Accessibility Standard for Customer Services

At Irwin, Sargent & Lowes Limited (hereinafter referred to as "ISL"), we are committed to meeting the requirements of the accessibility standards, established by Accessibility for Ontarians with Disabilities Act (AODA), 2005, Customer Service Standard regulations. Accessibility Standards for Customer Service applies to every organization and to every person or organization that provides goods or services to members of the public or other third parties and that has at least one employee in Ontario. The Workplace Accessibility Barriers Assessment is an organization wide assessment that aims at ensuring that we meet the legislative requirements as set out in Bill 118, the Accessibility for Ontarians with Disabilities Act, Customer Service Standard for January 1, 2012 and continue to do so through periodic assessments.

Our Mission

To make reasonable efforts to ensure that policies, procedures, and practices, pertaining to the provision of goods and services to the public and other third parties, align with the independence, dignity, integration and equal opportunity guiding principles, as set out in Bill 118.

ISL values excellence in customer service for everyone who may benefit from our goods and services. This policy supports the principles as it provides respectful services that focus on the unique needs of each individual. This policy enables ISL to ensure that persons with disabilities have access to accessible and exceptional customer service.

Our Commitment

In fulfilling our mission, ISL aims at all times to provide its goods and services in a way that respects the dignity and independence of people with disabilities. We are committed to giving people with disabilities the same opportunity to access our goods and services.

Through these policies and procedures, ISL aims to be respectful to the dignity and independence of persons with disabilities and we are committed to providing accessible integrated programs and services that are designed to meet individual needs.

Definitions

Disability includes, but is not limited to, the following:

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.

Accessible shall mean capable of being entered or reached, approachable; easy to get at; capable of being influenced, obtainable; able to be understood or appreciated.

Barrier shall mean anything that keeps someone with a disability from fully participating in all aspects of society because of their disability. Barriers can be visible and invisible. They can be: architectural, physical, communication, attitudinal, technological and organizational.

Assistive Device shall mean a device used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by the Customer Service Standard. Assistive devices help people with a variety of disabilities. Here are some examples:

For people who have vision loss: magnifier - makes print and images larger and easier to read, white cane - helps people find their way around obstacles

For people who are deaf, deafened, oral deaf, hard of hearing: hearing aid - makes sound louder and clearer, teletypewriter (TTY) - helps people who are unable to speak or hear to communicate by phone

For people who have physical disabilities: mobility device (e.g., a wheelchair, scooter, walker, cane, crutches) - helps people who have difficulty walking

For people who have learning disabilities: electronic notebook or laptop computer - used to take notes and to communicate

For people who have intellectual/developmental disabilities: communication boards that are used to pass on a message by pointing to symbols, words or pictures

Guide Dog shall mean a dog trained as a guide for a person who is blind and having the qualifications prescribed by the appropriate regulations.

Goods and Services shall mean goods and services provided by ISL.

Service Animals shall mean animals that are used as a service animal for a person with a disability.

Support Person shall mean an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services.

Irwin, Sargent & Lowes Limited reserves the right to alter, modify, amend or change human resources policies at its sole discretion. Employees will be provided appropriate notice of any changes to policy.

<u>Policy</u>

This policy applies to ISL staff members, including full time, part time and contractors, who deal with the public, or other third parties, as well as persons involved in developing policies, procedures, and practices pertaining to the provision of goods and services to the public or other third parties.

Procedure

ISL is committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:

Communication

- 1. We will communicate with people with disabilities in ways that take into account their disability.
- 2. We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities.

Telephone services

- 1. We are committed to providing fully accessible telephone service to our customers. We will train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly.
- 2. We will offer to communicate with customers by email or home visits if telephone communication is not suitable to their communication needs or is not available.

Assistive devices

- 1. We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. We will ensure that our staff is trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods or services.
- 2. 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 or ramps are not present and where an individual requires assistive devices for the purpose of mobility, service will be provided in a location that meets the needs of the customer.

Billing

1. We are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in the following formats upon request: hard copy, large print, e-mail. 2. We will answer any questions customers may have about the content of the invoice in person, by telephone or email as required.

Use of service animals and support persons

- We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal. If a health and safety concern presents itself for example, in the form of a severe allergy to the animal, ISL will make all reasonable efforts to meet the needs of all individuals.
- 2. 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 ISL 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. Fees will not be charged for support persons. 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 disruption

- 1. ISL will provide customers 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.
- 2. The notice will be placed at all public entrances and at reception on our premises.

Training for staff

- 1. ISL will provide training to all employees, volunteers 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. Individuals in the following positions will be trained customer service representatives, sales associates, administration and managers.
- 2. This training will be provided within one month after staff commence their duties.
- 3. Training will include the following:
 - The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
 - How to interact and communicate with people with various types of disabilities

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- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- What to do if a person with a disability is having difficulty in accessing ISL's goods and services
- ISL's policies, practices and procedures relating to the customer service standard.
- 4. Applicable staff will be trained on policies, practices and procedures that affect the way goods and services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.
- 5. An Accessibility Standard for Customer Services Acknowledgement Form (F1-01) will be signed upon completion of the training and maintained in the employee personnel file.

Feedback process

- 1. The ultimate goal of ISL is to meet and exceed customer expectations in serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.
- Feedback regarding the way ISL provides goods and services to people with disabilities can be made by using the Accessibility Standard for Customer Services Feedback Form (F1-02). This form will be made available on our website or at reception. Alternate methods of providing feedback such as verbally (in person or by telephone) or written (e-mail, fax, regular mail or delivered) will be available upon request.
- 3. All feedback will be directed to the Office/Finance Manager. Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns that were submitted within five (5) business days.

Modifications to this or other policies

We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities. Any policy of ISL that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

Questions about this policy

This policy exists to achieve service excellence for customers with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to, the Office/Finance Manager of ISL.

Brokerages with 20 or more employees, must also comply with the following requirements:

- 1. We will complete an online report on our compliance by the reporting deadline in 2012.
- 2. ISL will document in writing all of our policies and procedures on how we provide accessible customer service.
- 3. We aim to notify customers that all of the documents required by the Customer Service Standard are available upon request.
- 4. When providing documents required under the Customer Service Standard, ISL will ensure that the information is in a format that takes into account the person's disability.

ISL is committed to developing, implementing and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods and services. Our policies and procedures will aim at making our customer service operations accessible to people with disabilities.

This Customer Service Policy is to be posted and retained in a clearly noticeable location in the workplace.

ISL is committed to reviewing this policy on an annual basis, or more frequently where necessary.

Further information on any of the above policies and the applicable programs and procedures can be obtained from the Office/Finance Manager of ISL

References

Insurance Brokers Association Ontario, <u>www.IBAO.org</u> Accessibility for Ontarians with Disabilities Act (AODA) Training Introduction to AODA Accessibility Customer Service Standard

Ministry of Community and Social Services, <u>www.ontario.ca/AccessON</u>

Accessibility for Ontarians with Disabilities Act (AODA), 2005

<u>Forms</u>

- F1 01 Accessibility Standard for Customer Services Acknowledgement Form
- F1 02 Accessibility Standard for Customer Services Feedback Form