

Serving Customers with Disabilities

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”), comes into effect on January 1, 2012. The Regulation establishes accessibility standards specific to customer service for private sector organizations that provide goods and services to members of the public or other third parties.

This policy is a resource to ensure Stewart Morrison Insurance Brokers Limited is as accessible as possible to persons with disabilities, and in compliance with the regulations set forth by the Government of Ontario. As such, this policy mirrors the regulatory standards developed by, or in development by, the government and its representatives on the standards development committees.

These regulatory standards include:

1. Standard for Accessible Customer Service (*Accessibility Standards for Customer Service, Ontario Regulation 429/07*)
2. Standard for Accessible Information and Communication (January 1, 2014-2016)
3. Standard for Accessible Employment (January 1, 2014-2016)
4. Standard for Accessible Transportation (in development)
5. Standard for Accessible Built Environments (January 1, 2014-2016)

To fulfill these commitments, Stewart Morrison Insurance Brokers Limited will develop appropriate procedures, which will be monitored and reviewed, to ensure access and accommodation for all persons with disabilities.

The purpose of the Accessibility Policy is to:

- build awareness, within Stewart Morrison Insurance Brokers Limited and our community, of their rights and responsibilities to foster an accessible and inclusive environment with and for persons who have disabilities
- provide equal access to services and facilities
- provide equal opportunity in employment
- continual improvement of access to property, facilities and services
- define the development, publication, and review of its annual Accessibility Plan including participation of persons with disabilities
- provide quality services, both what we deliver and how we deliver services to all members of the Stewart Morrison Insurance Brokers Limited community
- ensure compliance with all regulatory standards legislated by the government of Ontario for accessibility of Ontarians with disabilities

The objective of the Customer Service Standard is to address the following with respect to service delivery to persons with disabilities:

- 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
- customer feedback

- training
- notice of availability and format of required documents

Statement of Commitment and Accountabilities

Commitment

Stewart Morrison Insurance Brokers Limited believes in and promotes the rights of all persons with disabilities as enshrined in the ***Human Rights Code***, the ***Accessibility for Ontarians with Disabilities Act (2005)*** and its related ***Accessibility Standards Regulations***. Stewart Morrison Insurance Brokers Limited also affirms the rights of all persons, including those with disabilities, to have access to equal opportunity in employment or business dealings with Stewart Morrison Insurance Brokers Limited.

Stewart Morrison Insurance Brokers Limited strives to provide an accessible environment for all persons with disabilities who interact with Stewart Morrison Insurance Brokers Limited.

Stewart Morrison Insurance Brokers Limited further affirms its commitment to promoting the following principles in all of its policies and interactions with persons with disabilities:

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.

Accountabilities

Stewart Morrison Insurance Brokers Limited will:

- Ensure all leaders and employees are aware of the Accessibility for Persons with Disabilities Policy and its application
- Hold all leaders and employees accountable for their responsibilities in related program elements and obligations
- Advocate and support accessibility through assigning internal responsibility, and aligning the required resources and behaviours to targeted initiatives, programs and policies
- Consider accessibility of people with disabilities as part of the regular development and ongoing review of existing policies and practices
- Amend existing policies as needed to comply with the Accessibility Standards once the relevant regulation is developed and proclaimed as law in any jurisdiction Stewart Morrison Insurance Brokers Limited operates

Leaders will:

- Communicate Stewart Morrison Insurance Brokers' Accessibility Policy to all employees
- Inform employees of their obligations and accountabilities to adhere to the requirements of the Policy as an element of their work performance and a condition of employment
- Implement, monitor and evaluate compliance of Accessibility Standards as they apply in their business unit
- Ensure employees are responding to requests for accommodation in a timely manner
- Ensure all complaints, or identified risks, about accessibility are dealt with in a timely manner

Human Resources will:

- Identify, develop and deliver required training on policy
- Review the Policy and procedures related to Accessibility Standards on an annual basis
- Monitor developments of the Accessibility Standards and communicate these developments to the business

Employees will:

- Support the implementation of the Accessibility Standards in the workplace
- Participate in required training related to the Accessibility Standards and Policy
- Promote the principals of dignity, independence, integration and equal opportunity when providing customer service
- Forward feedback from customers regarding the Accessibility Standards to their leader

Scope

a) This policy applies to the provision of goods and services at premises owned and/or operated by Stewart Morrison Insurance Brokers Limited as well as any interactions with employees and customer/clients via telephone, email or written mail.

b) This policy applies to employees as well as volunteers, agents and/or contractors who deal with the public or other third parties that interact with Stewart Morrison Insurance Brokers Limited.

