



Office of the  
Police Complaint Commissioner

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British Columbia, Canada

**ACCESSIBILITY PLAN**

**2024/25 to 2026/27**

## Territorial Acknowledgement

The Office of the Police Complaint Commissioner (OPCC) is located on the lands of the Ləkʷəŋən (Lekwungen) People and their ancestors, and our work extends across the homelands and territories of the First Nations within what we now call British Columbia. We honour the diverse territorial keepers of the lands, waters and sacred areas where we work. The OPCC recognizes the role of Indigenous Peoples as the original inhabitants and traditional stewards and caretakers of these lands and seeks to work with community members and leaders in an effort to advance reconciliation.

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## Message from the Police Complaint Commissioner

I am very honoured to be British Columbia’s Police Complaint Commissioner, a position I assumed on February 21, 2024. Ensuring the public has optimal accessibility to our services is a high priority for me. Before starting this position, my work in Ontario focused on ensuring respect for human rights, and fairness and transparency throughout the justice system. I understand the critical importance of effectively building responsive and inclusive practices into this province’s civilian municipal police oversight system and to appreciate and address systemic barriers in accessing the police complaint process.

Our Accessibility Framework begins with the foundational principle that disability rights are human rights, and people with disabilities are ensured full equality under the law, as outlined in the [Convention on the Rights of Persons with Disabilities](#).

The Office of the Police Complaint Commissioner (OPCC) was established in 1997 under the *Police Act* in recognition of a fundamental need for independent, civilian oversight of police in BC. This decision was also reinforced by tragic and unnecessary police-involved deaths of people with vulnerabilities related to medical conditions, language, cultural identity, experiences impacted by colonialism, and social dislocation.<sup>1</sup>

In a [2017 Statistics Canada survey](#), more than 926,000 British Columbians aged 15 and older – or roughly 25% of the population – identified as having at least one disability. These rates were highest among those with mental health or pain-related disabilities, along with the visually challenged. A [recent poll from the BC Human Rights Commission](#) found that one in four people with a disability experienced discrimination in the previous year. Given the unique and significant powers granted to police in the exercise of their duties, our office exists to ensure accountability and transparency when it comes to their use.

We have created this Accessibility Plan as part of our responsibilities under the Province’s recently introduced *Accessible British Columbia Act* (2021). This *Act* requires organizations to create a plan that will address systemic, physical, mental, virtual, and attitudinal barriers that people with disabilities can routinely face when accessing public services in BC. Creating an Accessibility Plan informed by community members with disabilities and the disability sector itself is a first for the OPCC, and our belief is, “[nothing about us without us](#)”.<sup>2</sup>

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<sup>1</sup> <https://opcc.bc.ca/resources/reports-of-interest/>

<sup>2</sup> This implies that accessibility rights should be created alongside the voices of those directly affected, and their representatives. The origins of the phrase pre-dates its adoption by the [International Disability Caucus](#), in the development of the United Nations “[Convention on the Rights of Persons with Disability](#).”

I am grateful to lead this blueprint for change, supported by our OPCC internal working group, the Independent Offices of the Legislative Assembly accessibility committee, and resources available through the [Accessibility Directorate, Ministry of Social Development and Poverty Reduction](#). Our plan going forward is intended to introduce programs, policies, human resource practices, collections of disability-related data, and investments in continual accessibility and inclusion training with specific relevance to our work in police oversight.

At this time, many people with disabilities are not aware of our office. I am dedicated to strengthening our outreach and engagement with disability organizations and understanding how people with disabilities access and navigate the municipal police complaint process.

It is my hope, through the development, implementation and evolution of our Accessibility Plan, that we can successfully identify and remove barriers to everyone engaging with the OPCC and the police complaint process.

## About the OPCC

The OPCC is a civilian, independent office of the Legislature established under the [Police Act](#). For complaints made against municipal police officers in BC, our office is the primary source of information and assistance. Our office oversees and monitors complaints and investigations and is responsible for the administration of discipline and proceedings under the *Police Act*. The Police Complaint Commissioner provides recommendations to police boards on matters of policies and procedures, and to the Ministry of Public Safety and Solicitor General (PSSG) to examine training and other programs to prevent recurrence of issues revealed by the complaint process.

