

# Accessibility for Ontarians with Disabilities Act (AODA), 2005

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## Pembridge Insurance Company (PIC) Integrated Accessibility Standards Multi-Year Plan

### Part I – General Requirements

#### Section 3 Establishment of Accessibility Policies

3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.

##### *PIC Commitment*

PIC Policy reviewed and posted on website.

##### Status

Completed September 2020

#### Section 4 Accessibility Plans

4.(1) Large organizations shall,

- a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;
- b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and
- c) review and update the accessibility plan at least once every five years.

##### *PIC Commitment*

Multi-year accessibility plan reviewed and posted on PIC website. [www.pembridge.com](http://www.pembridge.com)

##### Status

Completed November 2020

##### *PIC Commitment*

IASR Pembridge Insurance Company (PIC) Working Committee established and meeting as required. Meetings will continue to ensure compliance with all aspects of the IASR until completion in 2021.

##### Status

Completed and ongoing

### ***PIC Commitment***

Accessible Customer Service Plan posted on PIC website. [www.pembridge.com](http://www.pembridge.com)

#### Status

Completed and ongoing, latest update: November 2020

### ***PIC Commitment***

The Multi-year accessibility plan will be reviewed annually by the IASR Working Committee.

#### Status

Completed and ongoing, latest update: November 2020

### **Section 6 Self-Serve Kiosks**

6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

### ***PIC Commitment***

Not applicable to Pembridge Insurance Company as of November 2020. We will revisit every year when we review the accessibility plan.

### **Section 7 and 80.49 Training**

7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,

- a) all employees, and volunteers;
- b) all persons who participate in developing the organization's policies; and
- c) all other persons who provide goods, services or facilities on behalf of the organization.

80.49 Train all members of your organization on accessible customer service and how to interact with people with different disabilities.

### ***PIC Commitment***

Accessibility training is included in our Global Code of Ethics and reviewed annually.

#### Status

Completed and ongoing as new employees and volunteers join PIC effective January 1, 2015.

## **PART II – Information and Communications Standards**

### **Section 11 Feedback**

11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.

#### ***PIC Commitment***

PIC IASR Working Committee to conduct a review of all feedback processes (internally and externally).

Consider alternate feedback formats that comply with accessibility requirements, where practicable.

Implement alternate feedback formats, where practicable.

Train/communicate to PIC Managers about the alternate feedback formats and how to proceed if an alternate format is required.

Status

Completed and ongoing

### **Section 12 Accessible Formats & Communication Supports**

12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,

- a) in a timely manner that takes into account the person's accessibility needs due to disability; and
- b) at a cost that is no more than the regular cost charged to other persons.

#### ***PIC Commitment***

PIC IASR Working Committee to determine what accessible formats and communication supports could be made available upon request.

Implement alternate accessible formats and communication supports, where practicable.

Status

Completed and ongoing

### **Section 12 Accessible Formats & Communication Supports**

12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.

#### ***PIC Commitment***

Train/communicate to PIC Managers about the alternate accessible formats and communication supports available and how to proceed if required.

Status

Completed and ongoing

## **Section 12 Accessible Formats & Communication Supports**

12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.

### ***PIC Commitment***

Publish the availability of accessible formats and communication supports on PIC web sites. For

example:

“If you require any information in an alternate format, contact\_\_\_\_\_”.

“Alternate formats can be made available upon request”

Status

Completed and ongoing

## **Section 13 Emergency Procedures, Plans or Public Safety Info**

13.(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

### ***PIC Commitment***

Not applicable to Pembridge Insurance Company November 2020. . We will revisit every year when we review the accessibility plan.

## **Section 14 Accessible Websites & Web Content**

14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.

### ***PIC Commitment***

The PIC external web sites conform to WCAG 2.0 Level A and increasing to Level AA by January 1, 2021.

Status

All PIC external web sites comply with WCAG 2.0 Level A. We are working towards Level AA compliance for all our sites by 2021.

