

Ontario Accessibility Policy

AODA - Policy, Practice and Procedures

Purpose and Background

The Accessibility for Ontarians with Disabilities Act, 2005 (“the AODA”) is a Provincial Act with 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. Under the AODA, Ontario Regulation 429/07, entitled “Accessibility Standards for Customer Service” (“the Regulation”), came into effect on January 1, 2008. The Integrated Standards Regulation came into effect on January 1, 2014. The Regulation establishes accessibility standards specific to customer service, information and communication, employment, design of public spaces and transportation for private sector organizations that provide goods and services to members of the public or other third parties.

The objective of this policy is to identify what the equal treatment provisions of the Ontario Human Rights Code, through the AODA and the Regulation, require with respect to service delivery to persons with disabilities and addresses the following:

- The Provision of Goods and Services to Persons with Disabilities;
- The Use of Assistive Devices;
- The Use of Guide Dogs and 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 Commitment and Accountabilities

COMMITMENT

The Wawanesa Mutual Insurance Company (referred to as “Wawanesa”) is committed to providing a respectful, welcoming, accessible, and inclusive environment in the provision of goods and services for both customers/clients and employees alike. Wawanesa is committed to, and strives to ensure that, the Accessibility for Ontarians with Disabilities Act (AODA), 2005, the standards and all other relevant legislation concerning accessibility, are rigorously observed. Wawanesa ensures that all persons within its community are aware of their rights and responsibilities to foster an accessible and inclusive environment with and for persons with disabilities.

People with disabilities will be given an equal opportunity to obtain, use and benefit from Wawanesa’s products and services, and employment opportunities, in a way that is respectful of their dignity and independence.

Wawanesa will take into account the person's disability in all interactions verbally, written or otherwise, always providing equal opportunity.

Wawanesa is committed to becoming a barrier free environment and meeting the requirements of all existing legislation and its own policies and goals related to identifying, removing and preventing barriers to people with disabilities that might interfere with their ability to make full use of the services provided by Wawanesa.

ACCOUNTABILITIES

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.
- Supporting and educating managers and employees in their obligations under the policy.

Scope

Covered under this policy are employees, volunteers, agents and/or contractors who deal with the public or other third parties that work directly for Wawanesa in Ontario. This policy applies in Ontario to the provision of goods and services at premises owned and/or operated by Wawanesa as well as any interactions with employees and customer/clients via telephone, email or written mail.

Note: Excluded from this policy are any independent brokers, agents or contractors working outside of the Wawanesa premises.

DEFINITIONS

Assistive Device

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.

Disability

A key feature of the AODA is its definition of "disability".

Under the AODA, 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; or
- 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.
- 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.

Barrier

As defined by the Ontarians with Disabilities Act, 2001, 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.

Guide Dog

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.

Service Animal

The Regulation 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

A 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.

Accessible Format

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.

Kiosk

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.

Communications

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.

Information

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

Web Content Accessibility Guidelines

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

Performance Management

Activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

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.

Redeployment

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.

Recruitment

Wawanesa will notify internal and external job applicants that, where/when needed, accommodations for disabilities will be provided, on request, to support their participation in all aspects of the recruitment process.

AODA Policy, Practice and Procedure

THE PROVISION OF GOODS AND SERVICES TO PERSONS WITH DISABILITIES

Wawanesa will make every reasonable effort 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;

- 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 goods and services; and
- communicating in a manner that takes into account the customer's disability.

ASSISTIVE DEVICES

Persons with disabilities may use their own assistive devices as required when accessing goods 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 the access of goods and services.

For example, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

GUIDE DOGS AND SERVICE ANIMALS

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

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

If a guide dog or service animal is excluded by law, Wawanesa will try to offer alternative methods to enable the person with a disability to access goods and services, when possible.

Recognizing a Guide Dog and/or Service Animal

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Wawanesa may request verification from the customer. Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- 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.

Care and Control of the Animal

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

Allergies

If a health and safety concern presents itself, for example in the form of a severe allergy to the animal, Wawanesa will make all reasonable efforts to meet the needs of all individuals.

SUPPORT PERSONS

If a customer/client 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/client is not prevented from having access to the support person.

All customer/client confidentiality requirements and practices will also apply to support persons.

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 legislation or Wawanesa's policy, practice and procedure. 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 AODA and the requirements of the Regulations (Customer Service and Integrated Standard).

Training will include information on:

- the purposes of the AODA,
- requirements of the Regulation,
- 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
- Company policies, procedures and practices pertaining to AODA
- The Ontario Human Rights Code as it pertains to Persons with Disabilities

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 .

FEEDBACK PROCESS

Wawanesa shall 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 (hand written or email) will be available upon request.

Customers can submit feedback to ombud-ontario@wawanesa.com

AVAILABILITY AND FORMAT OF DOCUMENTS (ALTERNATIVE FORMATS)

All documents required by the Accessibility Standards for Customer Service, including Wawanesa's Accessibility Policy, notices of temporary disruptions, training records, and written feedback process are available upon request, subject to the Freedom of Information and Protection of Privacy Act ("FIPPA"). 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 Accessibility Standards for Customer Service will be posted on Wawanesa website at www.wawanesa.com

Wawanesa shall notify customers and employees that the documents related to the Regulations are available upon request and in a format that takes into account the person's disability. Notification 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:

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

EXCEPTIONS

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 shall provide the person requesting the information or communication with an explanation as to why it is unconvertible.

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.

ACCESSIBLE INFORMATION AND COMMUNICATIONS

Emergency Procedures, Plans or Public Safety Information

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

Accessible Websites and Web Content

Wawanesa shall 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 shall 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.

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

Return to Work

Wawanesa shall 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 shall 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/or amended when additional accessibility regulations are enacted by the Government of Ontario or as required.

Related Documents:

- Ontarians with Disabilities Act, 2001
- Accessibility for Ontarians with Disabilities Act, 2005
- Ontario Regulation 191/11 – Integrated Accessibility Standards Regulation
- Ontario Regulation 429-07 – Accessibility Standards for Customer Service
- Ontario Human Rights Code

ADMINISTRATION

If you have any questions or concerns about this policy or its related procedures please contact **ombud-ontario@wawanesa.com**

Wawanesa Accessible Customer Service Principles

DIGNITY

The principle of respecting the dignity of a person with a disability means treating them as customers and clients who are as valued and as deserving of high quality and timely service as any other customer. Persons with disabilities are not treated as an afterthought or forced to accept lesser service, quality or convenience. The delivery of goods and services must take into account how persons with disabilities can effectively access and use them.

INDEPENDENCE

In some instances, independence means freedom from control or influence of others – freedom to make one’s own choices. In other situations, it may mean the freedom to do things in one’s own way. People who may move or speak more slowly or differently must not be denied an opportunity to participate in a program or service because of this. Staff must allow persons with disabilities to take the time they need, without rushing them or taking over a task for them if someone prefers to do it themselves in their own way.

INTEGRATION

The provision of goods or services to persons with disabilities and others must be integrated to allow persons with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. Integration means that policies, programs and services including practices and procedures are designed to be accessible to everyone, including persons with disabilities.

EQUAL OPPORTUNITY

Equal opportunity means having the same chances, options, benefits and results as others. In the case of services it means that persons with disabilities have the same opportunity as others to obtain, use and benefit from the way goods or services are provided. They should not have to make significantly more effort to access or obtain services. They should also not have to accept lesser quality or more inconvenience.