



Accessibility Policies

Accessibility Policy Statement

Gillons Insurance Brokers Ltd. ("Gillons") is committed to providing equal treatment and opportunity to people with disabilities with respect to accessing services, accommodation and employment in a way that respects their dignity and independence. Gillons 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 *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA").

Intent

The *Integrated Accessibility Standards, Regulation 191/11* ("IASR") under the AODA establishes standards to address barriers that persons with disabilities face in the areas of information and communications, employment and the design of public spaces. The *Accessibility Standards for Customer Service, Regulation 429/07* under the AODA establishes accessibility standards for providing services to persons with disabilities. The requirements under these standards are not a replacement or substitution for the requirements of the Ontario *Human Rights Code*.

The purpose of these policies is to put in practice our responsibilities under the AODA and to ensure that Gillons complies with the Government of Ontario's accessibility standards.

Scope

- a) This policy applies to the provision of goods and services at premises owned and operated by Gillons.
- b) This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Gillons, including when the provision of goods and services occurs off the premises of Gillons.
- c) The section of this policy that addresses the use of service animals only applies to the provision of goods and services that take place at premises owned and operated by Gillons.
- d) This policy shall also apply to all persons who participate in the development of Gillons' policies, practices and procedures governing the provision of goods and services to members of the public or third parties.

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 customers 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.

Communication Supports – Supports facilitating effective communications, including, captioning, alternative and augmentative communication supports, plain language and sign language.

Disability – the term disability as defined by the Ontario *Human Rights Code*, refers to:

- 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;
- A condition of mental impairment or a developmental disability;
- A learning disability, or 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 Brokers plan established under the *Workplace Safety and Insurance Brokers Act*.

Service Animals – Animals individually trained to do work or perform tasks for the benefit of a person with a disability.

Employees – Every person who deals with members of the public or other third parties on behalf of Gillons, whether the person does so as an employee, agent, volunteer or otherwise.

Persons with Disabilities – Individuals who have a disability as defined under the Ontario *Human Rights Code* (and above).

Support Person – as reflected in Ontario Regulation 429/07, 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.

MULTI-YEAR ACCESSIBILITY PLAN

Gillons will prepare and maintain a Multi-Year Accessibility Plan, which outlines the phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the AODA. It will report annually on the progress and implementation of the Multi-Year Accessibility Plan, post the information on its website and provide the information in an accessible format upon request.

The Multi-Year Accessibility Plan will be reviewed and updated at least once every five (5) years.

CUSTOMER SERVICE STANDARDS

Reasonable efforts will be made by Gillons, including its employees, volunteers and individuals providing services on their behalf, to ensure that:

- Persons with disabilities are provided equal opportunity to obtain, use and benefit from Gillons' services;
- Gillons' services are provided in a manner that respects the dignity and independence of persons with disabilities;
- Services provided to persons with disabilities are integrated with the provision of services to others unless an alternative measure is necessary to allow a person with a disability to benefit; the alternative measure may be temporary or permanent;
- Communications with a person with a disability are conducted in a respectful manner that take the person's disability into account;
- Persons with disabilities may use assistive devices, service animals and support persons as is necessary to access Gillons offices and services, unless superseded by other legislation.

Assistive Devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. We will ensure that all staff, volunteers and others dealing with the public are trained and familiar with various assistive devices that may be used by clients with disabilities while accessing our services.

All staff, volunteers and others dealing with the public will know how to use the assistive devices available on our premises for clients.

Telephone Services

We are committed to providing fully accessible telephone service to our clients. We will train employees to communicate with clients over the telephone in clear and plain language and to speak clearly and slowly.

All staff, volunteers and others dealing with the public will offer to communicate with clients by e-mail, fax or hand delivery if telephone communication is not suitable to their communication needs or is not available.

Orders and Billing

Where applicable, we are committed to providing accessible invoices to all of our clients and suppliers. For this reason, invoices will be provided in the following formats upon request: hard copy, e-mail or fax.

All staff, volunteers and others dealing with the public will answer any questions that clients may have about the content of the invoice in person, by telephone or email.

Service Animals

We are committed to welcoming people with disabilities who are accompanied by a service animal on parts of our premises that are open to the public and other third parties.

All staff, volunteers and others dealing with the public will be properly trained in how to interact with people with disabilities who are accompanied by a service animal.

Support Persons

We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter Gillons' premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

Notice of Temporary Service Disruption

Gillons will provide clients with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed in conspicuous places, including Front Doors as well as by other means such as on our website that will ensure that the notice reaches those persons potentially affected by the temporary disruption.