## **Section 15 Educational & Training Resources & Materials**

15.(1) Every obligated organization that is an educational or training institution shall do the following, if notification of need is given:

1. Provide educational or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person with a disability to whom the material is to be provided by,
  - a) procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or
  - b) arranging for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources or materials cannot be procured, obtained by other means or converted into an accessible format.
2. Provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities.

### ***PIC Commitment***

Not applicable to Pembridge Insurance Company as of November 2020. We will revisit every year when we review the accessibility plan.

## **Section 16 Training to Educators**

16.(1) In addition to the requirements under section 7, obligated organizations that are school boards or educational or training institutions shall provide educators with accessibility awareness training related to accessible program or course delivery and instruction.

(2) Obligated organizations that are school boards or educational or training institutions shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.

### ***PIC Commitment***

Not applicable to Pembridge Insurance Company as of November 2020. We will revisit every year when we review the accessibility plan.

### **Section 17 Producers of Educational or Training Material**

17.(1) Every obligated organization that is a producer of educational or training textbooks for educational or training institutions shall upon request, make accessible or conversion ready versions of the textbooks available to the institutions.

(2) Every obligated organization that is a producer of print-based educational or training supplementary learning resources for educational or training institutions shall upon request, make accessible or conversion ready versions of the printed materials available to the institutions.

#### ***PIC Commitment***

Not applicable to Pembridge Insurance Company as of November 2020. We will revisit every year when we review the accessibility plan.

### **Section 18 Libraries of educational & training institutions**

18.(1) Subject to subsection (2) and where available, the libraries of educational and training institutions that are obligated organizations shall provide, procure or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request.

(2) Special collections, archival materials, rare books and donations are exempt from the requirements of subsection (1).

#### ***PIC Commitment***

Not applicable to Pembridge Insurance Company as of November 2020. We will revisit every year when we review the accessibility plan.

## **PART III – Employment Standard**

### **Section 22 Recruitment - General**

22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

#### ***PIC Commitment***

PIC IASR Working Committee will review all stages of the recruitment process and ensure that accommodation is available at every stage of the recruitment process (e.g. job posting, interviewing, selection process, assessments, etc.) by including a statement that accommodations are available upon request.

For example:

“Allstate has policies and practices that provide workplace accommodations for people with disabilities. If you are selected for an interview and require accommodation, please let us know in advance.”

Status

Completed January 1, 2016 and ongoing

### **Section 23 Recruitment, Assessment or Selection Process**

23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.

(2) If a selected applicant requests an accommodation, the employer shall 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.

#### ***PIC Commitment***

PIC IASR Working Committee will review suitable accommodations that take into account the applicants’ accessibility needs.

Status

Completed January 1, 2016 and ongoing

### **Section 24 Notice to Successful Applicants**

24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.

#### ***PIC Commitment***

All PIC offer letters include a statement regarding our policies for accommodating employees with disabilities.

Status

Completed January 1, 2016 and ongoing

## **Section 25 Informing Employees of Supports**

25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.

### ***PIC Commitment***

The PIC IASR Working Committee has worked with the Internal Communications team and the Corporate Learning team to determine how to best inform current employees about PIC's policies to support employees with disabilities.

For example: Intranet bulletin, internal newsletter and/or e-mail communication, new offers of employment.

Corporate training for PIC Managers as required. PIC has incorporated these requirements into PIC's onboarding processes.

### **Status**

Completed January 1, 2016 and ongoing

## **Section 25 Informing Employees of Supports**

25.(3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

### ***PIC Commitment***

Refer to 25 (1) and (2) – any time there is a change to existing policies, we will re-communicate to all employees and update the onboarding process.

### **Status**

Completed and ongoing

## **Section 26 Accessible Formats & Communication Supports for Employees**

26.(1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,

- a) information that is needed in order to perform the employee's job; and
- b) information that is generally available to employees in the workplace.

### ***PIC Commitment***

PIC IASR Working Committee to determine what accessible formats and communication supports could be made available upon request. Implement alternate accessible formats and communication supports, where practicable.



