



FCA Insurance Brokers

Accessibility for Ontarians with Disabilities Act

Customer Service Standard

Policies and Procedures

January 1, 2012

FCA Policy and Procedures

Introduction

Building on a fundamental commitment to exemplary customer service, FCA Insurance Brokers continues to work with customers, staff, and the community to identify, prevent and remove barriers to participation to ensure compliance with Ontario's Customer Service Standard.

THE AODA legislation has added to values already entrenched at FCA, where we welcome the opportunity to find new ways to improve on the service we provide to all our customers.

Definition of Disability

“Disability” means,

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in 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 were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*; (“handicap”).

Ontario Human Rights Commission/Accessibility for Ontarians with Disabilities Act, 2005.

The Accessibility for Ontarians with Disabilities Act

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) became law on June 13, 2005. Under this landmark legislation, the government of Ontario is developing mandatory accessibility standards that identify, remove and prevent barriers for people with disabilities in

key areas of daily living. The standards apply to private and public sector organizations across Ontario. The goal is for the province to be accessible by 2025.

The five key areas of focus are: Customer Service; Information and Communication; Employment; Transportation ; and the Built Environment.

The Customer Service Standard is the first standard developed to become a regulation and came into force on January 1, 2008. Compliance is required by January 1, 2012. The standard addresses business practices to provide better customer service to people with disabilities.

Information and Communication, Employment and Transportation have been combined into one Integrated Standard, which was enacted in July, 2011 for future implementation. The Built Environment public comments are being integrated into the Ontario Building Code, so only one piece of legislation will provide the standard.

The Customer Service Standard (AODA)

Every business and organization operating in Ontario that provides goods and services to the public or other organizations and has at least one employee in Ontario has **to comply by January 1st, 2012**. To meet the requirements of the Customer Service Standard, organizations must:

1. Establish policies and procedures on providing goods or services to customers with disabilities.
2. Provide training on how to serve customers with disabilities to staff, volunteers, contractors, and anyone else who interacts with the public or other third parties on your behalf, and those involved in developing customer service policies, practices and procedures.
3. Establish a process for receiving feedback on how you provide service to customers with disabilities and how you will respond to feedback and take action on any complaints. Make information about the feedback process readily available to the public.
4. Communicate with a customer with a disability in a manner that takes into account his or her disability.
5. Let customers with disabilities bring their service animals onto any part of your premises open to the public, except where the animal is otherwise excluded by law.
6. Let customers with disabilities bring their support person with them when accessing goods or services on parts of your premises open to the public.
7. Let the public know when facilities or services that people with disabilities usually use to access your goods or services are temporarily unavailable.
8. Document all policies, practices and procedures to providing accessible customer service and notify the public that these documents are available upon request.

Effective January, 2012, organizations with 20 or more employees will have to begin to file online accessibility reports annually with the Government of Ontario, regarding their compliance with the standard.

Economic Impact of Accessibility

As “disability” can mean so many different things, it is clear that disability impacts the lives of many Ontarians and the numbers of people with disabilities is increasing.

- In 20 years, one in five Ontarians are likely to have some kind of disability compared with approximately one in seven today.
- 10 – 20% of the general population have hearing loss; 50% of people over 65 have hearing loss.
- 600,000 Canadians have self identified as having vision loss.
- 6% of people with physical disabilities use a wheelchair.
- 70% of disabilities are hidden and often forgotten.
- Many of our veterans have disabilities. Men and women, who want to carry on their life activities with friends and family, will demand access to do so.
- It is projected that the older population will double in the next 25 years.

The disability sector is a growing market. Research indicates accessible service attracts more customers with disabilities, resulting in return visits and increased revenue.

- Persons with disabilities spend an estimated 25 billion a year in consumer spending. An individual with a disability impacts the spending decision of another 12 to 15 Canadians. (Source: Royal Bank, 2000).
- In Canada, Europe and the US, 75% of people with disabilities are physically and financially able to travel. People are living longer and have increased travel income to spend, creating increased tourism opportunities.
- Many communities are adopting age friendly principles focusing on access, to address the needs of the older population.
- A new report, “Releasing Constraints – Projecting the Economic Impacts of Increased Accessibility in Ontario”, commissioned by the Province of Ontario, has shown that achieving substantially higher levels of accessibility produces positive economic impacts for individuals, markets and social units. (Report prepared by the Martin Prosperity Group, the Adaptive Technology Resource Centre and the Institute for Competiveness and Prosperity)..

