# 2022-2025 Multi-Year Accessibility Plan

Accessibility for Ontarians with Disabilities Act

## REVISION UPDATES:

| **YEAR** | **CHANGES** |
| --- | --- |
| 2014 | Posted DateAccessibility Policy AdoptedCustomer Service Policy RevisedCanadian Hearing Society Service Agreement June 2014 |
| 2015 | Board Update December 8, 2015Initiatives Tables Updated |
| 2016 | Board Report December 8, 2016Initiatives Tables UpdatedCustomer Service Policy RevisedAccessibility Policy Revised |
| 2017 | Board Report December 11, 2017Initiatives Tables Updated |
| 2018 | Initiatives Tables Updated |
| 2019 | Board Report November 13, 2019Initiatives Tables Updated |
| 2020 | Board Report December 2, 2020Initiatives Tables Updated |
| 2021 | Board Report December 2021Initiatives Tables Updated |
| 2022 | Board Report January 18, 2023Initiatives Tables Updated |

The Greater Sudbury Police Service’s “2022-2025 Multi-Year Accessibility Plan”, under the *Accessibility for Ontarians with Disabilities Act,* outlines our Service’s priorities for accessibility which align with our Vision, Mission, and Values as well as sets the standard of the provision of our services to persons with disabilities.

## Vision

We ensure community safety and well-being through collaborative partnerships, innovation, and community engagement.

## Mission

Ensuring a culture of trust through professional service while empowering our community to enhance safety.

## Values

Proudly, we pursue our vision while living our **"RICH"** values:

**R**espect = our actions demonstrate our mutual respect for the community and each other.

**I**nclusivity = we value the unique qualities of our members and communities by promoting an inclusive environment guided by fairness, respect, equity, and dignity.

**C**ourage = we are committed to serving with distinction and pride for justice.

**H**onesty = we are professional, open, fair, and accountable; ethically performing our duties with integrity and trust.

Table of Contents

[2014-2021 Multi-Year Accessibility Plan 0](#_Toc91670980)

[REVISION UPDATES: 1](#_Toc91670981)

[Vision 2](#_Toc91670982)

[Mission 2](#_Toc91670983)

[Values 2](#_Toc91670984)

[Table of Contents 3](#_Toc91670985)

[Message from the Command Team: 4](#_Toc91670986)

[Greater Sudbury Police Service- Accessibility Policies 4](#_Toc91670987)

[Authentic Inclusion Team 5](#_Toc91670988)

[The City of Greater Sudbury 5](#_Toc91670989)

[The Greater Sudbury Police Service 5](#_Toc91670990)

[Greater Sudbury Police Services Board 6](#_Toc91670991)

[Monitoring/ Evaluating 6](#_Toc91670992)

[Accessibility for Ontarians with Disabilities Act 6](#_Toc91670993)

[Definitions 7](#_Toc91670994)

[Proactive Initiatives 9](#_Toc91670995)

[Multi-Year Plan 19](#_Toc91670996)

[Part 1: Customer Service; Ontario Regulation 429/07 20](#_Toc91670997)

[Part 2: General Requirements; Ontario Regulation 191/11 23](#_Toc91670998)

[Part 3: Information and Communication; Ontario Regulation 191/11 24](#_Toc91670999)

[Part 4: Employment Standards; Ontario Regulation 191/11 25](#_Toc91671000)

[Part 5: Transportation 28](#_Toc91671001)

[Part 6: Built Environment 28](#_Toc91671002)

[Conclusion 28](#_Toc91671003)

## Message from the Command Team:

The Greater Sudbury Police Service proudly serves our community to ensure the safety and security of residents and business partners. Our organizational values demonstrate our mutual respect for the community and each other. We value the unique qualities of our members and communities by promoting an inclusive environment guided by fairness, respect, equity, and dignity.

Due to the increase of public awareness surrounding disabilities and the subsequent decrease of the stigma associated with disclosing disabilities, in addition to an aging population, the number of persons with disabilities is expected to grow. We are dedicated to providing equitable access to programs, service goods, and facilities based on the principles of dignity, independence, fairness, and inclusivity to all citizens of the City of Greater Sudbury. While this plan is designed to strive for services that are accessible for persons with disabilities, the outcomes benefit all community members.

In our pursuit of open, fair, and accountable policing, we will continue to identify, prevent, and remove barriers to access services. We invite feedback from the community and our members on how we are meeting your needs and what we can do to improve our performance.

Chief of Police Paul Pedersen

Deputy Chief of Police Sara Cunningham

Chief Administrative Officer Sharon Baiden

## Greater Sudbury Police Service- Accessibility Policies

* The Greater Sudbury Police Services Board and the Greater Sudbury Police Service are committed to meeting the accessibility needs of people with disabilities in a timely and proactive manner and will use reasonable efforts to provide equitable access to programs, services, goods, and facilities provided by the Board and the Service that respects a person’s dignity and independence.
* The Greater Sudbury Police Services Board and the Greater Sudbury Police Service are dedicated to providing quality customer service. All members, volunteers, agents, and persons working on behalf of the Greater Sudbury Police Service shall provide services and assistance in a manner that respects the dignity, independence, integration, and equality of opportunity of persons with disabilities.
* The Greater Sudbury Police Services Board shall ensure that all its public meetings, functions, workshops, and community events are held in locations that are accessible for people with disabilities and that a person with a disability shall be allowed to utilize assistive devices or be accompanied by a guide dog, service animal, or support person when attending such events.
* The Greater Sudbury Police Services Board and the Greater Sudbury Police Service will establish basic principles for achieving and maintaining accessibility by meeting the legislative requirements of *Ontario Regulation 429/07* and *Ontario Regulation 191/11*.

## Authentic Inclusion Team

The accessibility initiatives conducted by our Service will belong to the portfolio of the Greater Sudbury Police Service’s Authentic Inclusion Team. Our internal activities around respect in an environment where diversity and inclusiveness are integrated in the day-to-day operations of our business. Our team is committed to community outreach, training our members, and appreciating and promoting an environment free of discrimination and harassment.