Status

Completed and ongoing

### **Section 26 Accessible Formats & Communication Supports for Employees**

26.(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

#### ***PIC Commitment***

Employee are to work with their managers to request an alternate accessible format or communication support.

Status

Completed and ongoing

### **Section 27 Workplace Emergency Response Information**

27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.

#### ***PIC Commitment***

An employee who requires individualized assistance in the event of a workplace emergency will advise their manager and Facilities.

Status

Completed and ongoing

### **Section 27 Workplace Emergency Response Information**

(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

#### ***PIC Commitment***

To date, no PIC employee has come forward requesting individualized assistance in the event of a workplace emergency.

Should the need occur, PIC along with the employee will designate another employee to provide assistance in the event of a workplace emergency and the designate will be provided with the necessary emergency response information.

Status

Completed and ongoing

### **Section 27 Workplace Emergency Response Information**

(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.

#### ***PIC Commitment***

PIC will provide the emergency response information as soon practicable after PIC becomes aware of the need for accommodation.

#### **Status**

Completed and ongoing

### **Section 27 Workplace Emergency Response Information**

(4) Every employer shall review the individualized workplace emergency response information,

- a) when the employee moves to a different location in the organization;
- b) when the employee's overall accommodations needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies.

#### ***PIC Commitment***

The employee's Manager, Human Resources and Facilities will review the individualized workplace emergency response information when an employee moves to a different location in the organization or when their accommodation needs or plans are reviewed or when PIC reviews its general emergency response policies.

#### **Status**

Completed and ongoing

### **Section 28 Documented Individual Accommodation Plans**

28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.

#### ***PIC Commitment***

PIC IASR Working Committee will work with Human Resources to develop a plan and process to formalize the documented individual accommodation plans for employees with disabilities.

#### **Status**

Completed and ongoing

### **Section 28 Documented Individual Accommodation Plans**

28.(2) The process for the development of documented individual accommodation plans shall include the following elements:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.

3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.
4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
5. The steps taken to protect the privacy of the employee's personal.
6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

#### ***PIC Commitment***

Refer to Section 28 (1) above. All of the elements listed in Section 28 (2) will be incorporated into the documented individual plan.

#### **Status**

Completed and ongoing

#### **Section 29 Return to Work Process**

29.(1) Every employer, other than an employer that is a small organization,

- a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and
- b) shall document the process.

#### ***PIC Commitment***

PIC IASR Working Committee will work with Human Resources to compare the IASR requirements for employees with disabilities returning to work against our current return to work (RTW) process and ensure compliance. The process will be formally documented.

#### **Status**

Completed and ongoing

#### **Section 29 Return to Work Process**

29.(2) The return to work process shall,

- a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and
- b) use individual documented accommodation plans, as described in section 28, as part of the process.

### ***PIC Commitment***

Refer to Section 29 (1) above.

Status

Completed and ongoing

### **Section 29 Return to Work Process**

29.(3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.

### ***PIC Commitment***

All other RTW statutes will be reviewed and adhered to.

Status

Completed and ongoing

### **Section 30 Performance Management**

30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.

### ***PIC Commitment***

PIC IASR Working Committee will work with Human Resources to review the performance management process with respect to employees with disabilities.

Status

Completed and ongoing

### **Section 31 Career Development & Advancement**

31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.

### ***PIC Commitment***

PIC IASR Working Committee will work with Human Resources to review the career development and advancement process with respect to employees with disabilities.

Status

Completed and ongoing

### **Section 32 Redeployment**

32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

***PIC Commitment***

PIC IASR Working Committee will work with Human Resources to review the employee redeployment process with respect to employees with disabilities.

Status

Completed and ongoing

**PART IV – Transportation Standards**

**Section 33 to 80 Design of Public Spaces Standard Requirements**

***PIC Commitment***

Not applicable to Pembridge Insurance Company as of November 2020. We will revisit every year when we review the accessibility plan.

**PART IV.1 – Design of Public Spaces Standard (Accessibility Standards for the Built Environment)**

**Section 80.6 to 80.15 Recreational Trails and Beach Access Routes**

***PIC Commitment***

Not applicable to Pembridge Insurance Company. We will revisit every year when we review the accessibility plan.

