



Kent & Essex Mutual Insurance

**Accessibility for Ontarians with Disabilities
(AODA)**

Multi-Year Accessibility Plan

2021 - 2026

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Statement of Commitment

Kent & Essex Mutual 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 whether the person is a policyholder, customer, broker, board director or an employee. Hereinafter we will refer to all individuals as customers unless specified to be different in that section.

Kent & Essex Mutual shall use reasonable efforts to ensure that its policies, practices, and procedures are consistent with the following principles:

- All services will be provided in a manner that respects the dignity and independence of persons with disabilities.
- Persons with disabilities will be given an opportunity equal to that given to others to obtain, use, and benefit from the services we provide.
- Employees will communicate with customers in a manner that takes into account the person's disability.

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 by meeting our accessibility requirements under Ontario's accessibility laws.

Kent & Essex Mutual Multi-Year Accessibility Plan

General Requirements

Please Note: Kent & Essex breached the 50+ employee base on January 4, 2021, therefore the multi-year plan and several other requirements were only applicable to our organization as of that date.

Reviews:

This plan was reviewed in 2021 and will continue to be reviewed once every five years and revised as needed.

Availability:

This plan will be made available on the website and in accessible formats upon request. The plan below is a list of tasks to be undertaken to ensure accessibility for employees and customers of Kent & Essex Mutual Insurance Company.

Commitment:

Kent & Essex Mutual (Kent & Essex) provides training for all employees on the Integrated Accessibility Standard Requirements (IASR) and on the Ontario Human Rights Code as it relates to people with disabilities as soon as practicable upon hire (within 30 days maximum) as a part of Kent & Essex's Orientation Program. Employees will also be trained on an ongoing basis when changes are made to these policies, practices and procedures. This plan will be reviewed at minimum every five years to ensure that our organization meets the requirements to be fully accessible by 2025. This accessibility plan outlines the actions that Kent & Essex will take to improve opportunities for people with disabilities.

Action Taken:

The following accessibility measures have been implemented by Kent & Essex:

- Records have been tracked and filed for all AODA related training outlining the dates that the training was provided.

Required legislative compliance: January 1, 2021

Status: Completed

Customer Service Standard

Commitment:

Kent & Essex is committed to excellence in serving customers in a way that respects the dignity and independence of individuals with disabilities.

Action Taken:

The following accessibility measures have been implemented by Kent & Essex:

- Training is provided on the Human Rights Code as it pertains to persons with disabilities to all employees, independent contractors or volunteers/students and persons participating in the development and approval of Kent & Essex's policies.
- Track and maintain a record of the training provided, including the dates and that the training was provided.
- Ensuring that training is provided on any changes to Kent & Essex's policies on an ongoing basis.
- 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, unless the service animal is otherwise excluded from the area by law (kitchen areas) or where there are overriding health and safety considerations. If the support person is assisting the person with a disability to participate in an event or program on his or her own behalf, the support person is not charged a fee to attend the event or program.
- In the event of a planned or unexpected disruption in services at our premises, Kent & Essex will notify customers promptly. The notice will include information about the reason for the disruption and its anticipated length of time by placing such notices at all public entrances on the Kent & Essex premises. If the disruption is long-term, Kent & Essex will post an announcement on our website.

Kent & Essex's contact info to provide Customer Feedback is available online on the Kent & Essex public website. We welcome comments to help us monitor and improve our services.

Required legislative compliance: January 1, 2012

Status: Completed

Information and Communication Standard

Commitment:

Kent & Essex is committed to meeting the communication needs of people with disabilities. When requested, we will consult with people with disabilities to determine their information and communication needs. Kent & Essex will ensure that existing feedback processes are accessible to people with disabilities, upon request. Kent & Essex ensures that all our publicly available information is made accessible upon request. Where a request for an accessible format or for communication supports is received, Kent & Essex will:

- consult with the individual making the request to determine their accessibility needs and what would be a suitable format or support
- provide the requested information in a timely manner; and
- provide the information at regular cost (if any).

Accessible Emergency Procedures and Plans

Commitment:

Kent & Essex is committed to providing its employees, customers and visitors with emergency information in an accessible way upon request. We provide employees with disabilities with individualized emergency response information when necessary based on their known accommodation needs.

Required legislative compliance: January 1, 2012

Status: Completed

Accessible Websites and Web Content

Commitment:

In accordance with the ISAR, Kent & Essex will ensure that its public website and online content conform to the WorldWide Web

Consortium Web Content Accessibility Guidelines.

Kent & Essex will:

- Ensure that all new website and new web content comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A and Level AA
- Conduct an assessment of the company's website and testing for accessibility
- Establish a course of action and timelines to achieve web accessibility, based on the results of the assessment and compliance with the law.

Required legislative compliance: January 1, 2021

Status: In progress for completion June 2021

Feedback Processes

Commitment:

Customers will have an opportunity to provide feedback on how Kent & Essex provides products and services to people with disabilities. Feedback forms, along with alternative methods of providing feedback, such as verbally (in person or by telephone), or written (handwritten or email), will be made available upon request.