## The City of Greater Sudbury

Centrally located in Northeastern Ontario, the City of Greater Sudbury is composed of a rich mix of urban, suburban, rural and wilderness environments. It is a vast territory whose historic settlement patterns have grown into communities which are spread across the Sudbury Basin.

The City of Greater Sudbury is 3,267 square kilometers in area, making it the geographically largest municipality in Ontario and the second largest in Canada with a low population density relative to its size. The municipality provides a broad range of services across a geography that is many times larger than most Southern Ontario municipalities. This presents unique challenges, some of which impact accessibility, particularly when it comes to movement and transportation as well as community-based access to services.

The City of Greater Sudbury is a multicultural and truly bilingual community with more than a quarter of its residents having French as their mother tongue and this is always considered when implementing information and communications strategies in support of accessibility.

In addition to being home to 160,275 citizens, the City of Greater Sudbury is a regional centre for financial and business services, tourism, health care and research, education, and government. Many of the half million residents of Northeastern Ontario from the Quebec border to the eastern shore of Lake Superior and from the James and Hudson’s Bay coastlines to the Georgian Bay area travel to Sudbury and use services as varied as our transportation and medical systems.

## The Greater Sudbury Police Service

The Greater Sudbury Police Service (GSPS) serves over the 160,000 residents in the City of Greater Sudbury. The Service is comprised of two main service delivery districts, with several units and numerous different positions to respond to the very different needs and expectations of the communities within this large municipal boundary. The service operates primarily through two operational sites, police main headquarters operates out of the downtown core and a secondary district #2 operates out of Azilda. Administrative services section also operates out of the downtown core. The Service has an authorized strength of 272 sworn, 130 civilians and approximately 10 auxiliary officers. Staffing is supplemented with part time civilian staff members as well. In addition, the Service has several volunteers who assist with our work. In 2022, the Service operates on a net budget of just over $69,000,000.

## Greater Sudbury Police Services Board

The Police Services Board is the civilian body governing the Greater Sudbury Police Service. The Board is responsible for the police budget, overseeing the Chief of Police, and is the employer for the members of the police service. The authority of the Board is established by Section 31 of the *Ontario Police Services Act*. The Greater Sudbury Police Services Board is composed of five members: two Provincial appointees, two Municipal Council appointees, and one community representative as appointed by Municipal Council. The Board recognizes the challenges involved in law enforcement created by changing environments, demographic shifts, emerging technologies, and evolving crime trends and patterns. They utilize their knowledge to provide direction and guidance to the Greater Sudbury Police Service to ensure adequate and effective police services are provided in accordance with the needs of the municipality. As civilian community members who represent the public's interests, the Police Services Board is committed to a high quality of community-based policing and excellence in police governance.

## Monitoring/ Evaluating

Through our commitment to the City of Greater Sudbury and continuous improvement, the Multi-Year Accessibility Plan is monitored and evaluated annually.

In response to ever changing needs, the plan is revised and updated.

## Accessibility for Ontarians with Disabilities Act

Section 1 of the *Ontario Human Rights Code* states that “Every person has a right to equal treatment with respect to services, goods and facilities, without discrimination because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status or disability”. In June 2005, the Accessibility for Ontarians with Disabilities Act became law to specifically address the prevention of barriers for people with disabilities to ensure they had equal access to goods, services, and facilities.

Persons with disabilities represent a significant and growing part of the population. As seen in the chart below, according to Statistics Canada and the Persons and Activity Limitation Survey (PALS), approximately 1.85 million people in Ontario live with a disability, representing 15.5% of Ontario’s population. It is estimated that there are approximately 25,037 citizens with disabilities currently living in the City of Greater Sudbury (CGS).

| Population PALS Prevalence of CGS Population Estimate of CGSDisability as % of Population with aPopulation - Ontario Disability |
| --- |
| Total population 15.5 (2011) 160275 24,843 |
| Total population 15.5 (2020) 161531 25,037 |

Accessibility issues are not limited to community members who have a disability. Improving accessibility will also positively impact other facets of society, including seniors, parents, friends, and families of persons with disabilities. *Accessibility for Ontarians with a Disability Act* (AODA) was passed in 2005 with a goal of enhancing accessibility in the province by developing, implementing, and enforcing accessibility standards to achieve accessibility for Ontarians with disabilities regarding goods, services, facilities, information, accommodation, employment, buildings, structures and premises on or before January 2025.

The *AODA* is a law that allows the government to develop and enforce specific standards of accessibility. The standards are made into laws called “Regulations”, which provide detail to organizations on how to achieve accessibility at their place of employment. To date, the *AODA* includes *Ontario Regulation 191/11* and *Ontario Regulation 429/07.*

The Accessibility Standards for Customer Service, *Ontario Regulation 429/07*, became law on January 1, 2008, and was the first of five sets of standards to be issued by the Provincial Government in support of the *AODA*. The Regulation establishes accessibility standards for customer service and applies to every designated public sector organization, and to every other person or organization that has at least one employee in Ontario that provides goods or services to members of the public or other third parties.

The Integrated Accessibility Standards, *Ontario Regulation 191/11*, became law on July 1, 2011, and was the second Regulation under the *AODA* comprising of three standards: Information and Communications, Employment Standards, and Transportation. On December 17, 2012, *Ontario Regulation 413/12* amended the Integrated Accessibility Standards Regulation to incorporate the Built Environment Standards.

All organizations, in both the private and public sector with one or more employees must meet all requirements set out under the Regulations to achieve the goal of creating an Accessible Ontario by the year 2025.

## Definitions

**ACESSIBLE FORMATS:**

Means accessible formats that may include, but are not limited to, large print, recorded audio, electronic formats, braille, and other formats usable by persons with disabilities.

**ACCESSIBILITY PLAN:**

Means a multi-year plan approved by the Greater Sudbury Police Services Board and made available to the public that outlines the Service’s strategy to prevent and remove barriers to meet the requirements under the *AODA*.

