

## **ACCESSIBILITY POLICY**

Policy No: 005

Issue Date: October 1, 2013

Last Reviewed: March 2021

Last Revised: March 1, 2021

### **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, The Accessibility Standards for Customer Service came into effect on January 1, 2008 and the Integrated Standard 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;
- Accessibility Plan;
- Annual Report;
- Accessible Information and Communication Standards;
- Accessible Employment Standards;
- Accessibility Standard for the Design of Public Spaces.
- Transportation (not applicable to our organization).

### **Statement of Commitment and Accountabilities Commitment**

Gore Mutual 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. Gore Mutual is committed to, and strives to ensure that, the AODA, the standards and all other relevant legislation concerning accessibility, are rigorously observed. Gore Mutual 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.

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People with disabilities will be given an equal opportunity to obtain, use and benefit from Gore Mutual's products and services in a way that is respectful of the dignity and independence of people with disabilities and in a manner which takes into account the person's disability.

All goods and services provided by Gore Mutual shall follow the principles of dignity, independence, integration and equal opportunity<sup>1</sup>.

Gore Mutual 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 Gore Mutual.

### **Accountabilities**

Gore Mutual Executive team is accountable to and responsible for:

- The governance of the policy.
  - Corporate liability for compliance with legislative requirements, including fiscal responsibility and human rights issues.
  - Supporting and promoting the policy in their area of direct report and throughout the organization.
  - Driving the culture to a high level of understanding regarding disability and accommodation.

Gore Mutual Leaders are accountable to and responsible for:

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

Gore Mutual Employees are accountable to and responsible for:

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

Gore Mutual 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 leaders on their obligations under the policy.

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<sup>1</sup>See the definitions of dignity, independence, integration and equal opportunity in Schedule 1.

## Scope

- a) This policy applies to the provision of goods and services at premises owned and/or operated by Gore Mutual as well as any interactions with employees and customer/clients via telephone, email or written mail.
- b) This policy includes all the requirements as stated under both the Customer Service Standard and the Integrated Accessibility Standard Regulations (IASR).
- c) This policy will be reviewed and amended, as required, when additional accessibility related Regulations are enacted by the Government of Ontario and when changes are made to the legislation framework governing accessibility.

## 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 customer/clients 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<sup>2</sup>:

- 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.

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<sup>2</sup> Ontario Human Rights Code, R.S.O. 1990, Chapter H.19, Section 10(1)(a-e), Service Ontario e-Laws, 2006, 03 April 2009, [http://www.e-laws.gov.on.ca/html/statutes/english/elaws\\_statutes\\_90h19\\_e.htm](http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90h19_e.htm)

- 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.

#### Barrier:

As defined by the AODA, 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 procedural 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<sup>3</sup> 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.

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<sup>3</sup> Ontario *Regulation 429/07*, Section 4(9)(a-b)

**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.

**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, closed 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, entitles "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 an 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:

Gore Mutual shall do the following:

- Notify its employees and the public about the availability of accommodation for applicants with disabilities in the recruitment processes.
- Notify job applicants when they are selected to participate in an assessment or selection process that accommodations are available, in relation to the materials or processes to be used.
- Consult with the applicant to provide or arrange for the provision of suitable accommodation that takes into account the applicant's accessibility needs.

## **AODA Policy, Practice and Procedure**

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

Gore Mutual will make every reasonable effort, subject to health and safety concerns, to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- striving to ensure that all customers receive the same value and quality;
- 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 Gore Mutual.

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.

### **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 pit bulls) 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, Gore Mutual 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, Gore Mutual 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, Gore Mutual 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, Gore Mutual 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 of Gore Mutual. Revised training will be provided in the event of changes to legislation or Gore Mutual's policy, practice and procedure. Gore Mutual will ensure that persons have been trained on all of the requirements of the Customer Service Standard, The IARS and the Ontario Human Rights Code, as it pertains to persons with disabilities. Gore Mutual will keep a record of training that includes the dates training was provided and the number and identity of employees who were trained.

The 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 Gore Mutual'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
- Company policies, procedures and practices pertaining to AODA

### **Notice of Disruptions in Service**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Gore Mutual. 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<sup>4</sup>.

### **Feedback Process**

Gore Mutual shall provide customers/clients with the opportunity to provide feedback on the service, goods and facilities provided to persons with disabilities. Feedback is available in accessible format and with communication supports. 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.

Customers can submit feedback to: **Chief Human Resources Officer**

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<sup>4</sup>See **Availability and Format of Documents** section (page 10) for further information

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

All documents required by the Regulation, including Gore Mutual's Accessibility Policy, notices of temporary disruptions, training policy, 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, Gore Mutual 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 Gore Mutual's website at:

[www.goremutual.ca](http://www.goremutual.ca)

Gore Mutual shall 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 will be given by posting the information in a conspicuous place owned and operated by Gore Mutual, the website and/or any other reasonable method. In the event that a notification of disruption 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 Gore Mutual does not control directly or indirectly through a contractual relationship.

If Gore Mutual 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 as well as a summary of the unconvertible information or communications.

### **Accessibility Plan**

Gore Mutual 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 be:

- Posted on Gore Mutual'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.

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## **Annual Status Reports**

Gore Mutual will prepare an annual status report on the progress of measures taken to implement the Multi-Year Accessibility Plan. The status report will be posted on the company website and will be provided in an accessible format, upon request, as soon as is practicable.

## **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**

Gore Mutual 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 Gore Mutual's Integrated Accessibility Policy apply only to employees of Gore Mutual. They do not apply to volunteers or other non-paid individuals.

### **Notice to Successful Applicants**

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

### **Informing Employees of Support**

Gore Mutual 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 Gore Mutual. 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, Gore Mutual 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**

Gore Mutual 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 Gore Mutual 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 Gore Mutual reviews its general emergency response policies.

## **Documented Individual Accommodation Plans**

Gore Mutual 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**

Gore Mutual 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**

Gore Mutual 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.

## **Accessibility Standard for the Design of Public Spaces**

In accordance with this Standard, should Gore Mutual build new or make any major changes to the following, they shall do so in accordance to the accessibility standards under the Design of Public Spaces Standard.

- Outdoor public eating areas;
- Exterior paths of Travel;
  - Outdoor sidewalks and walkways;
  - Ramps;
  - Stairs; and
  - Curb ramps
- Parking; and
- Service Counters, Queuing Guides and Waiting areas.

Gore Mutual will ensure that all accessible public spaces are maintained and remain barrier free.

## **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:

*Vice President, Human Resources*

## **Schedule 1**

### **Gore Mutual 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.