Definitions

Disability: The definition of disability used in this policy is the same as that used by the *Accessibility for Ontarians with Disabilities Act (2005)* and the *Human Rights Code*. That is, a disability is:

(a) 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

(b) a condition of mental impairment or a developmental disability

(c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language

(d) a mental disorder, or

(e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*

Assistive Device: A device used to assist persons with disabilities in carrying out activities or in accessing the services of our organization. This could include technical devices such as communication devices or personal assistive devices such as a walker

Support Person: An individual hired or chosen by a person with a disability to provide service or assistance with communication, mobility, personal care, medical needs or access to goods or services

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

Customers: Include our direct customers and third party providers that represent us

Barriers: As defined by the AODA, 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

Customer Service Policy

Stewart Morrison Insurance Brokers Limited respects the dignity and independence of persons with disabilities while providing equal opportunity to receive services in an integrated manner. The components of our policy are outlined below.

Standard for Accessible Customer Service

Assistive Devices

In such cases where a person with a disability requires the use of their own personal assistive devices in order to access the goods and services provided by Stewart Morrison Insurance Brokers Limited, they are welcome to do so. Assistive devices include, but are not limited to the following examples: hearing aids, wheelchairs, electronic organizers, magnifying devices, electronic voice synthesizers.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to facilitate the access to goods and services.

Guide Dogs and Service Animals

Persons with disabilities, who rely on the use of guide dogs or service animals, are welcome to bring such animals with them to Stewart Morrison Insurance Brokers Limited in order to access the goods and services provided. The only exception to this practice is where such animals are prohibited 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, Stewart Morrison Insurance Brokers Limited 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, Stewart Morrison Insurance Brokers Limited may request verification from the customer, which 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

Support Persons

If the use of a support person is required in order to access the goods and services provided by Stewart Morrison Insurance Brokers Limited, persons with disabilities are welcome to have the support person present when interacting with Stewart Morrison Insurance Brokers Limited. If necessary, Stewart Morrison Insurance Brokers Limited will request written authorization to validate that the support person can act on the customer's behalf.

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

Communication

Stewart Morrison Insurance Brokers Limited will ensure all members of the organization strive to communicate with a person with a disability in a manner that takes into account his or her disability. All employees will be trained on how to interact and communicate with customers with disabilities. We will offer alternative communication and document formats that will meet the needs of customers with disabilities as promptly as feasible.

Training

Training will be provided to all employees and volunteers that interact with the public on behalf of Stewart Morrison Insurance Brokers Limited. Training will be provided as soon as practicable upon the individual being assigned the applicable duties as well as on an ongoing basis as changes occur to Stewart Morrison Insurance Brokers Limited's policies, procedures and practices relating to the provision of services to persons with disabilities.

Stewart Morrison Insurance Brokers Limited 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 be conducted in an online format and will include information on the purposes of the AODA, requirements of this Regulation, how to communicate and interact with people with disabilities, how to interact with service animal or support person, how to utilize assistive devices that are available at our premises, what to do if a person has difficulty accessing Stewart Morrison Insurance Brokers Limited's services or facilities, and our policies, procedures and practices pertaining to accessibility.

Contractors and agents providing services to the public on behalf of Stewart Morrison Insurance Brokers Limited will also be required to ensure their staff has received the appropriate training.

Disruption of Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Stewart Morrison Insurance Brokers Limited. 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.