**AODA:**

*AODA* means the *Accessibility for Ontarians with Disabilities Act.*

**ASSISTIVE DEVICE:**

Means a technical aid, communication device or medical aid that is used to increase, maintain or improve the functional abilities of people with disabilities. Assistive Devices include, but are not limited to; wheelchairs, walkers, canes, oxygen tanks, hearing aids, etc.

**BARRIER:**

Means anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including physical, architectural, information and communications, attitudinal, technological and organizational barriers.

(a) Physical and architectural barriers are features of buildings or spaces that cause problems for persons with disabilities

(b) Information and Communication barriers arise when a person cannot easily understand information

(c) Attitudinal barriers are those assumptions and actions that discriminate against persons with disabilities

(d) Technological barriers occur when a technology is not designed to support various assistive devices

(e) Organizational barriers are an organization's policies, practices or procedures that discriminate against people with disabilities

**COMMUNICATIONS:**

Means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.

**COMMUNICATIONS SUPPORTS:**

Means communications supports that may include, but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communication.

**DIGNITY**:

Means service is provided in a way that allows the person with a disability to maintain self-respect and receive respect from others.

**DISABILITY:**

Means

(a) Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance of a guide dog or other animal or on a wheelchair or other remedial appliance or device,

(b) A condition of mental impairment or 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*.

**INFORMATION:**

Means data, facts and knowledge that exist in any format, including text, audio, digital or images that conveys meaning.

**EQUAL OPPORTUNITY:**

Means service is provided to a person with a disability in such a way that they can access goods and services equal to that given to others.

**GUIDE DOG**:

Means a guide dog as defined in the *Blind Persons Rights Act*: a dog trained as a guide for a blind person, having qualifications prescribed by the Regulations.

**INDEPENDENCE:**

Means when a person with a disability can do things on their own without unnecessary assistance or interference from others.

**INTEGRATION:**

Means service is provided in a way that allows persons with disabilities to benefit from the same services, in the same place and in the same or similar manner as other customers unless an alternate measure is necessary to enable a person with a disability to access goods or services.

**KIOSK:**

Means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products, or both.

**SERVICE ANIMAL:**

Means an animal used by a person with a disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

**SUPPORT PERSON:**

Means, in relation to a person with a disability, another person who accompanies him or her to help with communication, mobility, personal care or medical needs or with access to goods or services.

**UNCONVERTIBLE:**

Means information or communications that are unconvertible due to the infeasibility of converting the information or communications.

## Proactive Initiatives

The Greater Sudbury Police Service has a long-standing history of addressing the needs of disabled persons through a variety of measures. Numerous long standing Service Procedures, as amended from time to time, include the provision of policing services to persons with disabilities:

* Prisoner Care and Control
* Prisoner Transportation
* Missing Persons
* Elder and Vulnerable Adult Abuse
* Search of Persons
* Police Response to Persons who are Emotionally Disturbed or have a Mental Illness or Developmental Disability
* Equal Opportunity
* Hate/Bias Motivated Crime/Hate Propaganda
* Sexual Assault Investigations

Additionally, several initiatives and educational topics have been implemented to enhance our Service delivery to persons with disabilities, they can be summarized in the chart below:

