

Accommodation Policy

This Accommodation Policy is available online on the [OIPRD website](#). For an alternative format or a paper copy, please contact the OIPRD at toll free: 1-877-411-4773, local: 416-246-7071, TTY: 1-877-414-4773, or OIPRD@ontario.ca.

1. Statement of Commitment:

The Office of the Independent Police Review Director (OIPRD) is committed to providing accommodation for all persons with identified disabilities under the Accessibility for Ontarians with Disabilities Act (AODA) and Ontario Human Rights Code (Code) in relation to services and materials provided by the OIPRD. Accommodation will be provided in accordance with the principles of dignity, inclusion, and with consideration to the needs of the individual. The OIPRD will work cooperatively, and in a spirit of respect, with all partners in the accommodation process.

The OIPRD is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA.

2. Definitions:

Section 10 (1) of the Code¹ and Part I, Section 2 of the AODA² defines “disability” as:

- a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical

reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,

- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997; (“handicap”)

Duty to accommodate: This term describes the legal obligation to address or correct situations of discrimination by providing reasonable accommodation. A duty to accommodate is part of the organization's larger duty to not discriminate. Duty to accommodate means accommodation must be provided in a manner that respects general principles such as dignity of the person, consideration to the needs of the individual, integration and full participation. Where the duty exists, it requires only that a "reasonable accommodation" be made and only to the point of "undue hardship".

Undue hardship: As defined by the Ontario Human Rights Code, organizations are required to accommodate someone with a disability to the point of undue hardship. There are only three factors to consider in assessing undue hardship: cost, outside sources of funding and health and safety requirements, if any. Evidence to demonstrate undue hardship must be objective, real, direct and, in the case of cost, quantifiable.

3. Purpose:

This policy has been developed to ensure that the services of the OIPRD are accessible to all people, including persons with disabilities, such that they can fully participate in the public complaints process. The OIPRD recognizes that an operational commitment to accommodation may require the organization “to take positive steps to ensure that

disadvantaged groups benefit equally from services offered to the general public, which is widely accepted in the human rights field.”³

4. Application:

All OIPRD staff will communicate using methods that enable persons with disabilities to request, receive, and use OIPRD materials in accessible formats. The OIPRD will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities and will notify the public about the availability of accessible formats and communications supports on the OIPRD website.

5. Requesting Accommodation:

The OIPRD shall provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person’s accessibility needs. Please note that the OIPRD does not have all types of formats or supports on hand or in stock. Some services may require additional time to secure. However, the OIPRD will keep persons updated on their specific accommodation request. Accessible and alternative formats of documents will be provided at no charge.

The OIPRD will consult with the person making the request to determine the suitability of an accessible format or communication support that is reasonable.

The OIPRD will take reasonable steps to accommodate persons with disabilities without incurring undue hardship.

If you would like to get in touch with us to request accommodation in advance of a conversation with OIPRD staff, please ask for the Accommodation Coordinator at

- Toll free: 1-877-411-4773
- Local: 416-246-7071
- TTY: 1-877-414-4773 (please ask reception to put you through)

- Mail: 655 Bay Street, 10th Floor, Toronto, Ontario, M7A 2T4
- Email: OIPRD.Accommodation@ontario.ca

Please mark the email or letter clearly as a **request for accommodation**.

Once you have requested accommodation, the Accommodation Coordinator will communicate the request to the Case Coordinator or Investigator assigned to your complaint.

6. Privacy and Confidentiality:

The OIPRD acknowledges that requests for accommodation may require the disclosure of private, sensitive, and personal information. The OIPRD will maintain the confidentiality of information related to an accommodation request, and will only disclose this information with the consent of the applicant requiring accommodation.

The OIPRD is subject to the Freedom of Information and Protection of Privacy Act (FIPPA), and must also comply with legal orders requiring the production of documents in certain circumstances.

If you are bringing a support person they may be asked to sign a confidentiality agreement and the role of the support person will need to be agreed upon in advance.

7. Examples of Accommodation:

Sign Language: The OIPRD will arrange and cover the costs for an American Sign Language (ASL) or a Langue des signes québécoise (LSQ) interpreter if required. Please give as much advanced notice as possible as arrangements for ASL/LSQ interpreters can take between two weeks to a month.

Languages: The OIPRD provides services in English and French. A complaint will be responded to in either English or French depending on the language in which it is filed. Any party who requires the assistance of an interpreter in filing a complaint in a

language other than French, English, ASL or LSQ, must arrange for an interpreter at their own expense.

Alternative formats: The OIPRD can provide documents and reports in a variety of formats upon request, such as large print, Braille, or another reasonable format.

Wheelchair Accessibility: The OIPRD ensures that its office is wheelchair accessible.

Service Animals: The OIPRD welcomes service animals. When we cannot easily identify that an animal is a service animal, our staff may ask a person to provide documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

Support Person: If you need to bring a support person with you, you do not have to tell us why they have to be with you, just something to indicate that “I need this person with me for support.”

