

INTEGRATED ACCESSIBILITY STANDARDS POLICY

The following policy has been established by Pembridge Insurance Company (Pembridge) to govern the provision of services with Ontario Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the *Accessibility for Ontarians with Disabilities Act, 2005*.

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

Pembridge is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

Commitment

Pembridge is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons 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.

This policy will be implemented in accordance with the time frames established by the Regulation.

Accessibility Plan

Pembridge will develop, maintain and document an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the company's website. Upon request, Pembridge will provide a copy of the Accessibility Plan in an accessible format. For example: reading written information aloud to the person directly, electronic formats (email, MS Word, HTML), large print documents, accessible audio formats, etc.

Self-Service Kiosks

Pembridge will have consideration for accessibility when designing, procuring or acquiring self-serve kiosks to better serve persons with disabilities.

Training Employees and Volunteers

Pembridge will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to persons with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing Pembridge's policies; and,
- all other persons who provide goods, services or facilities on behalf of the company

The training will be appropriate to the duties of the employees, volunteers and other persons.

Employees will be trained when changes are made to the accessibility policy. New employees will be trained within 2 (two) weeks of commencing employment at Pembridge through the company's Code of Ethics program.

Pembridge will keep a record of the training it provides.

INFORMATION AND COMMUNICATIONS STANDARDS

Feedback

Pembridge will continue to ensure that its process for receiving and responding to internal and external feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

Accessible Formats and Communication Supports

Upon request, Pembridge will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

Pembridge will consult with the person making the request in determining the suitability of an accessible format or communication support.

Pembridge will also notify the public about the availability of accessible formats and communication supports. Upon request, we will arrange for an alternative accessible communication format for receiving and responding to customer/employee feedback.

Accessible Websites and Web Content

Pembridge will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and to Level AA by January 1st, 2021 in accordance with the legislated deadlines, except where this is impracticable.

EMPLOYMENT STANDARDS

Recruitment

Pembridge will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process

Pembridge will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, Pembridge will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, Pembridge will notify all successful applicants of its policies for accommodating employees with disabilities.

Informing Employees of Supports

Pembridge will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Pembridge will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, Pembridge will consult with the employee making the request.

Workplace Emergency Response Information

Pembridge will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Pembridge is aware of the need for accommodation due to the employee's disability. Pembridge will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, Pembridge will, with the consent of the employee, provide the workplace emergency response information to the person designated by Pembridge to provide assistance to the employee.

Pembridge will review the individualized workplace emergency response information when the employee moves to a different location in the organization or when the employee's overall accommodations needs or plans are reviewed.

Documented Individual Accommodation Plans

Pembridge will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

Return to Work Process

Pembridge maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps Pembridge will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (i.e., the *Workplace Safety Insurance Act, 1997*).

Performance Management, Career Development and Advancement & Redeployment

Pembridge will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

Questions about this policy

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. If anyone has a question about the policy, or if the purpose of the policy is not understood, please contact:

- Phone: (905) 475-4522
- Toll Free: 1-877-726-6786
- Fax: (905) 513-4018
- Email: ombudsman@helpforyou.ca
- By mail: Ombudsman, 27 Allstate Parkway, Suite 100, Markham, Ontario L3R 5P8
- Verbally to any Pembridge Manager.

Note that all the above requirements will be implemented in accordance with the legislated deadlines. Refer to [Ontario Regulation 191-11 Integrated Accessibility Standards](#) for more information.