**Section 80.16 to 80.17 Outdoor Public Use Eating Areas**

***PIC Commitment***

Not applicable to Pembridge Insurance Company. We will revisit every year when we review the accessibility plan.

**Section 80.18 to 80.20 Outdoor Play Spaces**

***PIC Commitment***

Not applicable to Pembridge Insurance Company. We will revisit every year when we review the accessibility plan.

## Section 80.23 Exterior paths of travel

When constructing new or redeveloping existing exterior paths of travel that they intend to maintain, obligated organizations, other than small organizations, shall ensure that new and redeveloped exterior paths of travel meet the following requirements:

1. The exterior path must have a minimum clear width of 1,500 mm, but this clear width can be reduced to 1,200 mm to serve as a turning space where the exterior path connects with a curb ramp.
2. Where the head room clearance is less than 2,100 mm over a portion of the exterior path, a rail or other barrier with a leading edge that is cane detectable must be provided around the object that is obstructing the head room clearance.
3. The surface must be firm and stable.
4. The surface must be slip resistant.
5. Where an exterior path has openings in its surface,
  - i. the openings must not allow passage of an object that has a diameter of more than 20 mm, and
  - ii. any elongated openings must be oriented approximately perpendicular to the direction of travel.
6. The maximum running slope of the exterior path must be no more than 1:20, but where the exterior path is a sidewalk, it can have a slope of greater than 1:20, but it cannot be steeper than the slope of the adjacent roadway.
7. The maximum cross slope of the exterior path must be no more than 1:20, where the surface is asphalt, concrete or some other hard surface, or no more than 1:10 in all other cases.
8. The exterior path must meet the following requirements:
  - i. It must have a 1:2 bevel at changes in level between 6 mm and 13 mm.
  - ii. It must have a maximum running slope of 1:8 or a curb ramp that meets the requirement of section 80.26 at changes in level of greater than 13 mm and less than 75 mm.
  - iii. It must have a maximum running slope of 1:10 or a curb ramp that meets the requirement of section 80.26 at changes in level of 75 mm or greater and 200 mm or less.
  - iv. It must have a ramp that meets the requirements of section 80.24 and changes in level of greater than 200 mm.
9. The entrance to the exterior path of travel must provide a minimum clear opening of 850 mm, whether the entrance includes a gate, bollard or other entrance design.

### *PIC Commitment*

Pembridge Insurance Company will work with its landlords to ensure the creation of new or the redevelopment of existing exterior paths meets the requirements.

### Status

Completed and ongoing.

## Section 80.24 Ramps

Where an exterior path of travel is equipped with a ramp, the ramp must meet the following requirements:

1. The ramp must have a minimum clear width of 900 mm.
2. The surface of the ramp must be firm and stable.
3. The surface of the ramp must be slip resistant.
4. The ramp must have a maximum running slope of no more than 1:15.
5. The ramp must be provided with landings that meet the following requirements:
  - i. Landings must be provided,
    - a) At the top and bottom of the ramp,
    - b) Where there is an abrupt change in direction of the ramp, and
    - c) At horizontal intervals not greater than nine metres apart.
  - ii. Landings must be a minimum of 1,670 mm by 1,670 mm at the top and bottom of the ramp and where there is an abrupt change in direction of the ramp.
  - iii. Landings must be a minimum of 1,670 mm in length and at least the same width of the ramp for an in-line ramp.
  - iv. Landings must have a cross slope that is not steeper than 1:50.
6. Where a ramp has openings in its surface,
  - i. the openings must not allow passage of an object that has a diameter of more than 20 mm, and
  - ii. any elongated openings must be oriented approximately perpendicular to the direction of travel.
7. A ramp must be equipped with handrails on both sides of the ramp and the handrails must,
  - i. be continuously graspable along their entire length and have circular cross-section with an outside diameter not less than 30 mm and not more than 40 mm, or any non-circular shape with a graspable portion that has a perimeter not less than 100 mm and not more than 155 mm and whose largest cross-sectional dimension is not more than 57 mm,
  - ii. be not less than 865 mm and not more than 965 mm high, measured vertically from the surface of the ramp, except that handrails not meeting these requirements are permitted provided they are installed in addition to the required handrail,
  - iii. terminate in a manner that will not obstruct pedestrian travel or create a hazard,
  - iv. extend horizontally not less than 300 mm beyond the top and bottom of the ramp,
  - v. be provided with a clearance of not less than 50 mm between the handrail and any wall to which it is attached, and
  - vi. be designed and constructed such that handrails and their supports will withstand the loading values obtained from the non-concurrent application of a concentrated load not less than 0.9 kN applied at any point and in any direction for all handrails and a uniform load not less than 0.7 kN/metre applied in any direction to the handrail.
8. Where the ramp is more than 2,200 mm in width,
  - i. one or more intermediate handrails which are continuous between landings shall be provided and located so that there is no more than 1,650 mm between handrails, and
  - ii. the handrails must meet the requirements set out in paragraph 7.