Notification will be given by posting the information in a conspicuous place owned and operated by Stewart Morrison Insurance Brokers Limited, 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

Feedback Process

Customers will have an opportunity to provide feedback on how Stewart Morrison Insurance Brokers Limited provides goods or services to people with disabilities. This feedback will be received by Stewart Morrison Insurance Brokers Limited's Human Resources Department and feedback will be forwarded to the relevant business unit. Stewart Morrison Insurance Brokers Limited will respond to any feedback and take action on any complaints immediately. 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 made available upon request.

Policy Communication

Stewart Morrison Insurance Brokers Limited will post this policy and associated documentation on Stewart Morrison Insurance Brokers Limited's website.

Availability and Format of Documents (Alternative Formats)

All documents required by the accessibility standards Regulation, as well as related policies

including Stewart Morrison Insurance Brokers Limited's Accessibility Policy, notices of temporary disruptions, training policy, and written feedback process are available upon request.. When providing these documents to a person with a disability, Stewart Morrison Insurance Brokers Limited 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 Regulation will be posted under *Resources* on the Stewart Morrison Insurance Brokers Limited's website at:

<http://www.stewartmorrison.ca>

Stewart Morrison Insurance Brokers Limited shall notify customers that the documents related to the accessibility standards Regulation are available upon request and in a format that takes into account the customer's disability.

Standard for Accessible Information and Communication

Emergency Procedures, Plans or Public Safety Information

In preparing emergency procedures, plans and/or public safety information documents, Stewart Morrison Insurance Brokers Limited will ensure that all documents that are made available to the public shall be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Stewart Morrison Insurance Brokers Limited is committed to ensuring its communications and information is accessible. This aspect of the policy will be developed more fully once the relevant regulation is developed and proclaimed as law by the government of Ontario.

Standard for Accessible Employment

Workplace Emergency Response Information

Should any employee at Stewart Morrison Insurance Brokers Limited with a disability, whether permanent or temporary, require a personalized workplace emergency response plan, Stewart Morrison Insurance Brokers Limited will create such document as soon as the information is provided from the employee. Stewart Morrison Insurance Brokers Limited will assign an employee, with his/her consent, to assist the person with a disability in the event of an emergency.

This information shall be reviewed:

- If the employee moves to a different location in the organization
- If the employee's overall accommodation needs or plans may change, and
- When Stewart Morrison Insurance Brokers Limited reviews its general emergency response policies

Stewart Morrison Insurance Brokers Limited is committed to ensuring its employment practices are accessible. This aspect of the policy will be developed more fully once the relevant regulation is developed and proclaimed as law by the government of Ontario.

Standard for Accessible Transportation

Stewart Morrison Insurance Brokers Limited is committed to ensuring its transportation services are accessible. This aspect of the policy will be developed more fully once the relevant regulation is developed and proclaimed as law by the government of Ontario.

Standard for Accessible Built Environments

Stewart Morrison Insurance Brokers Limited is committed to ensuring its buildings are accessible. This aspect of the policy will be developed more fully once the relevant regulation is developed and proclaimed as law by the government of Ontario.

Review and Administration

All areas of Stewart Morrison Insurance Brokers Limited are accountable for ensuring that the principles of this policy are upheld. However, it is the responsibility of Human Resources to ensure that this policy is reviewed every three years and/or as required to ensure adherence to developing law (i.e., regulatory standards for accessibility).

Should you have any questions or concerns about this policy or related procedures please contact:

Emily Avery-Graves, Business Development Manager

Customer Service Feedback Form

Please tell us the date and time of your visit or interaction with Stewart Morrison Insurance Brokers Limited.

Please tell us which service, location, department or unit you dealt with.

What was the purpose of your visit or interaction?

How satisfied were you with the customer service you received from Stewart Morrison Insurance Brokers Limited? (Circle one)

Very Satisfied

Satisfied

Dissatisfied

Very Dissatisfied

Was our customer service provided to you in an accessible manner? (Circle one)

Yes

No

Suggestions to improve our service/additional comments.

Would you like a Stewart Morrison Insurance Brokers Limited Insurance Representative to follow up with you regarding your feedback? (Circle one)

Yes

No

If yes, please fill out your preferred contact method/information.