Accessible Customer Service at FCA Insurance Brokers

FCA Insurance Brokers has had a long standing commitment to continuous improvement in all aspects of customer service, including accessibility for customers with disabilities. The AODA Customer Service Standard requirements to meet the needs of persons with disabilities with clearly defined policies and procedures by January 1, 2012 complement FCA's already-established practices..

To ensure compliance with the Customer Service Standard, FCA Insurance Brokers has:

- *Reviewed existing policies and procedures;*
- *Revised and developed new policies and procedures, as required;*
- *Recommended long term priorities that continue to enhance the experience for customers with disabilities*
- *Committed resources for comprehensive staff training;*
- *Developed and implemented a communication plan to increase understanding of the Customer Service Standard.*

Customer Service Standard – FCA Insurance Brokers Policies and Procedures

In preparing for the compliance requirements, FCA Insurance Brokers has made reasonable efforts to ensure that its policies and procedures are consistent with the following principles, as defined by the Customer Service Standard, AODA:

- All goods and services at FCA Insurance Brokers will be provided in a manner that respects the dignity, independence, integration and equal opportunity of people with disabilities.
 - **Dignity**: service is provided in a way that allows the person with a disability to maintain self-respect and the respect of other people.
 - **Independence**: when a person with a disability is allowed to do things on their own, without unnecessary help or interference from others.
 - **Integration and Equal Opportunity**: service is 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 similar way as other customers, unless an alternate measure is necessary to enable a person with disability to access goods or services. They should not have to make significantly more effort to access or obtain service. They should also not have to accept inconvenience or lesser

quality. Sometimes this may mean that FCA Insurance Brokers has to treat individuals slightly differently so that they can benefit fully from the services.

Assistive Devices

Policy:

FCA Insurance Brokers is committed to serving people with disabilities, and ensuring that those who use assistive devices will benefit from enjoying a fulfilling experience.

Procedures:

We ensure that our employees and volunteers are familiar with the various assistive devices that may be used by customers with disabilities while accessing our services. Assistive devices are devices that are used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations, such as:

- Wheelchairs
- Hearing assistive receivers and mobile devices;
- Close captioning systems;
- Live descriptive services.

Note: Staff are cautioned that unless they are personally trained in the safety and use of wheelchairs, that they should not attempt to assist customers in getting into or out of wheelchairs.

Communicating with a Customer with a Disability

Policy:

FCA Insurance Brokers' policies and procedures take a person's disability into account when communicating with the individual. Two-way communications is a process of providing, sending, receiving and understanding information. To communicate in an effective way, we consider how the disability affects the way that the person expresses, receives or processes communications. Where possible, FCA staff asks the customer directly the best way to communicate with him/her.

Procedures:

FCA Insurance Brokers uses a variety of ways, to make communications more accessible wherever possible, by such means as:

- Considering the needs of people with disabilities during the planning stage of services and communication development.
- Using plain language to make a document easier to read for people with certain learning disabilities.
- Offering information in alternate formats and flexibility in means of communication:
 - Hand-write or type information back and forth;
 - Printed hand-outs of commonly used information;
 - Large print programs;
 - E-mail as an alternate channel to provide accessible communication.

Service Animals

Policy:

FCA Insurance Brokers is committed to welcoming customers with disabilities who are accompanied by a trained, accredited service animal. A service animal may accompany a customer or any third party with a disability to all parts of our premises that are open to the public. Service animals may be used for, but not limited to, the following disabilities: vision loss, physical disability, hearing loss, autism, epilepsy etc. Although service animals are most commonly dogs, other service animals could include, but are not limited to, ferrets, monkeys etc. FCA Insurance Brokers ensures that all employees, volunteers and others dealing with the public are properly trained in how to interact with people with disabilities, who are accompanied by a service animal.

Procedures:

To be considered a service animal under this standard, it must either be readily apparent that the animal is being used because of a person's disability or the person with a disability may be asked to provide a letter from a physician or nurse confirming that it is required because of his or her disability. Service animals are not pets - they are working animals. They are used by people with disabilities to overcome barriers much like assistive devices such as a white cane or a wheelchair.

Guide dogs or other service animals, including service animals in training, are allowed to accompany people with disabilities on FCA Insurance Brokers premises open to the public.

If the service animal is causing a disturbance for other customers, the customer and accompanying service dog may be required to leave the area or FCA premises.