| **YEAR** | **INITIATIVES** |
| --- | --- |
| 1985 | * Acquired and installed a Teletypewriter (TTY) for use by hearing or speech impaired individuals. *(The TTY number is published in the telephone book and on the Service’s Website)*
 |
| 2003 | * Provided Sensitivity Training “The Police and the Disabled” to all sworn personnel which included:
	+ Sensitivity and awareness issues regarding persons with disabilities
	+ Awareness of the different persons with disabilities we may encounter
	+ The application of proper control and approach techniques when dealing with persons with disabilities
 |
| 2004 | * Purchased two wheelchairs – one standard and one transport chair to be utilized for persons in custody with disabilities, if required
* Modified public washroom to convert it to a barrier free environment
 |
| 2006 | * Developed a protocol with the Canadian Hearing Society for the provision of interpreters, when required
* Implemented a Diabetic Food Cabinet for persons in custody with diabetes
* Installed an automatic door opener on main door to HQ facility elevators
* Installed an automatic door opener on entrance door to the secure area on the Administrative (5th) Floor
* Amended Prisoner Care and Control Procedure (ADM002) to update procedures for dealing with prisoners with disabilities and the provision of diabetic meals
 |
| 2007 | * Implemented Workplace Accommodation Procedure (HR010)
* Implemented Bias Free Policing Procedure (ADM026)
* Provided Bias Free Policing Training to all sworn members
* Implemented Workplace Discrimination and Harassment Procedure (OHS015)
* Developed an Individual Fire Safety/Evacuation Plan for a disabled intern student
 |
| 2008 | * Provided training to members on visually impaired individuals by the Canadian National Institute for the Blind (CNIB)
* Implemented Equal Opportunity Procedure (HR021)
* Provided training to members by the Alzheimer’s Society
 |
| 2009 | * Provided training to members in partnership with the Independence Centre and Network (ICAN) on working with persons with physical disabilities
* Altered the procurement process to include accessibility in accordance with the *AODA*
 |
| 2010 | * Provided training to members on:
* Police and people with physical disabilities
* Mental Health and Addictions
* AODA Accessibility Standards for Customer Service
* Implemented new Income Protection Plan and associated accommodation services through Manulife
* Amended Non-Occupational Illnesses/Injuries, Absences From Work And Attendance Management Procedure (HR001) accordingly
* Adopted Board Policy GSPSB – POLICY 010 in relation to Workplace Violence and Harassment
 |
| 2011 | * Implemented Autism Registry
* Adopted Board Policy GSPSB – POLICY 021 in relation to Accessible Customer Service
* Updated the Corporate Website to include information on Accessibility to comply with the Accessible Customer Service Standards
 |
| 2012 | * Provided training to members on Mental Health and Addictions
* Implemented Accessible Customer Service Procedure (ADM006)
 |
| 2013 | * Established an account with Lockerby Taxi for transportation of disabled prisoner when required
* Amended Prisoner Transportation Procedure (ADM025) accordingly
 |
| 2014 | * Provided training to members on Mental Health Communication and Awareness
* Retained Acclaim Disability Management Services to manage member accommodation needs
* Amended Non-Occupational Illnesses/Injuries, Absences from Work And Attendance Management Procedure (HR001) accordingly
* Presented Board Policy GSPSB – POLICY 026 in relation to Accessibility to the Board
* Presented amended Board Policy GSPSB – POLICY 021 to the Board
* Provided training to Senior Command/Inclusion Team on *O. Reg 191/11* Integrated Accessibility Standards
* Provided training to designated members on Website Content Management to ensure compliance with the Regulation
* The City of Greater Sudbury’s Purchasing By-Law, which governs the Police Service, was amended to include accessibility statements
	+ *“In accordance with the OADA, the City will have regard to the accessibility for persons with disabilities in respect of Goods, Services or Construction purchased by the City”*
	+ *“The City and all Suppliers who provide Goods, Services or Construction to the City shall comply with the AODA”*
 |
| 2015 | * Developed and implemented a Corporate Services Division S.O.P outlining the procedure involving “Notifying the Public of a Planned/Unplanned Temporary Disruption.”
* Provided AODA Customer Service Training for all new members and volunteers.
* Updated training records to determine which employees still require AODA Customer Service Training.
* Developed and implemented a Corporate Services Division S.O.P outlining the procedure for “Receiving Feedback from the Public” and continued to review customer feedback and take appropriate action.
* Implemented a revised Accessibility Policy 026 that addresses all the new requirements under the Integrated Accessibility Standards Ontario Regulation 191/11. In addition, this policy was made available to the public upon request.
* Developed a 2014-2021 Multi-Year Accessibility Plan that was made available to the public on the Service’s website, or in an accessible format upon request.
* Continued our ongoing commitment to In-Service Sensitivity and Awareness Training by providing our members with “Road to Mental Readiness Training.”
* Added additional resources for our members in our “Accessibility” folder including:
* A large print library - containing accessibility documents available to the public in 16pt, 16pt, and 20pt font
* Purchased software to allow us to develop a Support Library of accessibility documents for the public in alternative formats – including audio and large print documents.
* Developed and implemented a Corporate Services Division S.O.P outlining the procedure for “Providing Alternative Formats to Customers.”
* Edited all Greater Sudbury Police Service YouTube videos available to the public to include closed captioning features.
* Participated in the YELLOWCARD Campaign for Special Olympics to end the use of the R-Word in everyday conversation.
* Continued to notify employees and the public about the availability of accommodations for applicants with disabilities in the recruitment process on our job postings and on the Greater Sudbury Police Service website
* Continued to have individuals selected to participate in the assessment or recruitment process to complete a Performance Declaration to provide or arrange for suitable accommodations, as required.
* Continued to notify successful applicants of our policies for accommodating employees with disabilities
* Provided information regarding the provision of job accommodations during the Human Resources Orientation Program
* Continued to provide employees who have informed Human Resources of their personal disability a “Employee Workplace Emergency Response Plan”
* In conjunction with Acclaim Disability Management Services, we have continued to:
* Develop individual accommodation plans for employees with disabilities
* Develop, document, and implement return to work processes for employees who have been absent from work due to a disability and require disability-required accommodations
* Continued to institute the same practices and provisions as we use with external applicants, when members compete in the Promotional Competition Process or when being redeployed
 |
| 2016 | * Provided AODA Customer Service Training for all new members and volunteers.
* Training to a total of 53 new volunteers, students, and new employees.
* Continue to review customer feedback and take appropriate action.
* Feedback has been very favourable and Customer Service staff continue to hear that the public is pleased with the services available
* spare prescription eyeglasses and are available at the counter for public use
* staff offer to verbally assist members who identify with literacy disabilities
* larger print documents are available on request
* Additional resources available to our members in our ‘Accessibility’ folder including:
* A large print library containing accessibility documents available to the public in 16pt, 16pt, and 20pt font
* Audio formats library containing accessibility documents available to the public in audio format
* In progress: all training records have been updated in the Service’s OSL system.
* Implementation a Corporate Services Division S.O.P outlining the procedure for “Providing Alternative Formats to Customers.”
* Edited all Greater Sudbury Police Service YouTube videos available to the public to include closed captioning features. 2016 6,414 views, 301 used closed captioning
* Continued notification to employees and the public about the availability of accommodations for applicants with disabilities in the recruitment process on our job postings and on the Greater Sudbury Police Service website
* Continued to have individuals participating in the assessment or recruitment process to complete a Performance Declaration to provide or arrange for suitable accommodations as required.
* Continued notification to successful applicants of our policies for accommodating employees with disabilities
* Provided information regarding the provision of job accommodations during the Human Resources Orientation Program
* Continued the provision of an ‘Employee Workplace Emergency Response Plan’ to those employees who have informed Human Resources of their personal disability
* In conjunction with Acclaim Disability Management Services, progress has continued to:
* Develop individual accommodation plans for employees with disabilities
* Develop, document, and implement return to work processes for employees who have been absent from work due to a disability and require disability-required accommodations
* Continued to institute the practices and provisions used with external applicants when members compete in the Promotional Competition Process, Internal Hiring Processes, or when being redeployed
 |
| 2017 | * Provided AODA Customer Service Training for all new members and volunteers.
* New: (2017) Training to a total of 67 new volunteers, students, and new employees.
* (2016) Training to a total of 53 new volunteers, students, and new employees.
* Continue to review customer feedback and take appropriate action.
* Feedback has been very favourable and Customer Service staff continue to hear that the public is pleased with the services available
* A supply of prescription eyeglasses and are available at the counter for public use
* Staff offer to verbally assist members who identify with literacy disabilities. Staff have received and assisted over 15 requests this year.
* Larger print documents are available on request
