



AODA Accessibility Policy

Accessibility for Ontarians with Disabilities Act, 2005

BCM Insurance Accessibility Policy

1. Background

BCM Insurance Company (BCM) is subject to legislation which has been enacted with the goal of developing standards that would improve accessibility for people with disabilities. Such legislation requires BCM to be in compliance with a number of customer service accessibility standards.

2. Purpose

This policy is intended to meet current legislative requirements and applies to the provision of goods and services to the public, not the goods themselves.

This policy aims to ensure that persons with disabilities are provided equal opportunity to obtain, use and benefit from BCM goods and services. Reasonable efforts will be made to ensure that:

- Goods and services are provided in a manner that respects the dignity and independence of persons with disabilities;
- The goods and services provided to persons with disabilities are integrated with the provision to others unless an alternate measure is necessary to allow a person with a disability to benefit from the goods and services. The alternate measure may be temporary or permanent;
- Communication with a person with a disability is conducted in a manner that takes into account their disability;
- People with disabilities may use assistive devices, service animals and support persons as is necessary to access BCM goods and services. If a service animal is excluded by law from a premise, other measures will be made available for the person with a disability to access the goods or services.

3. Scope

This policy governs the provision of services by BCM, as well as the provision of BCM services off the premises by BCM employees.

The part of the policy that deals with the use of service animals and support persons applies only to services provided by BCM at premises owned or operated by BCM.

4. Our mission

BCM is a company committed to excellence in serving all customers including people with disabilities.

5. Our commitment

In fulfilling our mission, BCM is committed to providing its services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.

6. Providing goods and services to people with disabilities

BCM 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:** We will communicate with people with disabilities in ways that take into account their disability. We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities.
- **Telephone services:** 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. We will offer to communicate with customers by e-mail, and other services which may become available if telephone communication is not suitable to their communication needs or is not available.
- **Assistive devices:** We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. We will ensure that our staff are trained and familiar with various assistive devices that may be used by individuals with disabilities while accessing our goods or services. We will ensure that our service employees are trained in the use of the various assistive devices provided by BCM, for individuals with disabilities while accessing our facilities or services.
- **Billing:** 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, and e-mail.

We will answer any questions customers may have about the content of the invoice in person, by telephone or e-mail.

7. 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 and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

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 BCM's 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 their support person while on our premises.

8. Notice of temporary disruption

BCM 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, the anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed at all public entrances and service counters on our premises.

9. Training for staff

BCM will ensure that all persons to whom this policy applies receive training as required by applicable legislation.

This training will be provided as soon as practicable following a new employee commencing employment with BCM.

Training will include the following:

- The purposes of applicable law, including 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
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to use the equipment or devices available at BCM that may help with the provision of services to persons with disabilities.
- What to do if a person with a disability is having difficulty in accessing BCM's services
- BCM's policies, practices and procedures relating to the customer service standard

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.

10. Feedback process

The ultimate goal of BCM is to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way BCM provides services to people with disabilities can be made by letter, e-mail, or verbally. All feedback will be directed to BCM Insurance's President/CEO. Customers can expect to hear back within 5 business days.

11. 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.

12. Questions about this policy

The purpose of this policy is to provide a framework through which BCM can achieve service excellence for people with disabilities. If anyone has questions about this policy, please contact:

Accessibility Coordinator

BCM Insurance Company

1003 Niagara Street

Welland, ON L3C 1M5

T. 905-735-1234 | F. 905-735-6519

E. accessibility@bcminsurance.com

Integrated Accessibility Standards Policy

The following policy has been established by BCM Insurance Company (BCM) to govern the provision of services with 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.

BCM 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.

Accessibility Plan

BCM 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. Upon request, BCM will provide a copy of the Accessibility Plan in an accessible format.

Training Employees and Volunteers

BCM 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 BCM'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 as soon as practicable. BCM will keep a record of the training it provides.

Commitment

BCM 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.

Information and Communications Standards

Feedback

BCM will continue to ensure that its process for receiving and responding to 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 Communications Supports

Upon request, BCM 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.

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

BCM will also notify the public about the availability of accessible formats and communication supports.

Accessible Websites and Web Content

BCM will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

Employment Standards

Recruitment

BCM 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

BCM 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, BCM 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, BCM will notify the successful applicant of its policies for accommodating employees with disabilities, upon request.

Informing Employees of Supports

BCM 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, BCM 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, BCM will consult with the employee making the request.

Workplace Emergency Response Information

BCM 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 BCM is aware of the need for accommodation due to the employee's disability. BCM will provide this information as soon as practicable after becoming aware of the need for accommodation.

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

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

Documented Individual Accommodation Plans

BCM 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

BCM 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 BCM 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

BCM 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 a policy is not understood, an explanation will be provided by:

Accessibility Coordinator

BCM Insurance Company

1003 Niagara Street

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BCM Insurance Multi-Year Accessibility Plan

As part of BCM Insurance's (BCM) commitment to accessibility, this multi-year Accessibility Plan has been developed outlining the company's strategy and the actions that have, and will be, implemented to prevent and remove barriers from its workplace, and to improve opportunities for persons with disabilities. This multi-year Accessibility Plan outlines the steps BCM is taking to meet its requirements under the Accessibility for Ontarians with Disabilities Act (AODA) and focuses on BCM's initiatives in respect of the AODA's Accessibility Standards in making Ontario an accessible province for all Ontarians.

Customer Service

BCM is committed to excellence in serving all customers including people with disabilities. BCM complied with the AODA's Customer Service Standard with the following initiatives that were implemented as of January 1, 2012, and are ongoing:

- An accessibility policy was put in place so BCM's employees and customers can know what to expect.
- BCM's staff and volunteers are trained to serve customers of all abilities.
- A written record of accessibility training provided by BCM is maintained.
- Service animals and support persons are welcomed on all BCM premises.
- Accessible ways for people to provide feedback on how BCM provides goods and services to people with disabilities was made available.

Information and Communications

BCM currently provides accessible formats and communication supports for persons with disabilities upon request. BCM provides notice to the public of this availability and consults with the person making such a request to determine the suitability of an accessible format or communication support.

As well, it is currently a global web development requirement that all new BCM web content be built to meet the World Wide Web Consortium Content Accessibility Guidelines (WCAG) 2.0 standard. BCM is committed to ensuring all BCM internet websites and web content conform with Level AA of the WCAG 2.0 by January 1, 2021 as required by the AODA's Information and Communications Standard.

Policies and Training

BCM has and will continue to implement policies and initiatives in accordance with the AODA by taking the following steps:

- Implementing policies outlining BCM's commitment to accessibility. (Implemented as of January 1, 2012)
- Providing training to BCM's employees and volunteers on accessibility and human rights legislation, as it pertains to people with disabilities. (Implemented as of January 1, 2012, and ongoing as new employees/volunteers join the company)

This plan will be reviewed once every five years.

Employment

In accordance with the AODA's Employment Standards, BCM implemented the following initiatives prior to January 1, 2016:

- Ensure BCM's employment processes for hiring, retention and career development are accessible.
- Document BCM's processes for developing individual accommodation plans and return-to-work plans.
- Provide individualized workplace emergency response information to employees who have a disability where BCM is aware of the need for accommodation.

Accessibility Plan Review

This multi-year Accessibility Plan will be reviewed and updated at least once every five (5) years.

Feedback

BCM strives to ensure it has accessible ways to receive and respond to feedback. BCM will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities and will respond to feedback promptly.

For more information on this Accessibility Plan, please contact:

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Upon request, a copy of this Accessibility Plan will be provided in an accessible format free of charge.