

## ACCESSIBILITY POLICY (ONTARIO)

### **Purpose:**

The Accessibility for Ontarians with Disabilities Act, 2005 (“the Act”) a law of the Province of Ontario, that, together with the Integrated Accessibility Standards Regulation (the “Regulation”), has the purpose of developing, implementing and mandating accessibility standards in order to achieve accessibility for persons with disabilities, with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises, and providing for the involvement of persons with disabilities, the Government of Ontario and others in the development of accessibility standards.

The purpose of this policy is to set out the objectives of Wawanesa in order to achieve compliance with the Act and Regulation, which work in conjunction with the Ontario Human Rights Code, in order to help identify and remove barriers for people with disabilities in the following areas:

- The Provision of Goods and Services to Persons with Disabilities;
- The Use of Assistive Devices;
- The Use of Guide Dogs and other Service Animals;
- The Use of Support Persons;
- Notice of Service Disruptions;
- Customer Feedback;
- Training;
- Notice of Availability and Format of Required Documents;
- Accessible Information and Communication, including website and design;
- Accessible and Equal Employment Opportunities; and
- Accessible Design of Public Spaces.

### **Statement of Organizational Commitment:**

Wawanesa is committed to ensuring equal access for people with disabilities and treating people with disabilities in a way that allows them to maintain their dignity and independence and is consistent with the principles of integration and equal opportunity.

Wawanesa is committed to operating a barrier-free environment for persons with disabilities in employment, in its communications and information, in the delivery of goods and services and in its built environment. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Act and associated regulations.

Wawanesa is committed to ensuring that all its employees are aware of their responsibilities to foster an accessible and inclusive environment with and for persons with disabilities.

### **Scope:**

This policy applies to all are employees, volunteers, agents, contractors, and third parties who deal with the public and who work under the direction of Wawanesa in Ontario. This policy applies in Ontario to the provision of products and services at premises owned or operated by Wawanesa as well as any interactions with employees and customers via telephone, email or written mail.

### **Policy:**

## **1. The Provision of Goods and Services to Persons with Disabilities**

Wawanesa will make all reasonable efforts to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers receive the same value and quality of service;
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing products and services; and
- communicating in a manner that takes into account the customer's disability.

## **2. Assistive Devices**

Persons with disabilities may use their own assistive devices as required when accessing products or services provided by Wawanesa.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure access to products and services. For example, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, products and service will be provided in a location that meets the needs of the customer.

## **3. Guide Dogs and other Service Animals**

A customer with a disability that is accompanied by a guide dog or other service animal will be allowed access to premises that are open to the public, unless otherwise excluded by law.

If a guide dog or other service animal is excluded by law, such as a municipal by-law or regulation, Wawanesa will try to offer alternative methods to enable the person with a disability to access products and services, when possible.

### Care and Control of the Guide Dog or other Service Animal

The customer that is accompanied by a service animal or guide dog is responsible for maintaining care and control of the animal at all times.

### Allergies

If a health and safety concern presents itself to a third-party as a result of the use of a guide dog or other service animal (for example in the form of a severe allergy), Wawanesa will make reasonable efforts to meet the needs of all individuals.

## **4. Support Persons**

If a customer with a disability is accompanied by a support person, Wawanesa will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

With the consent of the customer, customer information may be shared with the support person in the course of providing services to the customer.

## **5. Training**

Training will be provided to all employees who deal with the public or other third parties that act on behalf of Wawanesa while on Wawanesa's premises. Revised training will be provided in the event of changes to the Act or Regulations, or Wawanesa's policy, practices and procedures. Wawanesa will keep a record of training that includes the dates training was provided, the number of employees and names of employees trained.

The training will include information on the purposes of the Act and Regulations, and:

- the purposes of the Act;
- requirements of the Act and Regulations;
- how to communicate and interact with people with disabilities;
- how to interact with service animal or support person;
- how to utilize assisted devices that are available at our premises, what to do if a person has difficulty accessing Wawanesa's services or facilities;
- The components of Information and Communication, including:
  - Accessibility Plan
  - Annual Reports
  - Emergency procedures, plans or public safety information
  - Accessible web information and content
- The components of employment including:
  - Notice to Successful applicants
  - Informing employees of support
  - Workplace emergency response information
  - Accommodation plans
  - Return to work
  - Performance Management, Career Development and Advancement, and Redeployment
- Transportation;
- Design of Public Spaces
- Wawanesa's policies and procedures as they relate to the Act and Regulations; and
- The Ontario Human Rights Code as it pertains to persons with disabilities.

