



**Stratford Police Service AODA Service Plan  
and  
Accessibility Plan Compliance Framework  
for  
Providing Services to Persons with Disabilities  
Revised and Adopted: March 2014**

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## **Introduction**

The *Accessibility for Ontarians with Disabilities Act (2005)* was established to introduce standards to make various aspects of life in Ontario more accessible for persons with disabilities. Regulations made under the *Act* require small and large organizations in the private and public sectors to meet the developed standards with the goal of attaining accessibility by the year 2025. As stated in Stratford Police Service policy, the Service respects the principles of dignity, independence, integration and equal opportunity for all persons, and is committed to meeting the accessibility needs of persons with disabilities.

The *Accessibility Standards for Customer Service* and the *Integrated Accessibility Standards* regulations made under *AODA* lay out a number of requirements that, as a public organization with over 50 employees, the Stratford Police Service is legislated to meet to help the Service become more accessible to persons with a disability. A number of initiatives have already been completed or are in progress, with others planned for the future. This Accessibility Plan provides information on how the Service will prevent and remove barriers to accessibility and meet its obligations under the *Integrated Accessibility Standards* regulation. This plan is under the purview of the Stratford Police Service's Deputy Chief, who will also ensure the plan is reviewed and updated once every five years and that annual reports on the progress made on this plan are filed. A full listing of the standards referred to in the following pages can be found in the *Integrated Accessibility Standards Ontario Regulation 191/11* made under the *Accessibility for Ontarians with Disabilities Act, 2005*.

## **Our commitment is to provide services to persons with disabilities**

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

The Chief of Police is responsible for co-ordinating the implementation of the requirements of the *Accessibility for Ontarians with Disabilities Act (AODA)* and its Regulations.

### **A. Communication**

The Service is committed to excellence in serving all members of the public including persons with disabilities through the following areas:

#### **Communication**

The Service will ensure that all members communicate with persons with disabilities in ways that take into account their disability. Members will communicate by telephone, the Postal Service, and various types of Portable Telecommunication Equipment, as best suited to the person's communication needs.

#### **Billing**

The Service will provide invoices in accessible formats upon request.

### **B. Assistive Devices**

The Service is committed to serving persons with disabilities who use assistive devices to obtain, use, or benefit from the goods and services we provide. The Service will ensure that all members are trained and familiar with various assistive devices that may be used by members of the public with disabilities.

### **C. Service Animals**

The Service is committed to welcoming persons with disabilities who are accompanied by a service animal in parts of our premises that are open to the public. The Service will also ensure that all members who deal with the public are properly trained on how to interact with persons with disabilities who are accompanied by a service animal.

### **D. Support Persons**

The Service 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. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while in the Service's public premises.

### **E. Notice of Temporary Disruption**

The Service will provide members of the public with notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will include information such as:

- Information regarding the reason for the disruption;
- How long the disruption is expected to last;
- Alternative facilities or services, if any, that are available.

#### **F. Training for Staff**

All Service members will receive training on the requirements of the integrated Accessibility Standards (O.Reg 191/11) and the Ontario Human Rights Code.

Training will include an overview of AODA 2005 (O.Reg 429/07 Accessibility Standards for Customer Service), including:

- How to interact and communicate with persons with various types of disabilities
- How to interact with persons with disabilities who use assistive devices or require the assistance of a guide dog or service animal, or a support person
- How to use equipment or devices available on the Service's premises or otherwise provided by the Service 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 goods and services provided by the Service.

AODA training will be provided to each new member as soon as practicable after he or she is hired by the Service.

Further, training will be implemented on an ongoing basis as amendments to the AODA are made.

Member training will be recorded.

#### **G. Feedback Form**

The ultimate goal of the Service is to meet and surpass customer expectations when serving persons with disabilities. Comments on our services are welcomed and appreciated. Feedback regarding the way the Service provides services to persons with disabilities can be made by:

- Telephone
- In person
- In writing

- By email

The Police Service AODA Feedback Form, which is available from the Service upon request.

All AODA feedback forms will be directed to the Chief of Police. The Chief of Police will address all reviewed feedback according to established Service management procedures.

#### **H. Modifications to this or other policies**

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

#### **I. Questions Regarding the Stratford Police Service AODA Policy**

The Chief of Police is responsible for co-ordinating the implementation of the requirements of the Accessibility for Ontarians with Disabilities Act (AODA) and its Regulations. Any questions or inquiries may be directed to the Chief of Police.

#### **J. Duties of Municipalities and Taxicabs**

The Stratford Police Services Board is responsible for the regulation of taxicabs in the City of Stratford, and will ensure that licensed owners and operators of taxicabs do not charge a higher fare or additional fees to a passenger with a disability.

