

# Privacy: Integrated Accessibility Standards (Ontario)

LAST REVIEWED: FEBRUARY 2, 2021

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## SCOPE

This policy governs The Dominion of Canada General Insurance Company, Travelers Insurance Company of Canada and St. Paul Fire and Marine Insurance Company (collectively “Travelers Canada” or the “company”). It sets out how Travelers Canada is achieving (or will achieve, as is applicable to future obligations) its obligations in respect of ensuring accessibility for Ontarians with disabilities, as set out in *Ontario Regulation 191/11: Integrated Accessibility Standards* (“IAS”) under the *Accessibility for Ontarians with Disabilities Act, 2005 (Ontario)* (“Act”).

## CUSTOMER SERVICE POLICY

This policy is in addition to the company’s Accessibility Standards for Customer Service Policy, made pursuant to *Ontario Regulation 429/07: Accessibility Standards for Customer Service* under the Act, and does not supersede that policy.

## COMMITMENT

Travelers Canada is committed to treating all people in a way that allows them to maintain their dignity and independence. Travelers Canada believes in integration and equal opportunity and is committed to meeting the needs of individuals with disabilities in a timely manner.

## IMPLEMENTATION

This policy will be implemented in accordance with the timeframes established by the IAS.

## ACCESSIBILITY PLAN

Travelers Canada has established and implemented, and will maintain, an Accessibility Plan. The Accessibility Plan outlines the company’s strategy to prevent and remove accessibility barriers from its workplace and to ensure compliance with its obligations under the IAS. The Accessibility Plan will be reviewed and updated at least once every five years. Further, the Accessibility Plan (together with this policy) will be posted on the Travelers Canada’s website(s). Upon request, Travelers Canada will, as soon as is practicable, provide the Accessibility Plan (and / or this policy, whichever is requested), in an accessible format, to a requesting individual with a disability.

## TRAINING

Travelers Canada will ensure that training is provided, as required, in respect of the accessibility requirements set out under the IAS and will continue to provide training in respect of the requirements set out under the *Human Rights Code (Ontario)*, as they pertain to persons with disabilities. Such training will be provided to, and will be appropriate to the duties of, the following:

- all employees and volunteers;
- all persons who participate in developing Travelers Canada’s policies; and
- all other persons who provide goods, services or facilities on behalf of Travelers Canada.

Training will also be provided in the event that there are any changes to this policy. Training will be conducted as soon as is practical. For example, it is contemplated that new employees will be trained as part of their Onboarding process, which typically occurs within the first few weeks on the job. Travelers Canada will keep a record of the training it provides, including the dates on which the training is provided and the number of individuals to whom the training is provided.

## DILIGENCE

In delivering and performing the accessibility services contemplated under the IAS below which are to be tailored or provided to a specific individual, Travelers Canada shall in all cases act as soon as is practical (unless otherwise specifically stated below).

## INFORMATION AND COMMUNICATIONS STANDARDS



## **Feedback, Accessible Formats and Communication Supports**

Travelers Canada will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities. Travelers Canada will also, in a timely manner, provide or arrange for the provision of, accessible formats and communications supports to individuals with disabilities, upon request. In doing so, Travelers Canada will take into account, through consultation with the individual, the individual's accessibility needs and the suitability of the format or communication support to his or her disability.

## **Accessible Websites and Web Content**

Travelers Canada will ensure that the company's internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 in accordance with the timelines and requirements of the IAS.

## **EMPLOYMENT STANDARDS**

### **Recruitment, Assessment and Selection**

Travelers Canada accommodates applicants with disabilities in its recruitment process. Travelers Canada will notify job applicants, when individually selected to participate in an assessment or selection process, that accommodations in relation to the materials or processes to be used are available upon request. If a selected applicant requests an accommodation, Travelers Canada 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 his or her disability.

### **Notice to Successful Applicants**

When making offers of employment, Travelers Canada will notify the successful applicant of its policies for accommodating employees with disabilities.

### **Informing Employees of Supports**

Travelers Canada will continue to inform its employees of its policies and of any change to its policies, which are used to support employees with disabilities, including policies on the provision of job accommodations that take into account accessibility needs. This information will be provided to new employees as soon as is practicable after commencing employment.

### **Accessible Formats and Communication Supports for Employees**

Upon the request of an employee with a disability, Travelers Canada will consult with the employee in order to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform the employee's job and for information that is generally available to other employees. Travelers Canada will also consult with the employee making the request in determining the suitability of an accessible format or communication support.

### **Workplace Emergency Response Information**

As soon as is practicable after Travelers Canada becomes aware of the need for accommodation due to an employee's disability, Travelers Canada will provide individualized workplace emergency response information to the employee, provided that the disability is such that the individualized information is necessary. Further, if such employee requires assistance then, subject to the employee's consent, Travelers Canada will provide the workplace emergency response information to the person designated by Travelers Canada to provide assistance to the employee. Travelers Canada will review the individualized workplace emergency response information when such employee moves to a different location in Travelers Canada, when the employee's overall accommodation needs or plans are reviewed and when Travelers Canada reviews its general emergency response policies.

### **Documented Individual Accommodation Plans**

Travelers Canada will maintain a written process for the development of documented individual accommodation plans for employees with disabilities, which will include the content specified in the IAS. Travelers Canada will, in individual accommodation plans, identify any other accommodation that is to be provided, include any information regarding accessible formats and communication supports provided (if requested) and include individualized workplace emergency response information (if required).



## **Return to Work Process**

Travelers Canada maintains a documented return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. The return to work process outlines the steps Travelers Canada will take to facilitate the employee's return to work and will utilize documented individual accommodation plans as part of the process.

## **Performance Management, Career Development, Advancement and Redeployment**

Travelers Canada will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting employee performance management, providing career development and advancement to employees and redeploying employees.

## **BUILT STANDARDS**

### **Exterior Paths of Travel**

Travelers Canada will ensure that any exterior paths of travel that it constructs or redevelops meet the requirements as contemplated in the IAS.

### **Service Counters and Waiting Areas**

Travelers Canada will ensure that any newly constructed service counters or waiting areas and any redeveloped waiting areas meet the requirements as contemplated in the IAS.

### **Maintenance**

Travelers Canada will conduct preventative and emergency maintenance of any accessible parts of the above-mentioned exterior paths of travel, service counters and waiting areas and will also remediate temporary disruptions where the accessible parts of the above-mentioned exterior paths of travel, service counters and waiting areas are not in working order, as contemplated in the IAS.

## **QUESTIONS AND COMMENTS**

For all questions and comments in relation to this policy, please contact a representative from the Accessibility Office. The contact information is as follows:

Accessibility Office  
Travelers Canada  
165 University Avenue  
Toronto, Ontario M5H 3B9

Tel: 416.362.7231  
Toll Free Tel: 1.800.268.8447  
Email: [AccessibilityOffice@travelers.com](mailto:AccessibilityOffice@travelers.com)