9. The ramp must have a wall or guard on both sides and where a guard is provided, it must,
  - i. be not less than 1,070 mm measured vertically to the top of the guard from the ramp surface, and
  - ii. be designed so that no member, attachment or opening located between 140 mm and 900 mm above the ramp surface being protected by the guard will facilitate climbing.
10. The ramp must have edge protection that is provided,
  - i. with a curb at least 50 mm high on any side of the ramp where no solid enclosure or solid guard is provided, or
  - ii. with railings or other barriers that extend to within 50 mm of the finished ramp surface.

### ***PIC Commitment***

Pembridge Insurance Company will work with its landlords to ensure ramps on exterior paths of travel meet the requirements.

### **Status**

Completed and ongoing

### **Section 80.25 Stairs**

Where stairs connect to exterior paths of travel, the stairs must meet the following requirements:

1. The surface of the treads must have a finish that is slip resistant.
2. Stairs must have uniform risers and runs in any one flight.
3. The rise between successive treads must be between 125 mm and 180 mm.
4. The run between successive steps must be between 280 mm and 355 mm.
5. Stairs must have closed risers.
6. The maximum nosing projection on a tread must be no more than 38 mm, with no abrupt undersides.
7. Stairs must have high tonal contrast markings that extend the full tread width of the leading edge of each step.
8. Stairs must be equipped with tactile walking surface indicators that are built in or applied to the walking surface, and the tactile walking surface indicators must,
  1. have raised tactile profiles,
  2. have a high tonal contrast with the adjacent surface,
  3. be located at the top of all flights of stairs, and
  4. extend the full tread width to a minimum depth of 610 mm commencing one tread depth from the edge of the stair.
9. Handrails must be included on both sides of stairs and must satisfy the requirements set out in paragraph 7 of subsection 80.24 (1).
10. A guard must be provided that is not less than 920 mm, measured vertically to the top of the guard from a line drawn through the outside edges of the stair nosings and 1,070 mm around the landings and is required on each side of a stairway where the difference in elevation between ground level and the top of the stair is more than 600 mm but, where there is a wall, a guard is not required on that side.
11. Where stairs are more than 2,200 mm in width,



- i. one or more intermediate handrails that are continuous between landings must be provided and located so there is no more than 1,650 mm between handrails, and
- ii. the handrails must satisfy the requirements set out in paragraph 7 of subsection 80.24 (1).

#### ***PIC Commitment***

Pembridge Insurance Company will work with its landlords to ensure stairs connected to exterior paths of travel are accessible per the requirements.

#### **Status**

Completed and ongoing.