Under the *Police Act*, the Commissioner has a responsibility to “inform, advise and assist” parties involved in the oversight of police and the police complaint process including persons who make complaints. Changes to the *Police Act* were implemented in 2024 to improve the complaint process. The changes address recommendations from the [2022 Special Committee on Reforming the Police Act](#) and from the [2019 Special Committee to Review the Police Complaint Process](#), as well as legislative changes requested by the OPCC. With these changes the Commissioner has the ability to self-initiate a systemic investigation and call a public hearing sooner in the complaint process. Amongst other amendments, the definition of misconduct was also expanded to include demeaning and discriminatory conduct, language, jokes or gestures, to align with the [BC Human Rights Code](#).

The OPCC has four overarching goals in fulfilling its mandate:

- To strengthen police accountability;
- To provide an accessible, effective and understandable police complaint process;
- To improve organizational performance; and,
- To promote people wellness and development.

## Accessibility Statement

To achieve our mandate of serving all members of the public who may be impacted by municipal police actions, we must ensure equitable access to the process which aims to make information, actions, and environments functional and meaningful to everyone. Accessibility refers to our physical space, website, reports and publications, and how we interact with members of the public. Access to the police complaint process requires removing any barriers for people exercising their right to complain about police conduct they have experienced or witnessed, as well as meeting our requirements under the [Accessible British Columbia Act](#).

### Legal Framework:

The *Act* focuses on achieving access for people with disabilities and aims to use concrete actions to ensure access to services and employment for people with disabilities.

The OPCC is listed as a “prescribed organization” under the *Act* as of September 2024. Creating an Accessibility Plan that is specific to our organization is key to fulfilling our obligations under the *Act*. The plan will evolve and improve based on continuous engagement with people with disabilities and diverse communities.

Organizations under the *Act* are required to establish a committee to assist in identifying, removing and preventing barriers to interacting with the office. The OPCC joined with other independent offices of the BC Legislature to create a joint Accessibility Committee. In order to meet obligations under the *Act*, the committee mutually developed terms of reference and a Memorandum of Understanding, signed in August 2023, which unites and coordinates the group in their effort to support each other in identifying, removing and preventing accessibility barriers to individuals and those interacting with the offices. The committee advises offices in their efforts to improve accessibility for those interacting with the offices. The composition of the committee is consistent to the extent possible with the requirements of the *Act* by including people with lived experience of disabilities, having Indigenous representation and by reflecting the diversity of the population of BC.

The OPCC is also required to provide a feedback mechanism to receive reports of accessibility barriers experienced by people within and interacting with the organization. This will be located on the new Accessibility page of the OPCC’s website by emailing [outreach@opcc.bc.ca](mailto:outreach@opcc.bc.ca).

Key definitions under the *Act*:

- **Disability:** The state of being unable to participate fully and equally in society due to the interaction between an impairment and a barrier.
- **Barrier:** Anything that hinders the full and equal participation in society of a person with an impairment. Barriers can be caused by environments, attitudes, practices, policies, information, communications, or technologies. Barriers can also be made worse by

intersecting forms of discrimination based on social categorizations such as class, race and gender.

- **Impairment:** A physical, sensory, mental, intellectual, or cognitive limitation, whether permanent, temporary, or episodic.

## Accessibility and the OPCC

The OPCC was established in 1996 in response to concerns related to systemic barriers in making a complaint about municipal police, identified by the Honourable Wally Oppal, K.C., in his [Closing the Gap Report](#).

Police complaints are investigated by police officers working in Professional Standards sections and overseen by the OPCC through each stage of an investigation or complaint resolution.

