in order to perform the member’s job. • Information that is generally available to members in the workplace. <p>D&I provide guidance to involved parties to arrive at an acceptable outcome.</p> <p>All internal job call/promotion documents created by the Human</p>

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Goals for the Employment Standard	How the TPS implemented and is continuing to meet the Employment Standard
	<p>Resources ensure that all members are advised that accommodations are available upon request.</p>
<p>Workplace Emergency Response Information</p>	<p>A TPS form was made available in June 2012 on the TPS intranet for members to identify what kind of assistance they require in an emergency.</p> <p>The TPS has revisited this process and is currently working to automate this process in the HRMS system. This process is ongoing. In the meantime Routine Order 2013.08.07-0939(Accessibility for Ontarians with Disabilities Act) applies and members can fill this form out and follow the instructions to initiate the process.</p> <p>Once the new automated system for TPS Form 837 is in place all members will be informed by way of Routine Order.</p>
<p>Documented Individual Accommodation</p>	<p>The TPS has well-established processes in place that meet these requirements. This process is facilitated by OHS - Medical Advisory. This process is initiated under Procedure 08-13 (Workplace Accommodation – Medical).</p> <p>Individual accommodations are incorporated into all transitional modified work and permanent accommodation programs.</p> <p>There is ongoing communication with members regarding the processes for getting their needs met regarding disability accommodation at any time during their employment.</p> <p>The TPS has documented the process to be followed for developing individual accommodations and will review and update them annually to ensure that all AODA requirements are met.</p> <p>There are processes in place for members to retrieve information in accessible formats upon request.</p> <p>OHS reviews accommodations to ensure that accessible formats are offered and noted on the plan if and when required.</p>

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Goals for the Employment Standard	How the TPS implemented and is continuing to meet the Employment Standard
	<p>A process has been established for Emergency Response for Members with Disabilities.</p> <p>Accommodations will include information on supports provided, individualized workplace emergency response information, and any other accommodation to be provided into all modified work/permanent as required.</p>
Return to work process	<p>This process forms part of the Procedure 08-13 (Workplace Accommodation – Medical). A member who requires accommodation due to disability communicates with members of OHS – Medical Advisory and an appropriate return to work plan is put in place.</p> <p>TPS procedure 08-02 (Sickness Reporting) outlines the return-to-work process. The steps the employer will take to facilitate the member including aspects related to AODA will be documented.</p>
Performance management, career development and redeployment	<p>TPS procedure 14-02 (Evaluations, Reclassifications and Appraisals) details that accommodation and accessibility needs must be taken into account when conducting performance appraisals. Any redeployment of personnel process takes into account any individual accommodation plans for members with a disability. The procedure was updated on May 30, 2016.</p>
Recruitment/Assessment of Selection Process	<p>Every job call on the external TPS website informs potential candidates that accommodation is available upon request. Employment Unit includes this information in external job calls.</p> <p>When an applicant identifies a need for accessibility members of the Employment Unit consult with the applicant and provide suitable accommodation in a manner that takes into account the applicant's accessibility needs to their disability.</p>

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Table 5: Goals for Design of Public Spaces Standard and how the TPS implemented this standard.

Goals for the Design of Public Spaces Standard	How the TPS implemented and is continuing to meet the Design Of Public Spaces
Construction of new police facilities or renovations to existing facilities	The TPS Facilities Management department is staffed by professionals with expertise in this area. They work with the City of Toronto to ensure all new buildings comply with this standard.

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Moving Forward

The TPS continues to meet the standards as set out in the IAS. Additionally, the TPS will continue to review and enhance these processes regularly to affirm our commitment to treating all people in a way that allows them to maintain their dignity and independence.

The next reporting date for the TPS to file a report with the Ministry of Economic Development and Growth is before December 31st, 2017. The TPS is currently focusing on enhancing the following processes to increase the level of Customer Service:

- In November 2016 TPS launched an internal AODA website which will be accessible to members only. It will act as a one-stop-shop for AODA related information within the TPS. The aim is to make it easier for members to access information 24/7.
- Diversity & Inclusion is responsible for updating the internal AODA website to ensure relevant AODA information is accessible to all members. This, in turn, will increase the level of accessibility the TPS provides to both the public and its members.
- D&I conducts periodic audits to ensure all members are up-to-date with the mandatory AODA training.
- The TPS is enhancing its commitment to its members by inserting a statement in an internal software application called TPS Forms. TPS forms are available in alternate formats upon request. D&I is working with Governance to implement this.
- D&I delivers in-house training to members on how to create accessible Microsoft Word documents and accessible pdf's (portable document format). This will be delivered at the Toronto Police College from the beginning of 2017.
- The City of Toronto uses a third party vendor specializing in creating complex documents into accessible formats. D&I is working with the City of Toronto to determine the suitability of using the same vendor for the TPS. This process is ongoing.
- Ongoing AODA training will be delivered to all members as required.
- D&I responds to enquiries from the public and members on issues relating to AODA compliance.

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Ensuring accessible services

The TPS is committed to ensuring its services and facilities are accessible to persons with disabilities.

We Welcome Your Feedback

Please let us know what you think about the Toronto Police Service 2016-2021 Multi-Year Accessibility Plan and accessibility issues in general. To request a copy of the plan in an alternate format or to send us your comments or questions, please contact us at:

Toronto Police Service

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To view this plan online visit www.torontopolice.on.ca/diversityinclusion

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References

Accessibility Directorate of Ontario. Ministry of Community and Social Services.

- *Towards an Accessible Ontario: Accessibility for Ontarians with Disabilities Act, 2005*. For more information please visit: [Accessibility Laws](http://www.mcass.gov.on.ca/en/mcass/programs/accessibility/) (<http://www.mcass.gov.on.ca/en/mcass/programs/accessibility/>).
- Service Ontario-elaws (2005) *Accessibility for Ontarians with Disabilities Act, 2005* S.O. 2005: For more information please visit: [AODA Legislation Online](https://www.ontario.ca/laws/statute/05a11%20-%20BK9). (<https://www.ontario.ca/laws/statute/05a11%20-%20BK9>)

Toronto Police Service: Rules and Procedures- Service Procedures.

Service Ontario-elaws (2005) *Accessibility for Ontarians with Disabilities Act, 2005*

- Ontario Regulation 191/11: For more information, please visit: [Integrated Accessibility Standards](http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_110191_e.htm) (http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_110191_e.htm.)