

Accommodation Policy

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

1. Statement of Commitment:

LECA is committed to providing accommodation in accordance with the Accessibility for Ontarians with Disabilities Act (AODA) and Ontario Human Rights Code (Code) in relation to services and materials provided by LECA. Accommodation will be provided in accordance with the principles of dignity, inclusion, and with consideration to the needs of the individual. LECA will work cooperatively, and in a spirit of respect, with all partners in the accommodation process.

LECA is committed to treating all people in a way that allows them to maintain their dignity and independence. LECA believes in integration and equal opportunity and is 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 and providing accommodation in accordance with the Code.

2. Definitions:

Accommodation: Under section 2 of the Code, every person has a right to equal treatment with respect to the occupancy of accommodation, 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, disability or the receipt of public assistance.

Disability: Section 10 (1) of the Code¹ and 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. 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 LECA are accessible to all people, such that they can fully participate in the public complaints process.

4. Application:

This policy will apply to all services provided by LECA staff under the *Community Safety and Policing Act, 2019, S.O. 2019, c. 1, Sched. 1*(CSPA).

Any request for accommodation for accessing any services from the police services, including but not limited to, investigation, local response, informal resolution, or interviews, must be communicated to the police services directly and as soon as possible.

Any request for accommodation for participating at a hearing or adjudication under the CSPA must be brought to the tribunal or the hearing officer, as prescribed within their respective rules of procedures.

5. Requesting Accommodation:

Anyone who is seeking accommodation under the Code or the AODA should complete the accommodation request [form](#) and provide necessary information and details about the nature of the barrier that they are facing and the accommodation sought.

If an individual is unable to complete the form, they may contact LECA:

Phone:

Toll free: 1-877-411-4773

Local: 416-246-7071

TTY: 1-877-414-4773

Mail:

655 Bay Street, 10th Floor
Toronto, Ontario
M7A 2T4

Email:

leca.accommodation@ontario.ca

Fax:

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

Local fax: 416-327-8332

6. Accommodation Process:

Once the request for accommodation is received, and LECA has all the information it needs, LECA will review the request and determine the availability of the appropriate alternate arrangements. LECA may contact the requester if it needs more information. The accommodation process requires mutual cooperation. To that end, LECA will work and consult with the requester to put in place the accommodation that would meet the requester's need and remove the barrier in accessing the public complaints system.

Each case will be assessed based on its own merits, and while a specific timeline may not be provided, LECA will attempt to provide the requester with a response as expeditiously as possible.

In accordance with the AODA and the Code, LECA will take reasonable steps to provide accommodations to the point of undue hardship.

7. Privacy and Confidentiality:

The LECA acknowledges that requests for accommodation may require the disclosure of private, sensitive, and personal information. LECA 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.

LECA is subject to the *Freedom of Information and Protection of Privacy Act*, R.S.O.

1990, c. F.31(FIPPA) and must also comply with legal orders requiring the production of documents in certain circumstances.

8. Examples of Accommodation:

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

Wheelchair Accessibility: LECA ensures that its office is wheelchair accessible.

Service Animals: LECA welcomes service animals. When LECA staff cannot easily identify that an animal is a service animal, they 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 a person requires to bring a support person with them as an accommodation, they may do so by indicating “I need this person with me for support”.

Enclosed Spaces: If an individual has a disability that makes it very difficult to be in a closed room, they should provide specific information about their preferences. For example, “I would like to be in a larger room with the door open.”

Speech: If an individual has a disability that makes it difficult for you to understand speech, they may have the following options:

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

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

Organizational Difficulties: If organizational difficulties are part of an individual’s disability, they may ask for help putting their documents together in an order that would assist you.

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

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

9. Training:

LECA staff receives ongoing training regarding diversity, inclusion, and accessibility. This training includes information about accommodation, the importance of embracing diversity, as well as inclusive practices, to ensure staff understand requirements under the AODA and the Code.

10. 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.

11. Commitment to Anti-Ableism:

LECA 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.

LECA shall:

1. Maintain and enforce LECA's Accommodation Policy
2. Ensure that the Accommodation Policy and the Anti-Ableism Statement of Commitment are available to the public on LECA'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

12. Anti-Ableism Statement of Commitment

The purpose of this statement is to recognize LECA'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 LECA's Accommodation Policy and commits LECA 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, LECA recognizes that individuals with disabilities can offer the best information about their disability-related needs, if any.

13. Feedback process

LECA welcomes feedback on how it provides 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:

Phone:

Toll free: 1-877-411-4773

Local: 416-246-7071

TTY: 1-877-414-4773

Mail:

655 Bay Street, 10th Floor

Toronto, Ontario

M7A 2T4

Email:

leca.accommodation@ontario.ca

Fax:

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

Local fax: 416-327-8332

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