



**Canadian Mental  
Health Association**  
Ontario  
*Mental health for all*

**Association canadienne  
pour la santé mentale**  
Ontario  
*La santé mentale pour tous*

Peter Tabuns, MPP (Toronto-Danforth)  
Chair, Standing Committee on Social Policy  
Room 1405, Whitney Block  
99 Wellesley Street West  
Toronto, Ontario M7A 1A2

March 7, 2016

Dear Mr. Tabuns:

**Re: *Bill 163 – Supporting Ontario’s First Responders Act (Post-traumatic Stress Disorder), 2016***

Canadian Mental Health Association (CMHA) Ontario would like to thank the Legislative Assembly of Ontario's Standing Committee on Social Policy for this opportunity to provide our perspective on *Bill 163 – Supporting Ontario’s First Responders Act*.

We commend the Minister of Labour, the Hon. Kevin Flynn, and the Minister of Community Safety and Correctional Services, the Hon. Yasir Naqvi for proposing this legislation to amend the *Workplace Safety and Insurance Act* and the *Ministry of Labour Act* with respect to post-traumatic stress disorder (PTSD). CMHA Ontario also commends all parties in the legislature for unanimous support of the bill during second reading, and especially MPP Cheri DiNovo for her efforts on this issue. We understand that the intent of this legislation is to prevent and mitigate the risk of PTSD among Ontario’s first responders.

First responders face a number of unique stressors in their workplaces that make it that much more important to prioritize mental health and well-being. While any negative or unpleasant event can be stressful, exposure to crime, violence and other dangerous situations common in this field can be particularly stressful and seriously impact one’s mental health. Exposure to these situations can be traumatic. They can be frightening, overwhelming or cause a significant amount of distress. Everyone can experience these types of situations and people can react differently to them: they might feel nervous, have trouble sleeping or revisit them in their mind. Such reactions are normal and tend to decrease over time, allowing people to get back to their daily lives. When these reactions are more intense, last for an extended period of time and severely disrupt one’s life and mental health, then PTSD may be present. When these reactions are a result of experiences in the workplace, PTSD can be classified as a type of Operational Stress Injury or OSI. An OSI is any persistent psychological difficulty that results from operational duties such as law enforcement, combat or any other service-related duties.

We are pleased that this proposed legislation would establish a presumption that PTSD diagnosed in first responders is related to their work, easing their access to Workplace Safety and Insurance Board benefits and better supporting their recovery. This important legislation marks a positive step towards ensuring that the mental health needs of first responders are adequately met in a timely manner.

CMHA Ontario understands the unique operational stressors first responders face daily in carrying out their professional duties. Numerous studies have shown that these stressful situations can increase the risk of PTSD in first responders. The stigma that exists around the reporting of PTSD, paired with inadequate support can have tragic consequences. By acknowledging the stress and trauma that first responders experience on a routine basis and providing them with accompanying support, we better promote and value their health as they provide Ontarians with their vital services every day.

While CMHA Ontario supports Bill 163, we believe that the list of identified workers it will apply to [in "Application" section (2), pg.4] is too narrow and should be expanded to include additional groups. Some workers not identified in the legislation may face similar operational stress injuries as first responders and are prone to similarly elevated risks of developing PTSD. Probation and parole officers are routinely exposed to stressful situations and traumatic incidents as a result of their daily work and should be afforded the same supports through Bill 163. Privately contracted security professionals, especially those who are contracted to work in correctional facilities or detention centres, should be included in Bill 163. Further, individuals who provide security services outside of correctional institutions – in hospitals for example – regularly provide close assistance to first responders or perform similar duties in their stead in stressful and traumatic situations. Security professionals face the same heightened risk for developing PTSD and also merit the supports offered in Bill 163.

CMHA Ontario is also concerned about the proposed criteria that would entitle identified workers to receive PTSD-related workplace insurance benefits [in "Entitlements to benefits" section (3) (c) (ii), pg.5]. Bill 163 would entitle an eligible worker to PTSD-related benefits provided they have been diagnosed no later than 24 months after their last day as an applicable worker. This timespan deserves further consideration. A worker may begin to experience negative effects resulting from on the job exposure to stressful situations or traumatic incidents long after the traumatic events take place. The resulting symptoms of PTSD can thus begin to take place much later than 24 months and may take even longer to be noticed and diagnosed properly. The stigma surrounding the reporting of PTSD may additionally delay workers in seeking out a diagnosis after the initial experience of related symptoms. CMHA Ontario recommends that the Standing Committee on Social Policy further examine the time period when benefits provided by Bill 163 will be made available to workers following a diagnosis of PTSD.

CMHA Ontario would like to partner with the Government of Ontario in the implementation of Bill 163. We have a long history of providing support to employers and employees in addressing mental health in the workplace. Our Mental Health Works program, which is a social enterprise of CMHA Ontario, has for the past 20 years successfully helped workers deal with operational stress and reduced the stigma associated with seeking help. In line with the intentions of Bill 163, Mental Health Works has a new adaptation specifically designed for supporting professionals in the justice sector, including police officers, legal professionals, correctional employees and security professionals. The Mental Health Works program is tailored to meet the needs of each audience and provides practical strategies for addressing operational stress and promoting mental health in the workplace.

Thank you for the opportunity to provide our feedback on Bill 163. CMHA Ontario is pleased to provide further support to the government and the Standing Committee on Social Policy during the ongoing development of this legislation.

If you have any further questions, please feel free to contact me directly at [cquenneville@ontario.cmha.ca](mailto:cquenneville@ontario.cmha.ca) or by phone at 416-977-5580 x 4126.

Sincerely,



Camille Quenneville  
CEO  
Canadian Mental Health Association, Ontario

cc Hon. Minister Kevin Flynn, Minister of Labour  
Hon. Minister Yasir Naqvi, Minister of Community Safety and Correctional Services

Ted Arnott, PC Critic, Labour

Rick Nicholls, PC Critic, Community Safety and Correctional Services

Cindy Forster, NDP Critic, Labour

Jennifer K. French, NDP Critic, Community Safety and Correctional Services

### **About the Canadian Mental Health Association**

The Canadian Mental Health Association (CMHA), which operates at the local, provincial and national levels across Canada, works toward a single mission: to make mental health possible for all. The vision of CMHA Ontario is a society that believes mental health is the key to well-being. We are a not-for-profit, charitable organization which is funded by the Ontario Ministry of Health and Long-Term Care. Through policy analysis and implementation, agenda setting, research, evaluation and knowledge exchange, we work to improve the lives of people with mental health and addictions conditions and their families. As a leader in community mental health and a trusted advisor to government, we actively contribute to health systems development through policy formulation and by recommending policy options that promote mental health for all Ontarians. CMHA Ontario works closely with 31 local branches in communities across the province to ensure the quality delivery of services in the areas of mental health, addictions, dual diagnosis and concurrent disorders which occur across the lifespan.