



Accessibility Policy

Facility Association (FA) is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

FA is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. FA understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

FA is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration, and equality of opportunity for people with disabilities.

Definitions

- Assistive Devices: auxiliary aids such as communication aids, personal mobility aids, and medical aids (e.g., canes, crutches, wheelchairs or hearing aids.)
- Disability: the same definition found in the Ontario Human Rights Code.
- Persons with Disabilities: individuals who have a disability as defined under the Human Rights Code.
- Service Animals: animals individually trained to do work or perform tasks for the benefit of a person with a disability.
- Support Persons: any persons, whether a paid professional, volunteer, family member, or friend, who accompany a person with a disability in order to help with communications, personal care, or medical needs or with access to goods and services.

Training

We are committed to training all staff in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities. In addition, we will train:

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

Training of our employees and volunteers on accessibility relates to their specific roles. Training includes:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards.
- our policies related to the Customer Service Standards.

- 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 on-site or otherwise that may help with providing goods, services, or facilities to people with disabilities.
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services, or facilities.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies. We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

Assistive Devices

People with disabilities may use their personal assistive devices when accessing our goods, services, or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, we will work with the individual concerned to identify other measures that may be used to ensure the person with a disability can access our goods, services, or facilities.

We ensure that our staff are trained and familiar with various assistive devices we have on site or that we provide that may be used by customers with disabilities while accessing our goods, services, or facilities. If applicable, identify how your organization will train staff on the use of assistive devices.

Communication

We communicate with people with disabilities in ways that take into account their disability. This may include the following:

- Email
- Telephone
- Teams/virtual meetings

We will work with the person with disabilities to determine what method of communication works for them.

Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties. When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter, or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability. A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

We will also ensure that all employees and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario

- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services, or facilities:

- explain why the animal is excluded.
- discuss with the customer another way of providing goods, services, or facilities.

Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, FA will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, 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.

Feedback Process

FA welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

All feedback, including complaints and the way FA provides goods and services to people with disabilities can be made by e-mail or phone. All feedback will be directed to the President & CEO by e-mail at mail@facilityassociation.com or by phone at 416-863-1750. Customers can expect to hear back in 30 days.

FA ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Notice of Availability of Documents

FA notifies the public that documents related to accessible customer service are available upon request by posting a notice on its website.

FA will provide these documents in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and at no additional cost.

Information and Communications

We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request. We communicate with people with disabilities in ways that take into account

their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) in a timely manner, taking 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.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

We notify the public about the availability of accessible formats and communication on our website.

Employment

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation. We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically 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

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will 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.
- c) When FA reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees. We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.

Changes to Existing Policies

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration, and equal opportunity for people with disabilities will be modified or removed. Accessible formats are available upon request.

FA's Multi-Year Accessibility Plan – 2025 to 2030

Facility Association (FA) has developed and will maintain a Multi-Year Accessibility Plan outlining its commitment and strategy to:

- Identify and eliminate barriers for persons with disabilities.
- Support accessibility standards and initiatives.
- Improve opportunities for persons with disabilities.

This Multi-Year Accessibility Plan is posted on the company's internal and external websites. The plan will be reviewed every five years and updated as FA meets the requirements of the plan. This plan includes both new and continuing priorities and commitments that will help FA achieve its goal of identifying, removing and preventing barriers to accessibility.

Message from the President & CEO

FA is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, are committed to meeting the needs of people with disabilities in a timely manner, and to removing and preventing barriers to accessibility.

We foster an inclusive workplace where all employees are treated with respect and dignity. FA will act in a manner consistent with its obligations under the Ontario Human Rights Code and the Accessibility for Ontarians with Disability Act (AODA) to provide employees with suitable work accommodations, whether temporary or permanent in nature.

Policies, procedures and processes have been put into practice and are based on best practice research and the general requirements of accessibility standards. They align with FA's principles of promoting an inclusive workplace where all employees are treated with respect and dignity. We remain committed to complying with our policies and will review them and this plan on an ongoing basis for any required changes so that we continue to promote accessibility within our organization.

Introduction

Facility Association is an unincorporated non-profit association of insurers. FA operates in Yukon, Nunavut, Northwest Territories, Alberta, Ontario, Nova Scotia, New Brunswick, Prince Edward Island and Newfoundland and Labrador. Every insurer licensed to write automobile liability insurance in these jurisdictions is a member of Facility Association. The affairs and business of FA is managed and controlled by a Board of Directors with authority Canada-wide. The President and CEO is responsible for the day-to-day operations of the organization and management of staff.

FA strives to meet the needs of its employees and members with disabilities and is continuously working to remove and prevent barriers to accessibility. We are committed to fulfilling our requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*. This accessibility plan outlines the steps we have taken and are taking to meet those requirements and to improve opportunities for people with disabilities. Our plan shows how we will play our role in making Ontario an accessible province for all Ontarians. The plan is reviewed and updated at least once every 5 years.