* Additional resources were made available to our members in our on-line ‘Accessibility’ folder including:
* A large print library containing accessibility documents available to the public in 16pt, 16pt, and 20pt font
* Audio formats library containing accessibility documents available to the public in audio format
* Provided AODA Integrated Accessibility Standards Training for all new members and volunteers.
* Training to a total of 53 new volunteers, students, and new employees.
* Implementation a Corporate Services Division S.O.P outlining the procedure for “Providing Alternative Formats to Customers.”
* Edited all Greater Sudbury Police Service YouTube videos available to the public to include closed captioning features.
* New: (2017) Acquirement of an Ergonomic Testing Area in the Human Resources Branch to ensure we properly meet the accommodation needs of applicants with disabilities
* New (October 2017) Participated in the March of Dimes Disability Mentorship Day. Provided GSPS with the opportunity to mentor a person with a disability, in order to introduce them to employment opportunities, and the skills needed to succeed in our organization.
* Continued notification to employees and the public about the availability of accommodations for applicants with disabilities in the recruitment process on our job postings and on the Greater Sudbury Police Service website
* Continued to have individuals participating in the assessment or recruitment process to complete a Performance Declaration to provide or arrange for suitable accommodations as required.
* Continued notification to successful applicants of our policies for accommodating employees with disabilities
* Provided information regarding the provision of job accommodations during the Human Resources Orientation Program
* Continued the provision of an ‘Employee Workplace Emergency Response Plan’ to those employees who have informed Human Resources of their personal disability. This has also been added to the Return-to-Work process should a member need an Employee Workplace Emergency Response Plan.
* 2017- One member identified a need to have a specific workplace emergency response plan.
* In conjunction with Acclaim Disability Management Services, progress has continued to:
* Develop individual accommodation plans for employees with disabilities
* Develop, document, and implement return to work processes for employees who have been absent from work due to a disability and require disability-required accommodations
* Continued to institute the practices and provisions used with external applicants when members compete in the Promotional Competition Process, Internal Hiring Processes, or when being redeployed
 |
| 2018 | * Provided AODA Customer Service Training for all new members and volunteers.
* New: (2018) Training to a total of 89 new volunteers, students, and new employees
* Continue to review customer feedback and take appropriate action.
* Feedback has been very favourable and Customer Service staff continue to hear that the public is pleased with the services available
* A supply of prescription eyeglasses and are available at the counter for public use
* Staff offer to verbally assist members who identify with literacy disabilities. Staff have received and assisted over 20 requests this year between 2018-2019
* Larger print documents are available on request
* New: (2018-2019) Human Resources continues to utilize an Ergonomic Testing Area in the Human Resources Branch to ensure we properly meet the accommodation needs of applicants with disabilities.
* Continued notification to employees and the public about the availability of accommodations for applicants with disabilities in the recruitment process on our job postings and on the Greater Sudbury Police Service website.
* Continued to have individuals participating in the assessment or recruitment process to complete a Performance Declaration to provide or arrange for suitable accommodations as required.
* Continued notification to successful applicants of our policies for accommodating employees with disabilities
* Provided information regarding the provision of job accommodations during the Human Resources Orientation Program
* Continued the provision of an ‘Employee Workplace Emergency Response Plan’ to those employees who have informed Human Resources of their personal disability. This has also been added to the Return-to-Work process should a member need an Employee Workplace Emergency Response Plan.
 |
| 2019 | * New 2019 Human Resource Staff participated in a Webinar by the Canadian Centre for Diversity and Inclusion (CCDI) entitled “Accessibility-Navigating a World Filled with Barriers” to enhance their understanding of how to meet the needs of those with disabilities.
* Provided AODA Customer Service Training for all new members and volunteers.
* New: (2019) Training to a total of 100 new volunteers, students, and new employees.
* Implementation a Corporate Services Division S.O.P outlining the procedure for ‘Providing Alternative Formats to Customers’.
* Edited all Greater Sudbury Police Service YouTube videos available to the public to include closed captioning features.
* New (September 2019-current) Participating in the March of Dimes Disability Skills and Work Program by providing a participant 24 weeks of work experience in our Training Branch, in order to introduce them to employment opportunities, and the skills needed to succeed in our organization.
* New (2019) Created of a new Service Animal Procedure to further support members who require an accommodation that includes a Service Animal.
* New (2019) Creation of a “Do and Don’t” training video that provides members with instructions on how to interact with a member and their Service Animal.
* In conjunction with Acclaim Disability Management Services, progress has continued to:
* Develop individual accommodation plans for employees with disabilities
* Develop, document, and implement return to work processes for employees who have been absent from work due to a disability and require disability-required accommodations
* Continued to institute the practices and provisions used with external applicants when members compete in the Promotional Competition Process, Internal Hiring Processes, or when being redeployed
 |
| 2020 | * (2020) Training to a total of 50 new volunteers, students, and new employees
* New (2020) Due to COVID, Customer Service forms and application processes have now been moved to an online platform, which eases accessibility to members of the public with accessibility constraints, and those wishing not to come into public spaces due to health concerns.
* New (2020) As a result of COVID many non-essential Service Personnel were required to commence working from home. Human Resources consulted with these members, ensuring their ergonomic needs were met in their home workspaces. Documentation was created for members on how to Ergonomically Set Up a Workspace, and members who required special equipment (chairs, desks, computer equipment, keyboards) were provided this equipment.
* New (2020) Currently we have one member who has returned to work with a Service Animal. This process was conducted in accordance with our newly created Service Animal Procedure. Service members/coworkers were educated utilizing a video entitled “Do’s and Don’ts for Interacting with a Service Animal” Posters were also created to provides members with instructions on how to interact with a member and their Service Animal.
* Renovated an office building to house several administrative divisions. All undertaken to ensure AODA Building Standards compliant.
 |
| 2021 | * Training to a total of 34 new volunteers, students, and new employees
* Continued notification to employees and the public about the availability of accommodations for applicants with disabilities in the recruitment process on our job postings and on the Greater Sudbury Police Service website.
* Continued to have individuals participating in the assessment or recruitment process to complete a Performance Declaration in order to provide or arrange for suitable accommodations as required.
* Continued notification to successful applicants of our policies for accommodating employees with disabilities
* Provided information regarding the provision of job accommodations during the Human Resources Orientation Program
* Human Resources continued to consult with members working from home to ensure their ergonomic needs were met. Documentation provided and available on how to properly set up a workspace and equipment.
* In conjunction with Acclaim Disability Management Services, progress has continued to:
	+ Develop individual accommodation plans for employees with disabilities
	+ Develop, document, and implement return to work processes for employees who have been absent from work due to a disability and require disability-required accommodations
* From January to June, through a third-party contractor, all documents on the external GSPS were remedied to be compliant with AODA standards and requirements.
* Continue to use YouTube function to ensure compliance, including closes-captioned features.
* Social Media videos and “stories” now included the close-captioned features.
* In July, Human Resources, Corporate Communications, Board Administrator and the EA to the CAO and Deputy Chief participated and completed *Accessible Document Training* hosted a third by in ensure compliance for our website.
* Continued to use YouTube function to ensure compliance, including closes-captioned features.
 |
| 2022 | * Training to a total of 52 new volunteers, students, and employees
* Continued notification to employees and the public about the availability of accommodations for applicants with disabilities in the recruitment process on our job postings and on the Greater Sudbury Police Service website.
* Continued to have individuals participating in the assessment or recruitment process complete a Performance Declaration to provide or arrange for suitable accommodations as required.
* Continued notification to successful applicants of our policies for accommodating employees with disabilities
* Provided information regarding the provision of job accommodations during the Human Resources Orientation Program
* In conjunction with Acclaim Disability Management Services, progress has continued to:
	+ Develop individual accommodation plans for employees with disabilities
	+ Develop, document, and implement return to work processes for employees who have been absent from work due to a disability and require disability-required accommodations
* Continued use of accessibility functions on the Service’s Website and Social Media pages.
 |