## **6. Notice of Disruptions in Service**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Wawanesa. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

## **7. Feedback Process**

Wawanesa will provide customers/clients with the opportunity to provide feedback on the service provided to persons with disabilities. Information about the feedback process will be readily available to all customers/clients and notice of the process will be made available at location reception. Feedback

forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (handwritten or email) will be available upon request.

Wawanesa is committed to meeting accessibility requirements and continuously taking steps to improve its services and website to comply with the Act and its regulations. Wawanesa will work to identify and correct barriers which prevent access to our goods, services, websites and content. The Manager, Accessibility and Workplace Safety will receive feedback and triage it to the appropriate department for correction and improvement. The Manager, Accessibility and Workplace Safety will work with the feedback provider to ensure the proposed steps to be taken will effectively remove the barriers identified and alleviate their concerns.

To help us do this, we welcome your comments and suggestions. You can provide feedback by contacting us:

- by telephone at 1-204-946-2477
- in writing to:
  - Manager, Accessibility & Workplace Safety
  - The Wawanesa Mutual Insurance Company
  - 191 Broadway, Winnipeg, Manitoba R3C 3P1

or

- by email to [accessibility@wawanesa.com](mailto:accessibility@wawanesa.com).

If the Manager, Accessibility & Workplace Safety is unable to resolve the feedback in a manner to your satisfaction, you may escalate your feedback to the Office of the Ombudsman by:

Mail:

- by telephone at 1-844-241-0229
  - in writing to:
    - Office of the Ombudsman
    - 4110 Yonge Street, Suite 100
    - Toronto, Ontario M2P 2B7
- or
- by email to [ombudsman@wawanesa.com](mailto:ombudsman@wawanesa.com).

## **8. Availability and Format of Documents (Alternative Formats)**

All documents required by the Regulation, including this Policy, notices of temporary disruptions, training records, and written feedback process are available upon request. When providing these documents to a person with a disability, Wawanesa will endeavour to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

Notice of the availability of documents required by the Regulation will be posted on Wawanesa's website at: [www.wawanesa.com](http://www.wawanesa.com).

Wawanesa will notify customers that the documents related to the Regulation are available upon request and in a format that takes into account the customer's disability. Notification of disruption will be given by posting the information in a conspicuous place owned and operated by Wawanesa, the

website and/or any other reasonable method. In the event that a notification needs to be posted, the following information will be included unless it is not readily available or known:

- the products or services that are disrupted or unavailable;
- the reason for the disruption;
- the anticipated duration; and
- a description of alternative services or options

## **9. Exceptions**

The Integrated Accessibility Standards Regulation of the Act (the “IASR”) does not apply to product and product labels, unconvertible information or communication or information that Wawanesa does not control directly or indirectly through a contractual relationship.

If Wawanesa determines that information or communications are unconvertible, we will provide the person requesting the information or communication with an explanation as to why it is unconvertible.

## **10. Accessibility Plan**

Wawanesa will establish, implement, maintain and document a Multi-Year Accessibility Plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. The Multi-Year Accessibility Plan will outline strategies and timeframes which Wawanesa will implement to remove barriers (physical, attitudinal, architectural and technological) and ensure a safe environment for both customers and employees.

The Multi-Year Accessibility Plan will be:

- Posted on Wawanesa’s website and be provided in an accessible format, upon request, as soon as is practicable; and
- Reviewed and updated at least once every five years

## **11. Accessible Information and Communications**

### Emergency Procedures, Plans or Public Safety Information

Emergency procedures, plans or public safety information, that are publicly available, will be provided in an accessible format or with appropriate communication supports, upon request, as soon as practicable.

### Accessible Websites and Web Content

Wawanesa will work toward making its website and web content conform to the Worldwide Web Consortium’s Web Content Accessibility Guidelines (WCAG) 2.0, initially at level A and increasing to level AA in accordance with the timeframes set out in section 14 (4) of the IASR.

### Accessible Employment

The requirements set out in the Accessible Employment Standards section of Wawanesa’s Accessibility Policy apply only to employees of Wawanesa. They do not apply to volunteers or other non-paid individuals.

### Notice to Successful Applicants

When making offers of employment, Wawanesa will notify the successful applicant of their policies for accommodating employees with disabilities.