Section 1: Past Achievements to Remove and Prevent Barriers

Customer Service Standard

Facility Association is committed to providing accessible customer service to people with disabilities and remains in compliance with the Customer Service Standards. To this end, it has established policies, procedures, and practices for providing services to persons with disabilities that are consistent with the principles in the customer service standard. To date no complaints have been received from customers.

These policies, procedures and practices are reviewed annually.

Establishment of Policies, Practices and Procedures

- In July 2023 we reviewed and updated our Accessibility Policy, Employment Accommodation Policy, and Employment Accommodation Standards Policy.

Use of Service Animals and Support Persons

- FA's Accessibility Policy outlines its commitment to welcoming people with disabilities and their service animals and those who are accompanied by a support person.

Notice of Temporary Service Disruption

- In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, FA will notify customers promptly.
 - The notice will include information about the reason for the disruption, its anticipated length of time, 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.

Assistive Devices

- People with disabilities may use their personal assistive devices when accessing our goods, services, or facilities.
 - Staff have been trained and are familiar with various assistive devices that may be used by customers with disabilities while accessing our services or facilities.

Availability of Documents

- FA's statement of its commitment to accessibility and its policy are posted on our website at <https://www.facilityassociation.com/docs/Accessibility%20Policy%20July%202023.pdf>.
- FA's Accessibility Policy, Employment Accommodation Policy, and Employment Accommodation Standards Policy are posted on FA's internal website; all employees are required to read each policy and are available in an accessible format upon request.

Information and Communications Standard

FA is committed to making our information and communications accessible to people with disabilities and remains in compliance with the Information and Communications Standard. Policies, procedures and practices with respect to this standard are reviewed annually.

Accessible Formats and Communication Supports

- FA has implemented a process for receiving and responding to feedback that is accessible to persons with disabilities upon request.
- Employees have been informed of the ways in which they can communicate with people with

disabilities in ways that consider their disability.

Accessible Feedback Processes

- FA will ensure its feedback process is accessible to people with disabilities by providing or arranging accessible formats and communication supports, on request.
- Feedback regarding the way Facility Association provides services to people with disabilities can be made by e-mail or phone.
 - Feedback will be directed to the President & CEO by e-mail at mail@facilityassociation.com or by phone at 416-863-1750.
 - Complaints will be addressed by the President & CEO within 30 days of receipt.

Websites and Web Content

- FA has contracted with *Level Access*, a global leader in designing digital accessibility platform to make our public websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 – Level AA.

Employment Standard

Facility Association is committed to fair and accessible employment practices and remains in compliance with the Employment Standard.

Recruiting and Hiring

- We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring.
- Job applicants are notified when they are individually selected to participate in an assessment or selection process that accommodations are available upon request.
- A statement is included in all offers of employment informing new hires that FA has an accommodation process in place that provides accommodation for employees with disabilities.

Information and Communication Supports

- FA will ensure that any company-specific tools/equipment it provides for the employee to perform their current duties considers their disability.
- ADP's internet websites (FA's HRIS provider) and web content conform with WCAG 2.0 Level AA, except for exclusions set out in the IASR.

Individual Accommodation Plans

- In July 2023 FA published its updated Employment Accommodation policy and Employment Accommodation Standards Policy.

Performance Management and Career Development

- FA's performance management, career development and redeployment processes consider employees' accessibility needs.

Individualized Emergency Response Plans

- FA's Accessibility Policy outlines its commitment to provide customized emergency information to help an employee with a disability during an emergency.

Return to Work Process

- In 2023 FA updated its Short-Term Disability policy to address the accommodation needs of employees returning to work and outlined its Modified Work Arrangement process.

Training Standard

- FA's employees have completed required AODA training.
- Records of training are stored electronically.

Section 2: Strategies and Actions

Facility Association is committed to continuing to review its policies, practices, and processes to meet the requirements of the Accessibility for Ontarians with Disabilities Act and to remove and prevent barriers to people with disabilities.

Customer Service Standard

- Facility Association will continue to monitor, review, and update its established policies, procedures, and practices for providing services to persons with disabilities that are consistent with the principles in the customer service standard.

Information and Communications Standard

- FA continues to be committed to making its information and communications accessible to people with disabilities.

Employment Standard

- FA will ensure that any updates or changes made to its employment practices and/or systems consider the needs of people with disabilities.
- FA will review its emergency protocols to ensure the needs of people with disabilities are considered.

Training Standard

- FA will continue to require employees to complete AODA training annually.
 - New hires will complete AODA training as part of their new hire orientation process.
- FA will ensure that new Board members complete the required AODA training.

For More Information

If you would like to obtain this document in an alternate format or have any questions about FA's Multi-Year Accessibility Plan, please contact us at mail@facilityassociation.com or by phone at 416-863-1750.