## Multi-Year Plan

Due to our inclusive culture and proactive initiatives outlined in the “Proactive Initiatives Section”, our Service reaches a high level of compliance with the AODA Regulations. The charts below outline all Regulation requirements under the AODA and our related level of compliance. Additionally, the column “Implementation Status” describes the past work we have achieved related to the AODA and the future tasks we will work diligently to complete. Together the tables summarize our Multi-Year Plan which will be led by our Inclusion Team for the entire Service, to best serve the citizens of the City of Greater Sudbury and help make Ontario accessible by 2025.

## Part 1: Customer Service; Ontario Regulation 429/07

| **Item** | **Requirement,** **Regulation Section and Implementation Date** | **Action Required** | **Implementation Status** |
| --- | --- | --- | --- |
| 1 | Establishment of Policies, Practices and Procedures (s.3)January 1, 2010COMPLIANT | * Develop and implement policies, practices and procedures that govern the provision of goods and services to persons with disabilities
* Include policies dealing with assistive devices
* Have document of such policies, practices and procedures available upon request to the public
 | * The Greater Sudbury Police Services Board adopted Customer Service Policy GSPSB-Policy 021 December 12th, 2011, to comply with Regulation
* Section 2.d. of Policy 021 deals specifically with assistive devices
* As per the notice on the Service’s website the Policy is available to members of the public upon request
 |
| 2 | Use of Service Animals and Support Persons (s.4)January 1, 2010COMPLIANT | * Ensure persons with service animals can enter the premise(s) with service animals, unless excluded by law in which case other measures will be made available to enable the person to obtain services
* Ensure persons accompanied by a support person are permitted to enter the premise(s) together and are able to have access to each other
* Prepare one or more documents describing the policies, practices, and procedures with respect to service animals and support persons
 | * The Service has addressed the use of service animals and support persons in both its Customer Service Policy (021) section 2. f-i., as well as its Customer Service Procedure (ADM 006) in sections 8 and 9 respectively
* Service animals and support persons are also addressed in the Service’s Prisoner Care and Control Procedures (ADM002)
* As per the notice on the Service’s website Policy 021 and Procedure ADM 006 are available to members of the public upon request
 |
| 3 | Notice of Temporary Disruptions (s.5)January 1, 2010COMPLIANT | * Post notice of a temporary disruption impacting the public on the website and/or at a conspicuous place on the premise(s)
* Include: information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available in the notice
* Create a document outlining the steps that will be taken in relation to a temporary disruption; this document must be available upon request to the public
 | * The Service has addressed the Notice of Temporary Disruption regulation in both its Policy 021 section 2.j. and Procedure ADM 006 section 10
* A document outlining the steps to be taken by the Service during a temporary disruption is located in the Accessibility Folder on the Public Drive; the document is available to the public upon request
* In the event of a temporary disruption notice shall be provided to the public via news releases, the web site and postings in the main lobby
 |
| 4 | Training for Staff, etc. (s.6)January 1, 2010COMPLIANT | * Ensure that every person that deals with the public or develops procedures receives up-to-date training on the following matters:
	+ How to interact and communicate with persons with various types of disabilities, persons who use assistive devices, and persons who require assistance of a service animal or support person
	+ How to use equipment/ devices made available on the premise(s)
	+ What to do if a person with a particular type of disability is having difficulty accessing goods/services
	+ Changes to policies, practices, and procedures
* Create a training policy and a document summarizing the content and dates of training for members
* Keep records of the training completed by members
 | * Training meeting the Regulation standards was provided to all members of the Service during the year 2010
* The Service ensures all new individuals that begin representing/working for the Service complete the “Accessible Customer Service” training
* All records are maintained in members’ personnel files and on OSL
* Accessibility training has been included in the Service’s Skills Development and Training Plan
 |
| 5 | Feedback Process for Providers of Goods and Services (s.7)January 1, 2010COMPLIANT | * Establish a process for receiving and responding to feedback regarding the manner in which goods and services are provided to persons with disabilities
* Make information about the process readily available to the public; the process must allow persons to submit feedback in person, by telephone, in writing or by email
* Create a document that outlines the feedback process and specifies the actions that will be taken if a complaint is received; upon request this document must be provided to the public
 | * As per procedure ADM 006 section 11, the Service accepts feedback in a variety of formats in accordance with the regulation. All feedback is directed to the Manager of Records and Customer Services who shall review the feedback and ensure follow up and acknowledgement of receipt of the feedback is provided to the person as soon as practicable
* The Service has developed a Customer Service survey to collect feedback- accessibility questions are included in the survey
* A document describing the feedback process is located in the Accessibility Folder on the Public Drive and is available to the public upon request
 |
| 6 | Notice of Availability of Documents (s.8)January 1, 2010COMPLIANT | * Notify the public that documents required by this regulation are available upon request by posting information at a conspicuous location and on the website
 | * The Service has issued a statement on their website communicating the availability of its documents to the public
* Any requests that are made will be forwarded to the Manager of Records and Customer Service as per Procedure ADM 006 section 12
 |
| 7 | Format of Documents (s.9)January 1, 2010COMPLIANT | * Ensure documents requested by the public under this Regulation are provided in a format that considers a person’s disability by agreeing upon the appropriate format
 | * As stated in the Service’s Procedure ADM 006 section 12, all requests related to the Regulation shall be forwarded to the Manager of Records and Customer Service who shall take the appropriate action to comply with the request
 |