The owner is responsible to "stoop and scoop".

FCA Insurance Brokers anticipates there will be special situations and is prepared to make every effort to accommodate the circumstances on an individual basis, as they arise, keeping safety to all customers and service animals in mind.

Customers can contact Customer Service for more information.

Support Persons

Policy:

FCA Insurance Brokers is 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 is allowed to enter FCA 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 his or her support person while on our premises.

A support person is an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services.

Procedures:

Customers are informed of this through FCA Insurance Brokers communication to the public.

Temporary Disruption of Service

Policy:

FCA Insurance Brokers is aware that temporary disruptions of services (daily functions – elevators, physical operations) and programs may occur due to reasons that may or may not be within FCA's control or knowledge. FCA Insurance Brokers makes a reasonable effort to provide advance notice of the disruption to the public, including information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that may be available.

Procedures:

Notice will be provided as appropriate to the situation, through any or all of the following means:

- Web site
- Telephone recordings;
- Internal email for staff and volunteers;
- Temporary signage..

In the event of an unexpected disruption, advance notice is not possible. In such cases, FCA Insurance Brokers provides notice, as soon as possible, through its communication networks.

Process to Receive and Respond to Feedback

Policy:

FCA Insurance Brokers has a process in place for receiving and responding to feedback about how goods and services are provided to customers with disabilities.

Procedures:

Customers with disabilities can offer their feedback in the following ways:

- In person at any of the FCA Insurance Brokers locations, with referral to the appropriate responding staff or management member
- On-line at www.fcainsurance.com web site;
- E-mail and telephone, (re-directed, as required, to the appropriate responding staff or management member);
- In writing where correspondence is re-directed to the appropriate responding staff or management member

The customer is requested to provide their name and contact information (phone, e-mail). Once feedback is received, the following actions are taken to respond:

- The feedback is directed to the appropriate person for action.
- The feedback is assessed for appropriate action. (Note: the customer service standard does not require a response to be provided for all feedback).
- Customers who provide feedback can expect an answer within 48 hours (two business days).

The feedback process is readily available to the public through:

- A notice on the web site;
- A sign in reception;
- A document describing the feedback process, available on request in different formats;
- Other communication networks, as appropriate.

The notice includes the following:

Dear Valued Customer,

We strive to improve accessibility for our customers with disabilities. We welcome your feedback. Please call _____ or e-mail _____ to share your comments, or request a copy of our accessibility policy.

*Thank you,
FCA Insurance Brokerst*

Customer Service Training

Policy:

FCA Insurance Brokers provides training to all employees and volunteers and all those who are involved in the development and approvals of customer service policies and procedures on providing goods and services to customers with disabilities. FCA ensures that third party and others, who deal with the public, have the required AODA training.

Procedures:

- All FCA staff and management are trained.

A variety of methods and time frames are used, and is also provided as part of FCA's general training program which includes information on basic orientation, training on effective communication and general customer service.

The training content, required by the Customer Service Standard, includes the following:

- The history of the legislation and the purposes of 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 assistive devices that may be available to help with the provision of goods or services to people with disabilities.
- What to do if a person with a disability is having difficulty in accessing FCA Insurance Brokers' services.
- FCA Insurance Brokers' policies and procedures relating to the customer service standard.

- On-going training in connection with any changes to FCA's policies and procedures governing the provision of goods and services to people with disabilities is provided.

Training to be provided within the context of:

- *FCA Insurance Brokers' commitment to exceptional service for all customers, including those with disabilities.*
- *Existing customer service policies and procedures.*
- *The assistance staff and volunteers cannot offer due to safety implications.*
- *Definitions of disability, and the key principles of dignity, independence, integration and equal opportunity.*
- *Customer scenarios, specific to FCA customers' experience.*
- *An open invitation to all staff to share innovative ideas to enhance the customer experience.*

Initial training is to be completed by December 31st, 2011 to meet the January 1st, 2012 deadline.

Training is recorded for staff and volunteers and includes name, date and content.

After January, 2012, new staff will also receive training. This training will be provided as soon as practicable or as soon as it can be done in the circumstances, after an employee commences their duties.

Posting of Documents

Policy:

Notices are posted, informing the public that the documents required by the Customer Service Standard are available upon request and will be provided in a format that takes a person's disability into account.

Procedures:

Documents are available through the following media, as appropriate.

- FCAInsurance.com Website
- Verbal report;
- Internal network
- Printed publications;
- Signage;