#### **Section 80.26 Curb ramps**

Where a curb ramp is provided on an exterior path of travel, the curb ramp must align with the direction of travel and meet the following requirements:

1. The curb ramp must have a minimum clear width of 1,200 mm, exclusive of any flared sides.
2. The running slope of the curb ramp must,
  1. be a maximum of 1:8, where elevation is less than 75 mm, and
  2. be a maximum of 1:10, where elevation is 75 mm or greater and 200 mm or less.
3. The maximum cross slope of the curb ramp must be no more than 1:50.
4. The maximum slope on the flared side of the curb ramp must be no more than 1:10.
5. Where the curb ramp is provided at a pedestrian crossing, it must have tactile walking surface indicators that,
  - i. have raised tactile profiles,
  - ii. have a high tonal contrast with the adjacent surface,
  - iii. are located at the bottom of the curb ramp,
  - iv. are set back between 150 mm and 200 mm from the curb edge,
  - v. extend the full width of the curb ramp, and
  - vi. are a minimum of 610 mm in depth.

#### ***PIC Commitment***

Pembridge Insurance Company will work with its landlords to ensure curb ramps on exterior paths of travel are accessible per the requirements.

#### **Status**

Completed and ongoing

#### **Section 80.27 Depressed curbs**

Where a depressed curb is provided on an exterior path of travel, the depressed curb must meet the following requirements:

1. The depressed curb must have a maximum running slope of 1:20.
2. The depressed curb must be aligned with the direction of travel.

3. Where the depressed curb is provided at a pedestrian crossing, it must have tactile walking surface indicators that,
  - i. have raised tactile profiles,
  - ii. have high tonal contrast with the adjacent surface,
  - iii. are located at the bottom portion of the depressed curb that is flush with the roadway,
  - iv. are set back between 150 mm and 200 mm from the curb edge, and
  - v. are a minimum of 610 mm in depth.

#### ***PIC Commitment***

Pembridge Insurance Company will work with its landlords to ensure depressed curbs on exterior paths of travel are accessible per the requirements.

#### **Status**

Completed and ongoing .

#### **Section 80.28 and 80.29 Accessible pedestrian signals and Rest areas**

Where new pedestrian signals are being installed or existing pedestrian signals are being replaced at a pedestrian crossover, they must be accessible pedestrian signals.

When constructing new or redeveloping existing exterior paths of travel that they intend to maintain, obligated organizations, other than small organizations, shall consult on the design and placement of rest areas along the exterior path of travel.

#### ***PIC Commitment***

Not applicable to Pembridge Insurance Company. We will revisit every year when we review the accessibility plan.

#### **Section 80.32 Application, Off-Street Parking**

Obligated organizations shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain, the off-street parking facilities meet the requirements set out in this Part.

#### ***PIC Commitment***

Pembridge Insurance Company will work with its landlords to ensure the creation of new or the redevelopment of existing off-street parking facilities meets the requirements.

#### **Status**

Completed and ongoing

#### **Section 80.34 Types of accessible parking spaces**

Off-street parking facilities must provide the following two types of parking spaces for the use of persons with disabilities:

1. Type A, a wider parking space which has a minimum width of 3,400 mm and signage that identifies the space as “van accessible”.
2. Type B, a standard parking space which has a minimum width of 2,400 mm.

### ***PIC Commitment***

Pembridge Insurance Company will work with its landlords to ensure off-street parking facilities provide the appropriate number of Type A and Type B parking spaces and are correctly identified per the requirements.

#### **Status**

Completed and ongoing.

### **Section 80.35 Access aisles**

(1) Access aisles, that is, the space between parking spaces that allows persons with disabilities to get in and out of their vehicles, must be provided for all parking spaces for the use of persons with disabilities in off street parking facilities.

(2) Access aisles may be shared by two parking spaces for the use of persons with disabilities in an off-street parking facility and must meet the following requirements:

1. They must have a minimum width of 1,500 mm.
2. They must extend the full length of the parking space.
3. They must be marked with high tonal contrast diagonal lines, which discourages parking in them, where the surface is asphalt, concrete or some other hard surface.

### ***PIC Commitment***

Pembridge Insurance Company will work with its landlords to ensure off-street parking facilities provide the appropriate number and size of access aisles per the requirements.

#### **Status**

Completed and ongoing.