Required legislative compliance: January 1, 2015

Status: Completed

Accessible Formats and Communication Supports

Commitment:

Kent & Essex will provide information and communicate in an accessible manner about our products, services or facilities to individuals with disabilities, on request.

Kent & Essex will ensure that feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports upon request. Except as otherwise provided for under the IASR, Kent & Essex will provide or arrange for the provision of accessible formats and communication supports upon request for persons with disabilities that takes into account the person's accessibility needs. Kent & Essex will consult with the person making the request in determining the suitability of an accessible format or communication support.

Required legislative compliance: January 1, 2015

Status: Completed

Employment Standard

Commitment:

Kent & Essex is committed to inclusive and accessible employment practices that attract and retain talented employees with disabilities.

Action Taken:

Evaluation and Review of Barriers

- Review existing recruitment and employment practices and identify potential barriers to employment, including without limitation:
 - Methodology for advising of potential job opportunities
 - Identification of barriers that may arise during the interview process.

Recruitment, Assessment or Selection Process

- Inform job applicants who are selected for assessments or interviews during the recruitment process, that accommodations are available upon request in relation to materials or processes to be used.
- Consult with applicants requesting accommodation in order to provide suitable accommodation that takes into account the applicant's accessibility needs.
- Create systems to reduce or eliminate biases in recruitment processes (selection criteria, interview methodology).

Notice to Successful Applicants

- Notify successful applicants of policies for accommodating employees with disabilities when offering employment; this notice will be included in the letter of offer to the successful applicant.

Informing Employees of Supports

- Inform all employees of policies for supporting employees with disabilities, including providing employment-related accommodations.
- Provide new employees with this information during the orientation process.
- Provide all employees with updated information whenever there is a change to existing policies on the provision of job accommodations.
- Inform employees that their privacy will be respected and that any sharing of information about their accommodation needs will be discussed with them and plans for communication made with their consent.
- Ensure that any updates to the accommodation policy are circulated to all employees through orientation, training, at staff meetings and/or in writing via email.

Required legislative compliance: January 1, 2016

Status: Completed. Policies are provided to new employees for review and sign off, as well as the Code of Conduct annually by all employees.

Documented Individual Accommodation Plans and Return to Work Process

Commitment:

Kent & Essex will take the following steps to develop and put in place a process to ensure that barriers in accommodation and return to work processes are eliminated and policies surrounding these items are followed, where applicable.

Documented Individual Accommodation Plans

Prepare written accommodation plans for employees with disabilities indicating:

- How an employee requesting accommodation can participate in the development of their individual accommodation plan.
- How the employee will be assessed on an individual basis.
- How Kent & Essex can request an evaluation by an outside medical or other expert, at the employer's expense, to assist in determining if and how accommodation can be achieved.
- How the employee can request the participation of a representative from the workplace in the development of the accommodation plan.
- The steps taken to protect the privacy of the employee's personal information.
- The frequency and manner in which the individual accommodation plan will be reviewed and updated.
- If an individual accommodation plan is denied, how the reasons for the denial will be provided to the employee.
- How the individual accommodation plans will be documented taking into account the employee's accessibility needs due to disability.
- Confirm to employee's that:
 - All accommodation plans are private.
 - Each plan will include information on accessible formats and communications supports required, individual emergency response requirements and any other accommodation needed.
- Train employees on the duty to accommodate, the accommodation process, how to support the accommodation process and how to access information and assistance.

Return to Work

- Put in place a return-to-work policy to ensure that managers understand the accommodations being made as well as the privacy/communication concerns and agreements around the return-to-work accessibility requirements.

Required legislative compliance: January 1, 2016

Status: Completed

Performance Management, Career Development and Redeployment

Commitment:

Performance Management

- Take into account the accessibility needs of employees with disabilities regarding performance management, including performance plans in accessible formats.

Career Development and Advancement

- Take into account the accessibility needs of employees with disabilities regarding career development and advancement, including coaching and feedback.

Redeployment

- Take into account the accessibility needs and individual accommodation plans of employees with disabilities when they are reassigned to other departments or jobs within Kent & Essex.

Required legislative compliance: January 1, 2016

Status: Completed

Built Environment Standard

The Accessibility Standards for the Built Environment focuses on removing barriers in buildings and public spaces. Ontario's Building Code has been amended to include enhancements to accessibility in buildings. As of January 1, 2025, new construction and renovations will be subject to updated accessibility requirements which have been incorporated into Ontario's Building Code. The Design of Public Spaces Standard was added to the IASR and includes requirements for accessible parking, outdoor public eating areas, as well as service counters and waiting areas in locations where services are provided. This standard applies only to new construction and the extensive renovations of existing elements. Currently, Kent & Essex does not have any plans for new construction or extensive renovations.

In the meantime, Kent & Essex will address accessibility issues that may fall within the Built Environment Standard on an as needed basis and will ensure that any applicable requirements set out in the standard are followed.