The Board has also consulted with the public and with the City Accessibility Advisory Committee (in 2012) to determine the proportion of accessible taxicabs required in the community.

#### **K. Definitions**

- i. ***Accessible formats*** include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- ii. ***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.

- iii. **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 (obstacle).
- iv. **Communications** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.
- v. **Communication supports** may include, but are not limited to, captioning, alternative and augmentative communications supports, plain language, sign language and other supports that facilitate effective communications.
- vi. **Conversion Ready** means an electronic or digital format that facilitates conversion into an accessible format.
- vii. **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 coordination, blindness or visual impairment, 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 device;
  - a condition of mental impairment or a developmental disability,
  - 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; or
  - an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.
- viii. **Discriminate** means to engage in conduct that treats a person or group of persons less favorably 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.

- ix. **Guide Dog** means a dog trained as a guide for a blind person and having the qualifications prescribed by O.Reg. 58/90.
- x. **Harassment** means engaging in a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome.
- xi. **Information** means data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.
- xii. **Member** 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.
- xiii. **Portable Telecommunication Equipment** means any portable telecommunication or electronic signaling device including, but not limited to:
- cellular/smart telephones
  - laptop computers with Internet access
  - portable electronic mail (e-mail) devices
  - personal digital assistant (PDA)
- xiv. **Service animal** means:
- a guide dog;
  - other animals, for which it is readily apparent, used by a person with a disability for reasons related to his or her disability; or
  - or the person may provide a letter from a physician or nurse or certified agency confirming that the person requires the animal for reasons relating to his or her disability.

- xv. **Support person** means another person who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to services.
- xvi. **Unconvertible** describes information or communications that 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.

## Accessibility Plan Compliance Framework

Under the *Integrated Accessibility Standards* regulation, the Stratford Police Service is considered a large (50 or more employees) obligated organization. This status determines what requirements under the regulation the Service must meet and when those requirements need to be met.

The *Integrated* regulation divides the standards into four parts: General Standards; Information and Communication Standards, Employment Accessibility Standards; and Transportation Standards. Those standards applying to the Stratford Police Service are listed below, along with the action that has or will be taken to meet the standard.

### Part I – General Standards

| Item | Standard   | Section | Compliance      | Action  | Compliant? |
|------|--|---------|-----------------|---|------------|
| 1    | <b><i>Establishment of Accessibility Policies</i></b><br>Employers are to develop, implement and maintain policies on achieving accessibility, presently and in the future, pursuant to the <i>Regulation</i> , including a statement of commitment to the assurance of accessibility. Written descriptions of such policies are to be made available to the public and in an accessible format upon request.    | 3       | January 1, 2013 | <ul style="list-style-type: none"> <li>• Develop a new Stratford Police Service General Order regarding Accessibility</li> <li>• Revise the Stratford Police Service Accessibility Accommodation General Order</li> <li>• Make policies available to the public upon request</li> </ul> | Yes        |
| 2    | <b><i>Accessibility Plans</i></b><br>Employers are to prepare, implement, maintain and document a multi-year accessibility plan which must be reviewed and updated at least once every five years, in consultation with an accessibility advisory committee if one is established, and persons with disabilities. The plan is to be posted on public websites and provided in an accessible format upon request. | 4       | January 1, 2013 | <ul style="list-style-type: none"> <li>• Develop an Accessibility Plan</li> <li>• Present the plan to stakeholders</li> <li>• Post the plan on the Stratford Police Service website</li> <li>• Adopt the plan</li> </ul>  | Yes        |

|   |  |   |                 |  |     |
|---|--|---|-----------------|--|-----|
| 3 | <p><b><i>Procuring or Acquiring Goods, Services of Facilities</i></b><br/> Accessibility criteria and features are to be incorporated when procuring or acquiring goods, services or facilities, except where it is not practicable to do so. In such a case, an explanation as to why it is not practicable is to be provided upon request.</p>   | 5 | January 1, 2013 | <ul style="list-style-type: none"> <li>• Incorporate this standard into Stratford Police Service practice</li> <li>• Ensure the Stratford Police Service follows municipal by-laws and policies regarding purchasing</li> <li>• Ensure Stratford Police Service members are trained to meet this standard</li> </ul> | Yes |
| 4 | <p><b><i>Self Service Kiosks</i></b><br/> Accessibility features are to be incorporated into the design, procurement, or acquisition of self-service kiosks.</p>   | 6 | January 1, 2015 | <ul style="list-style-type: none"> <li>• Incorporate this standard as applicable</li> <li>• Ensure Stratford Police Service members are trained on this standard</li> </ul>  | Yes |
| 5 | <p><b><i>Training</i></b><br/> Training on the <i>Human Rights Code</i> as it pertains to persons with disabilities, in addition to training on the requirements of the accessibility standards set out in the <i>Integrated Accessibility Standards</i> regulation, is to be provided to all employees, volunteers, participants in policy development, and all others who provide goods, services or facilities on behalf of the organization as soon as is practicable and as appropriate to their duties. A record of the training, including the dates and number of individuals to whom such training has been provided is to be kept.</p> | 7 | January 1, 2014 | <ul style="list-style-type: none"> <li>• Training materials developed</li> <li>• Training provided to all required parties</li> <li>• Records of the training maintained</li> </ul>  | Yes |