### **Section 80.36 Minimum number and type of accessible parking spaces**

Off-street parking facilities must have a minimum number of parking spaces for the use of persons with disabilities, in accordance with the following requirements:

1. One parking space for the use of persons with disabilities, which meets the requirements of a Type A parking space, where there are 12 parking spaces or fewer.
2. Four per cent of the total number of parking spaces for the use of persons with disabilities, where there are between 13 and 100 parking spaces in accordance with the following ratio, rounding up to the nearest whole number:
  - i. Where an even number of parking spaces for the use of persons with disabilities are provided in accordance with the requirements of this paragraph, an equal number of parking spaces that meet the requirements of a Type A parking space and a Type B parking space must be provided.
  - ii. Where an odd number of parking spaces for the use of persons with disabilities are provided in accordance with the requirements of this paragraph, the number of parking spaces must be divided equally between parking spaces that meet the requirements of a Type A parking space and a Type B parking space, but the additional parking space, the odd-numbered space, may be a Type B parking space.

3. One parking space for the use of persons with disabilities and an additional three per cent of parking spaces for the use of persons with disabilities, where there are between 101 and 200 parking spaces must be parking spaces for the use of persons with disabilities, calculated in accordance with ratios set out in subparagraphs 2 i and ii, rounding up to the nearest whole number.
4. Two parking spaces for the use of persons with disabilities and an additional two per cent of parking spaces for the use of persons with disabilities, where there are between 201 and 1,000 parking spaces must be parking spaces for the use of persons with disabilities in accordance with the ratio in subparagraphs 2 i and ii, rounding up to the nearest whole number.
5. Eleven parking spaces for the use of persons with disabilities and an additional one per cent of parking spaces for the use of persons with disabilities, where more than 1,000 parking spaces are provided must be parking spaces for the use of persons with disabilities in accordance with the ratio in subparagraphs 2 i and ii, rounding up to the nearest whole number.

(2) If an obligated organization provides more than one off-street parking facility at a site, the obligated organization shall calculate the number and type of parking spaces for the use of persons with disabilities according to the number and type of parking spaces required for each off-street parking facility.

(3) In determining the location of parking spaces for the use of persons with

disabilities that must be provided where there is more than one off-street parking facility at a site, an obligated organization may distribute them among the offstreet parking facilities in a manner that provides substantially equivalent or greater accessibility in terms of distance from an accessible entrance or user convenience.

(4) For the purposes of subsection (3), the following factors may be considered in determining user convenience:

1. Protection from the weather.
2. Security.
3. Lighting.
4. Comparative maintenance.

### ***PIC Commitment***

Pembridge Insurance Company will work with its landlords to ensure off-street parking facilities provide the appropriate minimum number of Type A and Type B parking spaces and that they will be located appropriately per the requirements.

### **Status**

Completed and ongoing.

### **Section 80.37 Signage**

Obligated organizations shall ensure that parking spaces for the use of persons with disabilities as required under section 80.36 are distinctly indicated by erecting an accessible permit parking sign in accordance with section 11 of Regulation 581 of the Revised Regulations of Ontario, 1990 (Accessible Parking for Persons with Disabilities) made under the Highway Traffic Act.

### ***PIC Commitment***

The Pembrige Insurance Company will work with its landlords to ensure off-street parking facilities are correctly signed and/or identified per the requirements.

### **Status**

Completed and ongoing.

### **Section 80.38 Exception**

(1) An exception to the required minimum number of parking spaces for the use of persons with disabilities is permitted where an obligated organization can demonstrate that it is not practicable to comply with the requirement because existing physical or site constraints prevent it from meeting the required ratio, such as where the minimum width for parking spaces for persons with disabilities or access aisles cannot be met because of existing pay and display parking meters, surrounding curb edges, walkways, landscaping or the need to maintain a minimum drive aisle width.

(2) Where an obligated organization claims an exception to the minimum number of parking spaces for the use of persons with disabilities, it shall provide as close to as many parking spaces for the use of persons with disabilities that meet the requirements of this Part, as would otherwise be required under subsection 80.36 (1) or (2), as the case may be, that can be accommodated by the existing site and

a) where that number is an even number, the number of parking spaces must be divided equally between parking spaces that meet the requirements of a Type A parking space and a Type B parking space; and

b) where that number is an odd number, the number of parking spaces must be divided equally between parking spaces that meet the requirements of a Type A parking space and a Type B parking space, but the additional parking space, the odd-numbered space, may be a Type B parking space.