## Part 2: General Requirements; Ontario Regulation 191/11

| **Item** | **Requirement,****Regulation Section and Implementation Date** | **Action Required** | **Implementation Status** |
| --- | --- | --- | --- |
| 8 | Establishment of Accessibility Policies (s.3)January 1, 2013ONGOING | * Develop, implement, and maintain policies governing how accessibility will or has been achieved in relation to the requirements of the Regulation
* Include a statement of commitment to meet accessibility needs of persons with disabilities in a timely manner
* The document outlining the policies will be made available to the public, in accessible formats, upon request
 | * A new Accessibility Policy 026 shall be presented to the Greater Sudbury Police Services Board. Key features address all requirements under the Regulation
* As per the notice on the Service’s website the Policy is available to members of the public upon request.
 |
| 9 | Accessibility Plans (s.4)January 1, 2013ONGOING | * Establish, implement, maintain, and document a multi-year accessibility plan, which addresses strategies to prevent and remove barriers
* Review and update plan every 5 years, in addition to preparing an annual status report that describes the progress of the plan
* Post the multi-year plan and the annual status reports on the website, and provide both in an accessible format upon request
 | * The multi-year plan is in the process of being reviewed by the Police Services Board, Senior Command, and the Inclusion Team
* The Inclusion Team will update the plan every December in addition to annually reporting to the Board
* The Accessibility Report provided to the Board will be included in the published Annual Report by the Service
* As per item 6, notice and availability of the plan and annual status report will be conducted in the same manner
 |
| 10 | Procuring or Acquiring Goods, Services, or Facilities, etc. (s.5)January 1, 2013COMPLIANT | * Incorporate accessibility criteria and features 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 shall be provided to the public (upon request)
 | * The Service’s procurement occurs though the City of Greater Sudbury which has established Accessibility criteria within their processes of acquiring goods/services
 |
| 11 | Self-Service Kiosks (s.6)January 1, 2014COMPLIANT | * Design, procure, and acquire self-service kiosks about the accessibility for persons with disabilities
 | * The Service currently has two Cop-Logic self-service kiosks; both are accessible
* The Service will ensure that any additional kiosks that are procured to provide services to its stakeholders are equipped with accessibility features
 |
| 12 | Training (s.7)January 1, 2014ONGOING | * Train all members and volunteers on the requirements of the accessibility standards in the Integrated Accessibility Standard Regulation and on the Human Rights Code as it pertains to persons with disabilities
* Ensure training is appropriate to the duties of the employees and volunteers
* Keep training records for all individuals trained
 | * The Service has been providing In-Service Sensitivity and Awareness Training since 2005 to all members
* The Service is in the process of creating an internal training video that presents information on the requirements of the Regulation
* Training records will be kept in the same manner as described in item 4.
 |

## Part 3: Information and Communication; Ontario Regulation 191/11

| **Item** | **Requirement,****Regulation Section and Implementation Date** | **Action Required** | **Implementation Status** |
| --- | --- | --- | --- |
| 13 | Feedback (s.11)January 1, 2014COMPLIANT | * Establish a process for receiving and responding to feedback in a manner that is accessible to persons disabilities
* Notify the public about the availability of accessible formats and communication supports in the process
 | * The Service has developed a feedback process which is outlined in Procedure ADM 006 section 11
* All feedback is directed to the Manager of Records and Customer Service, who will appropriately address the feedback in a timely manner
* The Service has posted a notice on its website indicating to the public the availability of its documents in accessible formats
 |
| 14 | Accessible Formats and Communication Supports (s.12)January 1, 2015COMPLIANT | * Upon request, provide or arrange for the provision of accessible formats and communication supports, in a timely manner, that considers the requestors accessibility needs at a cost not exceeding the regular cost charged to others
* Consult with the requestor to determine the suitable accessible format or communication support
* Notify the public of the availability of such formats and supports
 | * As stated in the Service’s Procedure ADM 006 section 12- requests for documents shall be forwarded to the Manager of Records and Customer Service who is then responsible for consulting the requestors and providing the requested document in a format that considers the person’s disability
* The Service has posted a notice on its website indicating to the public the availability of its documents in accessible formats
* The Service will be providing training in the use of appropriate language when referring to people with disabilities
 |
| 15 | Emergency Procedure, Plans or Public Safety Information (s.13)January 1, 2012COMPLIANT | * Provide any emergency procedures, plans or public safety information, made available to the public in accessible formats or with appropriate communication supports upon request
 | * The Greater City of Sudbury has accessible emergency plans available on their website: <http://www.greatersudbury.ca/living/emergency-preparedness/emergency-plans/>
* All public safety material produced by the Greater Sudbury Police Service is available upon request in a format suitable to the needs of a person with a disability
 |
| 16 | Accessible Websites and Web Content WCAG 2.0 Level A (s.14)January 1, 2014ONGOING WCAG 2.0 Level AAJanuary 1, 2021COMPLIANT | * Ensure all new websites and web content meets Web Content Accessibility Guidelines (WCAG) 2.0 Level A initially: later increasing to Level AA
* Ensure all public websites and web content posted after January 1, 2021, conforms to WCAG 2.0 Level AA, other than criteria 1.2.4 (captions) and 1.2.5 (pre-recorded audio descriptions)
 | * The Service’s online provider, eSolutions, will have the upgrades to the website framework to meet Level AA compliance standards by December 15th, 2014
* Following December 15th,2014 the Service’s website will also have the necessary software tools to review page content to validate compliance
* Staff have completed training on the process of making website content compliant- this process will take place during the 2016 year
* In 2021, The Service’s online provider remedied all public documents on the external GSPS website to ensure compliance. Our external website conforms with WCAG 2.0 Level AA.
 |