Past reviews including the [Davies Commission Inquiry into the death of Frank Paul \(2009\)](#), and the [Braidwood Commission on the death of Robert Dziekanski \(2010\)](#), shed light on the use of force, and the duty of care to those in police custody. These tragedies show that people with mental health conditions or incapacities face greater vulnerabilities in police interactions. The voice and protections of vulnerable and marginalized people expanded in 2010 with new provisions in the *Police Act*, making it possible for third parties to file a police complaint, creating a legal duty of officers to cooperate with an investigation, allowing the OPCC to oversee files in “real time” (not after a file was concluded), protection from retaliation for questioning or reporting police conduct or making a complaint, and allowing the Commissioner to appoint a representative should the Commissioner consider that the complainant is unable to assert their rights because of age or a mental or physical condition.

The [Special Committee to Review the Police Complaint Process \(2019\)](#) received submissions from organizations serving people with disabilities and identified a requirement to improve the efficiency, effectiveness and accessibility of the police complaint process. The [Special Committee on Reforming the Police Act \(2022\)](#) received submissions from disability advocates and organizations, which included recommendations to increase transparency and improve communications in the police complaint process.

## Guiding Framework

Having a disability can be defined two ways:

- **Social Model:** Identifies societal attitudes and conditions as the barriers.
- **Medical Model:** Focuses on an individual and the medical system.

As noted in the [WorkSafe BC Accessibility Plan](#), the *Act* has been developed through a [social model of understanding disability](#).

As an organization providing services to the public, the OPCC responds to the needs of individuals in the complaint process who are presenting the medical model of disability. As an employer, internally, we must also act on the duty to accommodate disabilities for individual employees. This plan focuses on the work that needs to occur addressing barriers on a societal level, both externally in service delivery and internally as employers, as mandated by the Act.

### Inclusion

There is significance in the principle of “nothing about us without us”, which was first introduced by communities of people with disabilities collectively calling for meaningful participation in decisions, policies and laws being created that affect people with disabilities. This is now reflected in the [UN Convention on the Rights of Persons with Disabilities](#).

In our context, this means that people with disabilities have voice and agency in order to fully participate in the police complaint process.

### Our Work to Date and Next Steps

The OPCC has reviewed past accessibility initiatives to build upon our earlier accomplishments and identify new areas that we have not yet addressed. As such, there are four areas of action identified as part of our accessibility plan:

- Communications Materials
- Services and Facilitating Access to Support
- Indigenous Accessibility
- OPCC Staff Learning and Organizational Development

The OPCC created an internal working group comprised of representatives from the Joint Independent Office of the Legislature Accessibility Committee, and interested staff with diverse backgrounds and abilities to help develop and guide the introduction of our Accessibility Plan. People with lived (and living) experience, demonstrated expertise, and commitment to accessibility for people with disabilities will have an opportunity to continue to join this working group.

#### 1. Communications Materials

##### **Actions Taken**

##### Community Feedback on Accessibility:

As a starting point, in 2021/ 2022 the OPCC surveyed and consulted with over 30 community service providing organizations for advice on revising our website and communication materials to make them more accessible. The OPCC also participates in

the Provincial Committee on Diversity and Policing (PCDP) and had an opportunity to engage in direct consultation with some PCDP community advisors to assist with updates to our communications materials.

Plain Language:

The police complaints process is complex, and it is important that our materials explain the process as clearly as possible. The OPCC worked with a plain language consultant to update the OPCC complaint form, website, and informational brochures, while also applying clear design principles.

Website:

In 2022, the [OPCC website](#) was reviewed for compliance with Web Content Accessibility Guidelines (WCAG 2.2) to make web content more accessible and inclusive for individuals with disabilities. Updates were made to the extent possible to meet web content accessibility guidelines such as providing alternative text for images, optimizing the site for use on mobile devices, and including sufficient size and contrast ratios between fonts and backgrounds.

