GREEN SHIELD CANADA’S
ACCESSIBILITY FOR PERSONS WITH DISABILITIES POLICY

BACKGROUND

In 2005 the Government of Ontario passed the Accessibility for Ontarians with Disabilities Act (AODA) to promote the full inclusion of persons with disabilities in society. The objective of this legislation, and the regulations and standards passed pursuant to it, is to create a barrier-free Ontario including public and private sector services and workplaces.

Green Shield Canada (GSC) supports the objectives of the AODA and is committed to enabling accessibility for persons with disabilities in relation to GSC’s products and services and in its workplaces across Canada.

PURPOSE AND SCOPE

The purpose of GSC’s policy is to:

- Promote and maintain an environment that enables the participation of persons with disabilities whether as clients, customers, business partners, or employees.
- Educate GSC employees about the importance of facilitating access for persons with disabilities and about the provisions of GSC’s policy.
- Ensure GSC is in compliance with applicable legislation, regulations, and standards in relation to persons with disabilities.

OUR COMMITMENT

GSC is committed to meeting the needs of our customers and employees who require accommodation. We are committed to ensuring the dignity and independence of persons with disabilities. Everyone, whether a person’s disability is apparent or not, will be treated with courtesy, made to feel welcome, and have their need for accommodation respected whenever they interact with GSC.

TERMS OF REFERENCE AND DEFINITIONS

The following definitions apply to this policy:

“Accessible” is defined as something that can be easily accessed or used by a person with a disability.
“Accommodation” is a means, through reasonable efforts, of preventing and removing barriers that impede individuals with disabilities from participating fully in services provided by GSC.

“Assistive device” is any device used by people with disabilities to help with their daily living such as wheelchairs, walkers, white canes, oxygen tanks, electronic communication devices, etc.

“Barriers to accessibility” means anything that prevents a person with a disability from fully participating. This includes, but is not limited to, a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, or a technological barrier.

“Customer” is any person who uses the products and services of GSC.

“Disability” as defined, means:
   a) Any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth defect, or illness;
   b) A condition of mental impairment or developmental disability;
   c) A learning disability or a dysfunction on 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 are being claimed or received.

“Employee” includes persons who are permanent employees of GSC, independent contractors, or directors.

“Service animal” is an animal that is being used because of a person’s disability. This is either readily apparent or is supported by a letter from a medical practitioner.

“Support person” accompanies a person with a disability to help them with communication, mobility, personal care, or medical needs or to access the services of GSC.

“Third-party contractors” is any person or organization acting on behalf of or as an agent of GSC.

**STATEMENT OF PRINCIPLES**

In dealing with all persons GSC and its employees will respect the following principles:

a) All persons dealing with GSC will be treated with dignity and respect. Service will be provided in a way that allows persons with a disability to maintain their self-respect.
The need for persons with disabilities to maintain their own independence will be respected by allowing the person with a disability to do things on their own without unnecessary help or interference from others.

b) Service will be provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or a similar way, as other customers, unless an alternative measure is necessary to enable the person to access goods or services.

c) People with disabilities will have an opportunity equal to that given to others to access GSC’s goods or services.

d) GSC will 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 a disability. GSC will provide updated information to 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.

EXPECTATIONS

1. GSC will make reasonable efforts to ensure that this policy and any practices and procedures arising from this policy are adhered to by its employees.

2. GSC will provide training for employees who directly provide customer service to, or who interact with, the public as a key element of their role. Training will also be provided to new staff members or those employees who commence new job duties that involve direct interaction with customers and the public.

Training will include a review of the purposes of the Act and the requirements of this Regulation and instruction about the following matters:
   a) How to interact and communicate with persons with various types of disability.
   b) How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
   c) How to use equipment or devices available on the provider’s premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability.
   d) What to do if a person with a particular type of disability is having difficulty accessing the provider’s goods or services.
Staff will receive training or updates when changes are made to GSC’s policy, practices, or procedures.

3. GSC will make reasonable efforts to communicate with persons with disabilities in ways that take into account their disability. Where it is possible and/or reasonable GSC will provide technology to support accessible and effective communications with persons with disabilities, including through its website and telephone services.

4. Upon request from an employee with a disability, GSC will consult with the employee to arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee’s job and for information that is generally available to employees in the workplace. GSC will consult with the employee making the request in determining the suitability of an accessible format or communication support.

5. GSC is committed to providing service to persons with disabilities who use assistive devices or who have a support person or a service animal.

6. When services that are normally provided to a person with a disability are temporarily unavailable notice of this disruption will be provided by the department(s) responsible.

7. Feedback about the effectiveness of GSC’s services to people with disabilities will be welcomed. Information on how feedback can be given will be posted on GSC’s website and will be provided upon request. Where feedback involves a complaint, efforts will be made to address the matter immediately; however, in all cases feedback and complaints will be responded to within 15 business days.

8. This policy will be available on the corporate website and will be made available in alternative formats upon request.