**Part II – Information and Communication Standards**

Note: if it is determined by the Stratford Police Service that any information or communications are unconvertible (cannot be converted into another format), a person requesting converted information or communication shall be provided with an explanation as to why the information or communication is unconvertible, as well as a summary of that information or communication.

| <b>Item</b> | <b>Standard</b>  | <b>Section</b> | <b>Compliance</b> | <b>Action</b>  | <b>Compliant?</b> |
|-------------|--|----------------|-------------------|--|-------------------|
| 1           | <p><b><i>Feedback Process</i></b><br/> Feedback processes must be provided in accessible formats and/or with communication supports upon request. The public must be notified of the availability of such formats and supports.</p>  | 11             | January 1, 2014   | <ul style="list-style-type: none"> <li>Review feedback processes to ensure accessibility</li> <li>Provide public notice of the availability of accessible formats and communication supports on the Stratford Police Service website and other locations as appropriate</li> </ul> | Ongoing           |
| 2           | <p><b><i>Accessible Formats and Communication Supports</i></b><br/> When a member of the public requests for the provision of or arrangements for accessible formats and communication supports, these formats/supports must be provided in a timely manner taking into account the disabled person’s accessibility needs at a cost not exceeding the regular cost charged to others. Consultation must be undertaken with the requestor as to the suitability of an accessible format or communication support.</p> | 12             | January 1, 2015   | <ul style="list-style-type: none"> <li>Stratford Police Service members trained on this requirement</li> <li>Be prepared to consult with requestors and provide accessible formats and supports as necessary</li> </ul>  | Yes               |
| 3           | <p><b><i>Emergency Procedures, Plans or Public Safety Information</i></b><br/> Any emergency procedures, plans, or public safety information made available to the public must be made available in an accessible format and/or with communication supports as soon as practicable upon request.</p>   | 13             | January 1, 2012   | <ul style="list-style-type: none"> <li>Stratford Police Service members trained on this requirement</li> <li>Be prepared to consult with requestors and provide accessible formats and supports as necessary</li> </ul>  | Yes               |

|   |   |    |                 |   |         |
|---|---|----|-----------------|---|---------|
| 4 | <b>Accessible Websites and Web Content (part 1)</b><br>New internet websites and web content are to conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A. | 14 | January 1, 2014 | <ul style="list-style-type: none"> <li>• Procure the necessary resources to meet this requirement</li> <li>• Ensure new sites and postings conform to the guidelines</li> </ul>                   | Ongoing |
| 5 | <b>Accessible Websites and Web Content (part 2)</b><br>By January 1, 2021, all internet websites and web content must conform to WCAG 2.0 Level AA except where not practicable.                      | 14 | January 1, 2021 | <ul style="list-style-type: none"> <li>• Procure the necessary resources to meet this requirement</li> <li>• Ensure all sites and postings conform to the guidelines where practicable</li> </ul> | No      |

### **Part III – Employment Accessibility Standards**

Note: these standards apply to the employment of individuals and not to volunteers or other unpaid individuals

| <b>Item</b> | <b>Standard</b>   | <b>Section</b> | <b>Compliance</b> | <b>Action</b>  | <b>Compliant?</b> |
|-------------|---|----------------|-------------------|--|-------------------|
| 1           | <b>General Recruitment</b><br>All employers must notify employees and the public about the availability of accommodation in the recruitment process.  | 22             | January 1, 2012   | <ul style="list-style-type: none"> <li>• Such notice is added to internal Stratford Police Service job postings</li> <li>• Such notice is place on the Stratford Police Service “Careers” webpage</li> </ul> | Yes               |
| 2           | <b>Recruitment, Assessment or Selection Process</b><br>All employers must notify job applicants that accommodation is available upon request relative to the materials or processes to be used. Employers must consult with selected applicants who request an accommodation and provide or arrange for suitable accommodation. | 23             | January 1, 2012   | <ul style="list-style-type: none"> <li>• These requirements are built into internal and external hiring processes</li> </ul>   | Yes               |
| 3           | <b>Notice to Successful Applicants</b><br>When making offers of employment, policies for accommodating persons with disabilities must accompany such offers.  | 24             | January 1, 2012   | <ul style="list-style-type: none"> <li>• Relevant policies are added to materials provided to new employees</li> </ul>   | Yes               |