## Part 4: Employment Standards; Ontario Regulation 191/11

| **Item** | **Requirement,****Regulation Section and Implementation Date** | **Action Required** | **Implementation Status** |
| --- | --- | --- | --- |
| 17 | General Recruitment (s.22)January 1, 2014COMPLIANT | * Notify employees and the public about availability of accommodation for applicants with disabilities in the recruitment process
 | * A statement is posted on the Service’s website to notify employees and the public of this standard as follows

*“Appropriate accommodations will be provided upon request throughout the hiring process as required under the Greater Sudbury Police Services Employment Accommodation Policy and the Accessibility for Ontarians with Disabilities Act (AODA).”* |
| 18 | Recruitment, Assessment or Selection process (s.23)January 1, 2014COMPLIANT | * Notify the individuals selected to participate in an assessment or recruitment process that accommodations are available upon request in relation to the materials or processes to be used
* Consult with the applicant if a request is made, to provide or arrange for the provision of a suitable accommodation(s) in a manner that considers the applicant’s accessibility needs
 | * A statement is attached to the notice indicating an individual has been chosen to compete in the selection process
* As stated in HR 010 applicants are accommodated as required during the recruitment process provided, they meet the bona-fide occupational requirements for the position
 |
| 19 | Notice to Successful Applicants (s.24)January 1, 2014COMPLIANT | * When making offers of employment, notify successful applicant of its policies for accommodating employees with disabilities
 | * A statement is included in all offers of employment as follows: *“The Greater Sudbury Police Service is committed to providing a supportive work environment. There are policies and practices in place for accommodating Employees with disabilities. Should you require a specific accommodation during your employment please advise the Human Resources Branch."*
 |
| 20 | Informing Employees of Supports (s.25)January 1, 2014COMPLIANT | * Inform employees, as soon as practicable after they begin their employment, of policies used to support employees with disabilities
* Provide updated information to employees whenever there is a change to existing policies on the provision of job accommodations that consider an employee’s accessibility needs due to disability
 | * The Human Resource Department Orientation Program provides this information to new members
* Whenever Accessibility information is updated, all members are notified via email (distribution all list) or through appropriate training
 |
| 21 | Accessible Formats and Communication Supports for Employees (s.26)January 1, 2014COMPLIANT | * Consult with the employee(s) to provide or arrange for the provision of accessible formats and communication supports, for:
	+ Information that is needed to perform the employee’s job
	+ Information that is generally available to employees in the workplace
* Consult with the employee making the request to determine the most suitable format
 | * Upon request from an employee the Service will follow the procedures explained in item 14 to ensure employees have access to information in accessible formats
 |
| 22 | Workplace Emergency Response Information (s.27)January 1, 2012COMPLIANT | * Provide individualized workplace emergency response information, as soon as practicable after becoming aware, to employees who have a disability that is necessary of such information
* If the individual requires assistance, with their consent, provide the workplace emergency response information to the person designated to provide assistance to this individual
* Review the individualized information when:
	+ The employee moves to a different location
	+ The employee’s overall accommodation needs, or plans are reviewed

Review of general emergency response policies are occurring | * To ensure a disabled member’s safety, an individual emergency response plan is developed in consultation with the member
* With the member’s consent, the plan is shared with those members who have agreed to be tasked with the responsibility of ensuring the members safety
 |
| 23 | Documented Individual Accommodation Plans (s.28)January 1, 2014COMPLIANT | * Develop a written process for the development of documented individual accommodation plans for employees with disabilities. The process should include all elements under section 28 of the Regulation
 | * In consultation with Acclaim Disability Management Services members requiring accommodation shall have document plans developed, reviewed, acknowledged and agreed upon
 |
| 24 | Return to Work Process (s.29)January 1, 2014COMPLIANT | * Develop, document, and implement a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodations to return to work
* The return-to-work process should include all elements under section 29
 | * All Return-to-Work programs are developed through Human Resources and documented, reviewed, acknowledged, and signed off by members
 |
| 25 | Performance Management, Career Development and Advancement, and Redeployment (s.30-32)January 1, 2014IN PROGRESS priority for 2023 | * Take accessibility needs and individual accommodation plans into account during performance management, while providing career development and advancement and when redeploying employees with disabilities
 | * The performance management system is currently under review. During the review it will be considered how to best include section 30 in the system
* All positions are posted and filled through a job competition, which includes the provisions from item 18 and 19
 |

## Part 5: Transportation

The City of Greater Sudbury provides accessible transportation to the City of Greater Sudbury citizens; the Greater Sudbury Police Service does not offer services that are related to the transportation standards.

## Part 6: Built Environment

The Greater Sudbury Police Service strives to provide accessible built environments which meet the needs of persons with disabilities. All new construction that will take place on behalf of the Greater Sudbury Police Service will comply with the Built Environment Standards.

In 2020, a third administrative services division was re-located to an office building. All space was fully renovated in compliance with the Built Environmental Standards.

## Conclusion

Please let us know what you think about the Greater Sudbury Police Service’s “2014-2021 Multi-Year Accessibility Plan” or request a copy of the plan in an accessible format by contacting the Manager of Records and Customer Service at:

**Manager of Records and Customer Service**

Greater Sudbury Police Service

190 Brady Street

Sudbury ON, P3E 1C7

**Telephone:** 705-675-9171

**Electronic Mail:** gspsmail@gsps.ca

**To view this plan online visit:** [**http://www.gsps.ca**](http://www.gsps.ca)