Translation:

Ensuring that immigrants, refugees and others with newcomer backgrounds have access to our communications materials is a priority. We have translated the OPCC complaint form into 13 languages:

- French
- Punjabi
- Traditional Chinese
- Simplified Chinese
- Arabic
- Persian
- Vietnamese
- Korean
- Somali
- Hindi
- Spanish
- Urdu
- Filipino

Additionally, we have translated our General Information and Complaint Resolution brochures into these thirteen languages. These [translated materials](#) are available on our website and they have been distributed across municipal police departments and community-based agencies in [our jurisdictions](#).



### **Next Steps:**

- Build upon our outreach and engagement with organizations representing people with neurodiversity, brain injuries, and learning impairments to discuss how the OPCC can be more accessible and responsive.
- Continue to explore ways to make the OPCC website more accessible to people with disabilities, including a future scan for compliance with Web Content Accessibility Guidelines.
- Continue to review communications materials including letters, notices, decisions, and requests for plain language and accessible formats.

## **2. Services and Facilitating Access to Support**

### **Actions Taken**

#### Intake Services:

Our intake services at the OPCC are comprised of staff who have experience and dedication to serving diverse members of the community who need assistance with the police complaint process. OPPC complainants are provided with an option for direct assistance over the telephone to support people with diverse needs in their abilities to interact with the OPCC's complaint process.

#### "No Wrong Door":

Intake services also assist people who need to access alternate justice and government services through a "no wrong door" policy. This means that even when a complaint falls outside of our jurisdiction, the OPCC intake team helps complainants find the appropriate avenue for redress to prevent complainants from getting discouraged when submitting a complaint that requires additional administrative steps. As reflected in our [2023-2024 Annual Report](#), 286 enquiries were redirected by our front-line staff, of which 152 were related to the RCMP.

#### Support Agency Program:

The presence of a support person from an external community organization can increase a sense of safety, transparency, and participation in the complaint process for the diversity of the population the OPCC serves.

In response to the recommendations in the 2019 Special Committee Report, the OPCC hired a dedicated Outreach and Accessibility Coordinator position to expand our Support Agency Program and increase the number of agencies in our network to assist people with

equity barriers. Facilitating connections for those in the complaint process with community agencies has now been woven into our front-line positions across.

We have also expanded the number of agencies we collaborate with to include those assisting people representing broader categories of need across our jurisdictions. For more information, please see our full [Support Agency List](#).

A staff member or volunteer from a variety of community-based service providing organizations can assist with the following:

- Attending in-person or telephone meetings with specialized officers from the Professional Standards Section of a department. These officers investigate allegations of police misconduct and facilitate complaint resolution agreements.
- Providing disability expertise and/or specialized knowledge.
- Reviewing and assisting with complaint submissions.
- Complainant participation in proceedings.
- Interpretation or translation;
- Culturally relevant and trauma-informed support.

#### **Next Steps**

- Provide increased orientation on the municipal police complaint process to service providing agencies and associations to raise awareness of how staff and volunteers may support complainants in navigating the process.
- Regularly communicate with service providing agencies to ensure that they have proper information and materials on the police complaint process that can be shared with clients.
- Create a “complainant’s check list” to simplify and make it more accessible for people submitting police complaints.

### **3. Indigenous Accessibility**

#### **Actions Taken:**

##### Indigenous Accessibility Strategy:

In keeping with recommendations that were made by the National Inquiry into Missing and Murdered Indigenous Women and Girls, in the [Truth and Reconciliation Commission’s Final Report](#), and the Province’s [Declaration on the Rights of Indigenous Peoples Act](#), we initiated a multi-year Indigenous Accessibility Strategy to improve the OPCC’s responsiveness to the needs of Indigenous peoples and build meaningful relationships.

### Cultural Safety Training:

OPCC staff receive training in areas of Indigenous cultural competency and awareness as part of our efforts to respond to actions outlined in the Truth and Reconciliation Commission Final Report, and [Calls For Justice](#) issued from the National Inquiry into Missing and Murdered Indigenous Women and Girls.

### Outreach and Engagement:

We have worked to broaden our network of Indigenous organizations providing culturally relevant, legal, and social support services to community members involved in the police complaint process.