Feedback System

The ultimate goal of Gillons is to meet and surpass client expectations while serving client with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way Gillons provides services to people with disabilities can be made verbally in person, by phone, by mail, by fax or online. If you receive any feedback about our service to clients with disabilities, or an inquiry as to how to leave feedback, please advise them to contact the Operations Manager either in person, in writing, by telephone or by e-mail.

Upon receipt of any complaints, The Operations Manager, will investigate the matter with the appropriate personnel and provide a response within thirty (30) days.

INFORMATION AND COMMUNICATIONS

Communication

Gillons is committed to meeting the communication needs of people with disabilities. We shall notify the public and our employees of the availability of accessible formats and communication supports when requested. Upon request and in consultation with the person making the request, we shall provide, in a timely manner, accessible formats and communication supports for information and communication that takes into account the person's disability. This includes publicly available information about our goods, services and facilities, emergency information and feedback processes.

Where information or communications cannot be provided in an accessible format or with communication supports, for example, if it is not technically feasible, Gillons will provide an explanation as to why the information or communication cannot be provided in an accessible format.

Internet websites and web content controlled directly by the Organization or through a contractual relationship that allows for modification of the site will confirm to the World Wide Web Consortium

Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA In accordance with the schedule set out in the ISAR.

Emergency Procedures, Plans and Information

Gillons will provide, upon request, all existing public emergency procedures, plans and public safety information in an accessible format or with appropriate communication supports in a timely manner upon request.

TRAINING

Customer Service Standard

Gillons will provide training on the Customer Service Standard requirements under the AODA to all employees and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures.

Applicable staff will be trained on policies, practices and procedures that affect the way services are provided to people with disabilities. Staff will also be trained on an on-going basis when changes are made to these policies, practices and procedures.

Gillons will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Integrated Accessibility Standard

Gillons is committed to training employees, persons who deal with the public or other third parties on their behalf and other persons involved in developing policies on Ontario's accessibility laws and on accessibility aspects of the Ontario *Human Rights Code* that apply to persons with disabilities.

Training will be provided in a way that best suits the duties of employees, and other staff members, and will be on-going where there are any changes to these policies. Training will take place as soon as is practicable and upon completion, records of training will be kept and will be available for inspection as may be required.

EMPLOYMENT STANDARDS

Recruitment

Gillons shall post information about the availability of accommodation for job applicants with disabilities in the recruitment process. Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for material to be used in the process are available, upon request. When the applicant requests accommodation, Gillons shall consult with the applicant to arrange for accommodation in a manner that takes into account the applicant's disability.

Employee Supports

Gillons will inform its employees of the policies used to support employees with disabilities, including accommodation policies 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 and updated information will be provided to all employees whenever there is a change to existing accommodation policies.

Accessible Formats and Communication Supports for Employees

Upon an employee's request, Gillons will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform the employee's job; and
- Information that is generally available to employees in the workplace.

Gillons will consult with the employee making the request in determining the suitability of the accessible format or communication supports.

Workplace Emergency Response Information

Individual workplace emergency response procedures will be provided to an employee with a disability where it is necessary. In addition, this information will be provided, with the employee's consent, to the person designated to provide assistance. The information will be reviewed whenever the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when Gillons reviews its emergency response place.



Documented Individual Accommodation Plans

A written process for the development and maintenance of documented individual accommodation plans will be developed for employees with disabilities. Upon request, these plans will include information regarding accessible formats and communication supports and individualized workplace emergency response information.

Return to Work Process

Gillons will have in place a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. The return to work process will outline the steps Gillons will take to facilitate the return to work.

Performance Management and Career Development and Redeployment

Gillons shall take into account the accessibility needs of its employees with disabilities when providing career development, performance management and when considering redeployment.

DESIGN OF PUBLIC SPACES

Gillons will meet the Accessibility Standards for the Design of Public Spaces when undertaking new construction and redevelopment of public spaces.

Public spaces include:

- Recreational trails and beach access routes
- Outdoor public eating areas (e.g. rest stops or picnic areas)
- Outdoor play spaces
- Outdoor paths of travel (e.g. sidewalks, ramps, stairs)
- Accessible parking
- Service-related elements (e.g. service counters, fixed queuing lines and waiting areas)

MODIFICATIONS TO THIS POLICY

Any Gillons policies that do not respect and promote the dignity and independence of people with disabilities will be modified or removed. Our policies are maintained and updated regularly to reflect legislative changes and changes in our practices.

As we are committed to developing accessibility policies that respect and promote the dignity and independence of people with disabilities, no changes will be made to this policy before considering the impact on people with disabilities.



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FURTHER INFORMATION

If anyone has a question about these Accessibility Policies, please contact:

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A copy of these Accessibility Policies is available upon request by contacting Human Resources.