|   |   |    |                 |   |     |
|---|---|----|-----------------|---|-----|
| 4 | <p><b>Informing Employees of Supports</b><br/>Employers must inform employees about organizational policies to support employees with disabilities, as well as information on accommodation.</p>  | 25 | January 1, 2012 | <ul style="list-style-type: none"> <li>• Notice of these policies are provided to all Stratford Police Service members</li> <li>• Policies include information about accommodation for members</li> </ul> | Yes |
| 5 | <p><b>Accessible Formats and Communication Supports</b><br/>Where requested by a disabled employee, the employer must consult with the employee to provide accessible formats and communication supports for information needed by the employee to perform his or her job.</p>  | 26 | January 1, 2012 | <ul style="list-style-type: none"> <li>• Be prepared to consult with employees and provide accessible formats and supports as necessary</li> </ul>  | Yes |
| 6 | <p><b>Workplace Emergency Response Information</b><br/>Employers must provide individualized workplace emergency response information to disabled employees if necessary based on the type of disability if the employer is aware of the need for accommodation, and such information may be shared with a person designated by the employer to provide assistance to the disabled employee if the employee consents. The emergency response information must be reviewed each time the disabled employee moves locations within the organization or has overall accommodation needs or plans reviewed.</p> | 27 | January 1, 2012 | <ul style="list-style-type: none"> <li>• Provide information to employees and designated persons as required</li> <li>• Review this information as necessary</li> </ul>                                   | Yes |
| 7 | <p><b>Individual Accommodation Plans</b><br/>Pursuant to section 28(2) and 28(3) of the Regulation, employers shall have in place a written process for developing individual accommodation plans for employees with disabilities.</p>  | 28 | January 1, 2014 | <ul style="list-style-type: none"> <li>• Incorporate these requirements into the Stratford Police Service Accessibility and Accommodation General Order</li> </ul>  | Yes |

|   |  |                |                 |   |     |
|---|--|----------------|-----------------|---|-----|
| 8 | <p><b>Return to Work Process</b><br/>Employers shall develop and have in place a return to work process for employees who have been absent due to a disability and who require disability related accommodations to return to work, including documentation of the process. The process shall outline the steps the employer will take to facilitate the return to work and use documented individual accommodation plans.</p> | 29             | January 1, 2014 | <ul style="list-style-type: none"> <li>• Incorporate this process/these requirements into the Stratford Police Service Accessibility and Accommodation General Order</li> </ul> | Yes |
| 9 | <p><b>Performance Management, Career Development and Advancement, and Redeployment</b><br/>Performance management, career development and advancement, and redeployment processes shall take into account the accessibility needs of employees with disabilities and individual accommodation plans.</p>   | 30<br>31<br>32 | January 1, 2014 | <ul style="list-style-type: none"> <li>• Incorporate these requirements into the Stratford Police Service Accessibility and Accommodation General Order</li> </ul>              | Yes |

**Part IV – Transportation Standards**

| <b>Item</b> | <b>Standard</b>  | <b>Section</b> | <b>Compliance</b> | <b>Action</b>  | <b>Compliant?</b> |
|-------------|--|----------------|-------------------|--|-------------------|
| 1           | <b><i>Taxicab Fees/Fares</i></b><br>Owners and operators of taxicabs are prohibited from charging additional fees or fares for persons with disabilities than that charged for other persons, including for the storage of mobility aids or devices. | 80             | July 1, 2011      | <ul style="list-style-type: none"><li>• Revise the taxicab bylaw to include these provisions</li></ul> | Yes               |
| 2           | <b><i>Taxicab Registration and Identification (part 1)</i></b><br>Taxicab owners and operators must place vehicle registration and identification information on the rear bumper of their taxicabs.  | 80             | January 1, 2012   | <ul style="list-style-type: none"><li>• Revise the taxicab bylaw to include these provisions</li></ul> | Yes               |
| 3           | <b><i>Taxicab Registration and Identification (part 2)</i></b><br>Taxicab owners and operators must make vehicle registration and identification information available in an accessible format to persons with a disability.                         | 80             | January 1, 2012   | <ul style="list-style-type: none"><li>• Revise the taxicab bylaw to include these provisions</li></ul> | Yes               |