Enclosed Spaces: If you have a disability that makes it very difficult to be in a closed room, you do not have to tell us about your condition. However, please be specific about your preferences e.g. “I would like to be in a larger room with the door open.”

Speech: If you have a disability that makes it difficult for you to understand speech, please note the following options:

- Bring a support person with you (they may need to sign a confidentiality agreement)
- Ask the OIPRD employee to speak slowly
- Ask the OIPRD employee or your support person to write down some key points to take with you

Reading: If you have a disability that makes it difficult for you to read or understand printed materials, you can ask to have documents read and explained to you by the Accommodation Coordinator.

Organizational Difficulties: If organizational difficulties are part of your disability you can ask for help putting your documents together in an order that would assist you.

Alternative Formats and Assistive Devices: The OIPRD offers a number of alternative formats to contact us including phone, email, and TTY service. If necessary, alternate service methods may also be made available to accommodate individual needs.

Please note this list is not exhaustive and reasonable accommodations will be considered individually on a case-by-case basis.

8. Training:

OIPRD staff receives ongoing training regarding diversity, inclusion, and accessibility. This training includes information about accommodating persons with disabilities, the importance of embracing diversity, as well as inclusive practices, to ensure staff understand requirements under the AODA.

9. Notice of Temporary Disruptions to Service

Disruptions to normal service will be posted, including details of alternative service options in the following method/places:

- Notices on entrance doors
- Telephone automated voice recordings
- Website

In the event of any unplanned disruption, alternate arrangements will be made to accommodate persons with disabilities to receive services at an alternate place and time or format.

10. Commitment to Anti-Ableism:

The OIPRD strives to create an inclusive workplace and service environment that welcomes and supports differences and diversity in its staff, and the community it serves.

This includes:

1. Ensuring that practices and communications in the workplace and in delivering service to the community do not reflect or perpetuate ableist or exclusionary perspectives that may directly or indirectly promote, sustain, or entrench differential treatment affecting persons with disabilities
2. Establishing and maintaining hiring, promotion and work-related policies that will build and support an inclusive employment environment where individuals with disabilities can participate and contribute fully
3. Ensuring that services to individuals with disabilities are provided in a fully respectful manner that addresses and removes any barriers to service, including ableist practices or attitudes

The OIPRD shall:

1. Maintain and enforce the OIPRD's Accommodation Policy
2. Ensure that the Accommodation Policy and the Anti-Ableism Statement of Commitment are available to the public on the OIPRD's website
3. Include the accommodation policy and Multi-Year Accessibility Plan in orientation materials for all new staff members
4. Provide training to staff on issues relating to access, accommodation, and ableism on a regular, ongoing basis
5. Give every complainant an opportunity to provide feedback on whether service was provided in a responsive and fully respectful way and whether their needs related to disability were appropriately accommodated as service was provided
6. Annually review client feedback on anti-ableist service delivery and on accommodation of disability
7. Conduct an annual survey of staff that includes the opportunity to comment on accommodation of disability-related needs in the workplace, and on compliance with this policy

11. Anti-Ableism Statement of Commitment

The purpose of this statement is to recognize the OIPRD's commitment to a proactive approach in providing an inclusive workplace and service environment for persons with disabilities.

"Ableism" is a term used to describe the discriminatory communications, actions, and practices against persons with disabilities. Ableism may be individual or systemic depending on the type of discriminatory process.

This statement of commitment is supplemental to the OIPRD's Accommodation Policy and commits the OIPRD to addressing differential attitudes towards persons with disabilities in communications, policies and practices in the workplace, and the delivery of service.



In committing to anti-ableism in the workplace and in service delivery, the OIPRD recognizes that individuals with disabilities can offer the best information about their disability-related needs, if any.

12. Feedback process

The OIPRD welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers, respond to concerns, and improve how we deliver services to Ontario's diverse population.

Please provide feedback in the following ways:

Email: OIPRD.Accommodation@ontario.ca

Toll-free phone: 1-877-411-4773

Local phone: 416-246-7071

TTY: 1-877-414-4773

Toll-free fax: 1-877-415-4773

Local fax: 416-327-8332

The OIPRD will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

13. Contact Information:

Accommodation Coordinator

Office of the Independent Police Review Director

655 Bay Street, 10th Floor

Toronto, Ontario

M7A 2T4

Toll-free phone: 1-877-411-4773

Local phone: 416-246-7071

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¹ Ontario Human Rights Code: www.elaws.gov.on.ca/html/statutes/english/elaws_statutes_90h19_e.htm

² Accessibility for Ontarians with Disabilities Act:

www.elaws.gov.on.ca/html/source/regs/english/2011/elaws_src_regs_r11191_e.htm

³ Eldridge v. British Columbia (Attorney General), [1997] 3 S.C.R. 624 at para. 78 <https://scc-csc.lexum.com/scc-csc/scc-csc/fr/item/1552/index.do>.