Accessible Customer Service Policy (AODA) - Ontario

Intent

Howick Mutual Insurance is committed to providing accessible customer service in accordance with the *Integrated Accessibility Standards* regulation (IASR) under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). This policy sets out the standards for the provision of goods, services, and facilities.

Definitions

Guide dog: A dog trained as a guide for a blind person that has completed a training program at a designated training facility set out in the *Guide Dogs* regulation.

Service animal: An animal is a service animal for a person with a disability if:

- The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators, such as the vest or harness worn by the animal; or
- The person provides documentation from a designated regulated health professional as permitted by the IASR, confirming that the person requires the animal for reasons relating to the disability.

Support person: In relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs, or access to goods, services, and facilities.

Guidelines

Howick Mutual Insurance makes every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Allowing customers with disabilities to do things in their own ways and at their own pace when accessing goods, services, and facilities, as long as this does not present a health or safety risk;
- Using alternative methods of access when necessary to ensure that customers with disabilities have access to the same goods, services, and facilities in a similar manner;
- Taking into account individual accommodation needs when providing goods and services; and

- Communicating in a manner that takes into account a customer's disability.

Upon request, the company provides a person with a disability with a copy of this policy, or the information contained within it, in a format that meets their accessibility needs. Requests should be directed to Human Resources.

Persons with disabilities may use their own assistive devices and company-provided assistive devices as required when accessing goods or services or facilities. If the assistive device presents a health or safety concern or where accessibility might be an issue, employees should inform Human Resources so that other reasonable measures can be put in place to ensure the access of goods and services.

Guide Dogs and Service Animals

A customer with a disability who is accompanied by a guide dog or other service animal is welcome to access to premises that are open to the public and keep the animal with them unless the animal is otherwise excluded by law. "No pet" policies do not apply to guide dogs or service animals. If a customer's guide dog or service animal is excluded by law, Howick Mutual Insurance offers alternative methods to enable the person with a disability to access goods, services, and facilities.

If it is not readily apparent that the animal is a guide dog or service animal, employees may respectfully ask whether an animal is a guide dog or service animal but must not ask the nature of the person's disability or purpose of the animal. If they reveal the animal is not a guide dog or service animal, they should be asked to remove the animal from the premises promptly.

The customer who is accompanied by a guide dog or service animal is responsible for maintaining control of the animal at all times. If a service animal becomes out of control, causing a clear disruption or a threat to the health or safety of others, and the animal's behaviour is not corrected by the owner, this should be reported to Human Resources, who may ask them to remove their service animal from the premises.

Support Persons

If a customer with a disability is accompanied by a support person, Howick Mutual Insurance will ensure that both persons may enter the premises together and that the customer is not prevented from having access to the support person. In situations where confidential information might be discussed, consent must be obtained from the customer before any potentially confidential information is mentioned in the presence of the support person.

The company may require a person with a disability to be accompanied by a support person while on the premises if the support person is required to protect the health or safety of the person with the disability or others in the workplace and there are no other reasonable measures that can be taken to ensure this. The company consults the

person with the disability and assesses available evidence before making such a decision. Employees are informed of any such arrangements.

Notice of Temporary Disruptions

Howick Mutual Insurance makes all reasonable efforts to provide notice of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use goods or services. In some circumstances, notice may not be possible.

When disruptions occur without notice, the company informs customers by:

- Posting written notices in conspicuous places, including at the point of disruption and all entrances;
- Informing customers verbally upon arrival;
- Contacting customers with appointments; and
- Any other method that may be reasonable under the circumstances.

The following information is provided regarding the disruption, unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Expected duration; and
- A description of alternative services or options that are available.

Employees are informed of this information as soon as reasonably possible in the event of a disruption so that they can inform customers and respond to questions.

Training

Training is provided to employees, volunteers, those who participate in the development of company policies, and any other person who provides goods, services, or facilities on behalf of the company. Training is provided on the accessibility standards found in the IASR and on the *Human Rights Code* that is appropriate for the duties they complete while at work.

Training specific to the customer service standards covers the following:

- A review of the purpose of the AODA;
- A review of the requirements of the customer service standards;
- Instructions on how to interact and communicate with people with various types of disabilities;
- Instructions on how to interact with people with disabilities who use assistive devices or
require the assistance of a guide dog or other service animal or a support person;

- Instructions on how to use equipment or devices that are available at the company's premises or that the company provides that may help people with disabilities;
- Instructions on what to do if a person with a disability is having difficulty accessing the company's services; and
- Policies, procedures, and practices of the company pertaining to providing accessible customer service to customers with disabilities.

Howick Mutual Insurance provides training as soon as practicable. Training is provided to new employees, volunteers, agents, and contractors. Revised training is provided in the event of changes to legislation, procedures, policies, or practices.

The company keeps a record of training that includes the dates training was provided and the number of employees who attended the training. Where required, retraining is provided to ensure compliance with the company's policies and procedures.

Customer Feedback

Howick Mutual Insurance has established a feedback process to provide the public with the opportunity to provide feedback on how goods, services, and facilities are provided to customers with disabilities. Feedback may be shared verbally (in person or by telephone) or in writing (handwritten, delivered, website, or e-mail).

The company addresses feedback received on a case-by-case basis and takes any actions necessary to remedy any issues. Customers who wish to submit feedback should be directed to:

Tammy Hickling, VP of Operations

1-800-265-3033, ext 225

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