### **Status**

Completed and ongoing.

### **Section 80.40 to 80.41 Service Counters**

(1) Obligated organizations shall meet the requirements set out in this Part in respect of the following:

1. All newly constructed service counters and fixed queuing guides.
2. All newly constructed or redeveloped waiting areas.

(2) For the purposes of this Part, requirements for obtaining services in respect of service counters, fixed queuing guides and waiting areas apply whether the services are obtained in buildings or out-of-doors.

80.41 (1) When constructing new service counters, which includes replacing existing service counters, the following requirements must be met:

1. There must be at a minimum one service counter that accommodates a mobility aid for each type of service provided and the accessible service counter must be clearly identified with signage, where there are multiple queuing lines and service counters.
2. Each service counter must accommodate a mobility aid, where a single queuing line serves a single or multiple counters.

(2) The service counter that accommodates mobility aids must meet the following requirements:

1. The countertop height must be such that it is usable by a person seated in a mobility aid.
2. There must be sufficient knee clearance for a person seated in a mobility aid, where a forward approach to the counter is required.
3. The floor space in front of the counter must be sufficiently clear so as to accommodate a mobility aid.

#### ***PIC Commitment***

Pembridge Insurance Company will ensure newly constructed or redeveloped service counters are accessible per the requirements.

#### **Status**

Completed and ongoing.

#### **Section 80.42 Fixed Queuing Guides**

When constructing new fixed queuing guides, the following requirements must be met:

1. The fixed queuing guides must provide sufficient width to allow for the passage of mobility aids and mobility assistive devices.
2. The fixed queuing guides must have sufficiently clear floor area to permit mobility aids to turn where queuing lines change direction.
3. The fixed queuing guides must be cane detectable.

#### ***PIC Commitment***

Pembridge Insurance Company will ensure new fixed queuing guides are accessible per the requirements.

#### **Status**

Completed and ongoing.

#### **Section 80.43 Waiting Areas**

(1) When constructing a new waiting area or redeveloping an existing waiting area, where the seating is fixed to the floor, a minimum of three per cent of the new seating must be accessible, but in no case shall there be fewer than one accessible seating space.

(2) For the purposes of this section, accessible seating is a space in the seating area where an individual using a mobility aid can wait.

### ***PIC Commitment***

Pembridge Insurance Company will ensure new or redeveloped waiting areas are accessible per the requirements.

#### **Status**

Completed and ongoing.

### **Section 80.44 Maintenance**

In addition to the accessibility plan requirements set out in section 4, obligated organizations, other than small organizations, shall ensure that their multi-year accessibility plans include the following:

1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part.
2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order.

### ***PIC Commitment***

Pembridge Insurance Company (PIC) will maintain the following procedures for preventative and emergency maintenance of the accessible elements in its public spaces:

1. PIC staff will perform regular monitoring and checks of accessible elements of PIC public spaces; and
2. PIC staff, upon identification of any issue impacting accessible elements in PIC's public spaces, will report any findings to building operations management as soon as reasonably possible for timely remediation and/or emergency maintenance, where necessary.

In addition, in the event of any temporary disruptions affecting the accessible elements in PIC public spaces, due to maintenance or otherwise, PIC will notify the public through the following procedure:

- a) In the event of a planned service disruption to facilities and services that are relied upon by people with disabilities to access PIC goods or services, including accessible elements of PIC public spaces that are not in working order, notice of the disruption shall be provided in advance.
- b) In the event of an unexpected disruption, notice will be provided as soon as possible.
- c) Notice will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities and services that may be available.
- d) Notice may be given by posting the information in a conspicuous place on the premises or at customer service counters located at PIC Head Office or regional sites, and/or posted on PIC websites or by such other method as is reasonable under the circumstances.

#### **Status**

Completed and ongoing.