### Informing Employees of Support

Wawanesa will inform employees of their policies used to support its employees with disabilities including those on the provision of job accommodation that take into account an employee's accessibility needs.

This information will be provided to new employees as soon as practicable after they begin their employment with Wawanesa.

Updated information will be provided to employees whenever there is a change to existing policies on the provision of job accommodations.

### Accessible Formats and Communication Supports for Employees

When requested by an employee, Wawanesa will consult with the employee to provide or arrange for the provision of accessible formats and communication supports needed to perform the employee's job as well as information generally available to employees in the workplace.

## **12. Workplace Emergency Response Information**

Wawanesa will provide individualized workplace emergency response information to employees who have a disability, if their disability is such that the individualized information is necessary and that Wawanesa has been made aware of the need for accommodation.

### Individualized workplace emergency response information will be reviewed

Individualized workplace emergency response information will be reviewed when an employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when Wawanesa reviews its general emergency response policies.

### Documented Individual Accommodation Plans

Wawanesa will develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process will include the elements identified in section 28 (2) of the IASR.

### Return to Work

Wawanesa will develop, document and have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation to return to work.

### Performance Management, Career Development and Advancement, and Redeployment

Wawanesa will take into account the accessibility needs of employees with disabilities and individual accommodation plans in performance management processes, when providing career development and advancement opportunities and when considering redeployment of employees with disabilities.

### Performance Measurement

The Accessibility Policy will be reviewed and amended when additional accessibility regulations are enacted by the Government of Ontario or as required.

### **13. Accountabilities and Responsibilities**

If you have any questions or concerns about this policy or its related procedures please contact the Manager, Accessibility & Workplace Safety at [accessibility@wawanesa.com](mailto:accessibility@wawanesa.com).

The Wawanesa Ontario Management Team is accountable to and responsible for:

- Fostering open and constructive communication;
- Demonstrating sensitivity to and respect confidentiality of information;
- Raising awareness to facilitate understanding of the policy;
- Participating and co-operating to facilitate workplace accommodation.

Wawanesa Employees are accountable to and responsible for:

- Participating and cooperating with all parties to facilitate workplace accommodation.

Wawanesa Human Resources is accountable to and responsible for:

- Participating and cooperating with all parties;
- Acting as a resource for all parties and participants; and
- Supporting and educating managers and employees in their obligations under the policy.

### **Definitions**

**Accessible Formats** may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

**Assistive Device** means a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that members and guests bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

**Barrier** as defined by the Ontarians with Disabilities Act, 2001, means anything that prevents a person with a disability from fully participating in all aspects of society because of his/her disability. This includes:

- a physical barrier;
- an architectural barrier;
- an informational or communications barrier;
- an attitudinal barrier;
- a policy, practice and procedure barrier.

**Career Development and Advancement** includes providing additional responsibilities within and employee's current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the

organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of both.

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

**Communication Support** may include, but is not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

**Disability** - a key feature of the Act is its definition of “disability”. Under the Act, the definition of “disability” is the same as the definition in the Ontario Human Rights Code:

Any degree of physical disability, infirmity, malformation or disfigurement including, but not limited to:

- 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;
- Physical reliance of a guide dog or other animal, or on a wheelchair or other remedial appliance or device;
- A condition of mental impairment or a developmental disability;
- A learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety & Insurance Act, 1997.

The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

This is a broad definition, and one that must be considered closely when educating our employees in the appropriate response to our customers.

**Guide Dog** means a highly-trained working dog that has been trained at one of the special facilities to provide mobility, safety and increased independence for people who are blind.

**Information** includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

**Performance Management** means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

**Recruitment** means the activities related to the making of an offer of employment.

Redeployment means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

**Service Animal** - the Regulation (Ontario Regulation 429/07, Section 4(9)(a-b)) defines a “service animal” as “an animal for a person with disability”. In this policy, a service animal is:

- any animal used by a person with a disability for reasons relating to the disability; or
- where the person provides a letter from a physician confirming that they require the animal for reasons relating to their disability; or
- where the person provides a valid identification card signed by the Attorney General of Canada or a certificate of training from a recognized guide dog or service animal training school.

**Support Person** means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

**Web Content Accessibility Guidelines** means the World Wide Web Consortium Recommendations, dated December 2008, entitles “Web Content Accessibility Guidelines (WCAG) 2.0”.