### **Next Steps:**

- We will continue to prioritize our multi-year Indigenous Accessibility Strategy. This past year we received findings from an external consultant supporting the initiation of our strategy, which identified key learnings from participants in an engagement process. These included opportunities to build better, trusting relationships, such as:
  - Collaborating with Indigenous communities at a formal level (e.g. advisory groups);
  - Investing in relationship-building exercises with Indigenous communities, organizations and staff;
  - Substantively increasing outreach in Indigenous communities to promote services and accessibility;
  - Articulating the values of compassion and care to all complainants in the process; and,
  - Addressing the over-reliance on mandated forms.
  
- We will also continue our outreach and engagement with a focus on relationship building with Indigenous leadership groups and support agencies to benefit from their knowledge, expertise, and insight. We are committed to building meaningful relationships and hearing the voices of those affected by potential policing misconduct and the unique issues faced by Indigenous community members.

#### 4. OPCC Staff Learning and Organizational Development

##### **Actions Taken**

###### Professional Development Days:

OPCC staff have benefitted from in-person professional development training in the last three years from organizations with specialized knowledge and commitment to diverse communities of people with disabilities, including:

- [Autism BC](#)
- [BC Aboriginal Network on Disability Society \(BCANDS\)](#)
- [Canadian Mental Health Association BC](#)
- [Car 87 –Mental Health Crisis](#)
- [Native Courtworker and Counselling Association of British Columbia](#)
- [Our Place Society](#)
- [Victoria Cool Aid Community Health Centre](#)

###### Indigenous Cultural Safety Workshops:

The OPCC's Indigenous Cultural Safety Advisor has led three workshops in the last three years with staff at all levels to ensure we fulfill our mandate with cultural awareness, sensitivity and agility, and to strengthen an accessible and culturally safe police complaint process for diverse Indigenous community members.

###### Accessibility BC Act Workshop:

In July 2024, the OPCC held a workshop with guest speakers from Untapped Accessibility and the Victoria Disability Resource Centre to raise awareness of our requirements under the *Act*. This included discussing key principles of accessibility, planning how to incorporate and apply these principles in our day-to-day work, and assisting OPCC staff in responding to the needs of people with disabilities accessing the police complaint process and support internal needs.

### Next Steps

- Arrange a dedicated session with the Victoria Disability Resource Centre for OPCC Intake, Admissibility Analysts and Outreach staff.
- Review existing policies and practices to promote accessibility and research accessibility policies in other relevant workplaces across jurisdictions.
- Review human resource practices, including accessible job board options for recruitment and retention to support a diverse workforce.

### How to Provide Feedback

While this is a starting point for the OPCC’s Accessibility Plan we look forward to receiving ongoing feedback and continuously learning in these areas as our plan evolves over the next three years:

Date	Activity
September 2024 to August 2026	<ul style="list-style-type: none"><li>• Continue ACTION/NEXT STEPS items outlined in plan above.</li></ul>
September 2025 to August 2026	<ul style="list-style-type: none"><li>• Review feedback received from public, community agencies and our Accessibility Committee.</li></ul>
September 2026 to August 2027	<ul style="list-style-type: none"><li>• Update our three-year plan; identify progress on commitments, future needs and plans to accomplish priority areas.</li></ul>

The Act requires that we seek feedback on our Accessibility Plan from both the Joint Accessibility Committee, made up of all the Independent Offices of the Legislature, and from the public. Anyone wishing to provide feedback on our Accessibility Plan, accessibility of services, digital information, or written materials can contact the OPCC by:

- Email at [info@opcc.ca](mailto:info@opcc.ca) or
- Telephone at 1-877-999-8707 or 250-356-7458  
Office hours are 8:30 a.m. to 4:30 p.m. Monday to Friday, excluding statutory holidays

We also plan to gather feedback from our staff, our internal working group, and external community agencies on our Support Agency List and in our network.

General information about the OPCC and the police complaint process can be found on the [OPCC website](#).