



Accessibility for Ontarians with Disability Act

The EDGE Integrated Accessibility and

Customer Service Policy

Customer Service Standard

The Edge Benefits Inc. (herein after referred to as The EDGE) is committed to excellence in serving all customers, including people with disabilities.

The Accessibility for Ontarians with Disabilities Act, 2005 is Provincial legislation that sets out Standards of compliance to ensure that services provided to Ontarians with disabilities is accessible and provided in a manner that uses reasonable efforts consistent with the core principles of:

Dignity – services are provided in a respectful manner

Independence – services support their independence

Respect – respect their right to safety and personal privacy

Integration/Inclusion – services allow all to benefit from the same service in the same way as other clients

Accommodation – provide an opportunity to benefit from our service the same as other clients.

The EDGE supports the goal of the Ontario government to make Ontario barrier-free by 2025. As we move closer to that date, it is expected the EDGE services and facilities will become progressively more accessible and responsive to the needs of persons with disabilities.

The Accessibility Standards for Customer Service, Ontario Regulation 429/07, s2 came into force on January 1, 2008, and is the first accessibility standard created under the authority of the AODA. The EDGE is required to become compliant with the regulation by January 1, 2012.

Whenever new or revised standards are developed under AODA, this policy will be reviewed and updated as necessary to ensure consistency.

This policy has been prepared to outline what EDGE must do to comply with the regulation, and what our customers may expect from us.

The definition of disability under the AODA is the same as the definition of disability in the Ontario Human Rights Code. Accessibility for Ontarians with Disabilities Act (AODA) Section 2 states that "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.

The EDGE is committed to ensure that all persons receive excellent customer service, including people with disabilities. We will strive at all times to provide services in a way that respects the dignity and independence of persons with disabilities.

Accessible Customer Service will be provided by all employees who communicate with the public, all management and program staff who develop our policies and procedures.

Assistive Devices

Assistive devices are usually devices that people bring with them, such as, walkers, personal oxygen tanks, magnification devices, wheelchairs, canes, or other mobility devices that assist the person with daily living.

The EDGE is committed to servicing persons with disabilities who use assistive devices to obtain, use, or benefit from our services.

The EDGE will ensure that staff are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our facility and services, and that staff know how to use the assistive devices which are available on our premises, including electronic door openers.

Exceptions may occur if the EDGE has determined that an assistive device may pose a risk to the health or safety of a person with a disability, or others on the premises.

It is the responsibility of the person to ensure that their assistive device is operated in a safe and controlled manner at all times.

Communication

Communication is a process of providing, sending, receiving and understanding information, and this section of the regulation is a requirement to communicate with an individual in a way that takes their disability into consideration, and allows effective communication.

The EDGE shall communicate with people with disabilities in ways that take into account their disability.

The EDGE will train staff who communicate with customers, on how to interact and communication with persons with various types of disabilities.

Service Animals

Service Animals are used by people such as dogs used by people who are blind, hearing alert animals for people who are Deaf, deafened, or hard of hearing; and animals trained to alert an individual to an oncoming seizure.

A service animal is defined in the Act as:

Any animal where it is readily apparent that the animal is used by the person for reasons relating to his or her disability, and if the person provides a letter from a physician or nurse or other government issued certification confirming that the person requires the animal for reasons relating to the disability.

The EDGE welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public. The EDGE will ensure that staff are trained in how to interact with persons with disabilities who are accompanied by a service animal.

Exceptions may occur, where a manager may determine that a support person is required, or that a service animal cannot enter an area of the premises if it may pose a health or safety risk to others on the premises.

Support Persons

Support Persons can accompany a person with a disability to provide assistance. They can be a professional, a family member, a friend, or other person who assists a person with a disability with communication, mobility, personal care, medical needs, or with access to goods or services. They will be allowed to accompany them on our premises; however there may be documentation necessary for customer privacy purposes. We will notify customers of this through a notice posted on our premises and on our website.

Notice of temporary disruptions

In the event of a planned or unexpected disruption to services or facilities normally used by people with disabilities to access goods or service, such as malfunctioning auto door device, the EDGE will notify customers with a clearly posted notice which will include the reason for the disruption, and its anticipated length of time; with a description of alternative facilities or services if available. The notice will be placed at the public entrance to our building, and on our website if/as applicable to the disruption at edgebenefits.com. Appendix C

Training for Staff

The EDGE will provide training to employees who deal with the public on our behalf, who are involved in the development and approvals of customer service policies, practices, and procedures. New staff, and staff who commence new duties that involve interaction with the public, will receive training as part of their orientation.

Specifically, individuals in the following positions will be trained:

Customer Service Representatives, Claims Customer Care Case Consultants, Administrative Staff, Executive Management Group, Sales Representatives.

This training will be provided to staff as soon as possible after hiring, and to all existing staff on an on-going basis as changes are made. Training should help to dispel myths, misconceptions, stereotypes, and fears about people with disabilities.

Training will include:

- An Overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard.
- The EDGE Accessibility Service Plan related to 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 support person.
- How to use the automatic door opener and/or other on-site equipment or devices to help people with disabilities.
- What to do if a person with a disability is having difficulty in accessing The EDGE facility, goods, or services.
- Staff will also be trained when changes are made to The EDGE accessibility plan.
- All employees will be required to complete the Accessible Customer Service online training module "Serve-Ability".
- The EDGE will keep training records including names, dates, and content of training provided to each employee.

Modifications to other policies

The EDGE will remove any policy that does not respect and promote the dignity and independence of people with disabilities, and will ensure that our customer service policies, practices, and procedures, respect and promote the dignity and independence of all persons with disabilities. No change will be made to this policy before considering the impact on persons with disabilities.

The Edge Benefits Integrated Accessibility Policy

Accessibility standards have been created as part of AODA. The standards are rules that businesses and organizations in Ontario need to follow to identify, remove, and prevent barriers so that people with disabilities have more opportunities to participate in everyday life.

The Accessibility Standard for Customer Service was the first standard to become law. The next 3 standards (Information and Communications, Employment, and Transportation) have been combined under one regulation, The Integrated Accessibility Standards Regulation. This regulation is now law, and the requirements are being phased in between 2011 and 2021.

The Accessibility standard for built environment (buildings and outdoor spaces) is in development and is not yet law.

This 2014-2021 Accessibility plan outlines the policies and action that The EDGE will put in place to improve opportunities for people with disabilities.

The Edge Benefits is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

The Edge Benefits is committed to meeting the communication needs of people with disabilities. We will follow universal design principles and best practices when developing, implementing and maintaining information and communications strategies and products. This includes websites, intranet sites, communications materials, telephone communications and face-to-face interactions. The goal is to achieve the most effective and efficient access to information for all users.

Training

The Edge Benefits will provide training to employees, volunteers and other staff members on Ontario's accessibility laws and on the Human Rights Code, as it relates to people with disabilities. We will take steps to ensure that employees are provided with training needed to meet Ontario's accessible laws, via small training sessions in groups, and will make this training part of the orientation training for all new employees. We will keep training records including names, dates, and content of training provided to each employee.

Information and Communications Standard

Feedback:

The EDGE will ensure Customers who wish to provide feedback on the way The EDGE provides goods and services, or on our accessibility formats and communication supports, can do so via our website (Appendix B), electronically, and verbally through our Customer Service Call Centre.

The Edge Benefits will ensure that existing feedback processes are reviewed and accessible to people with disabilities, in accessible formats upon request.

Accessible formats and communication supports:

The Edge Benefits will take steps to ensure that all publicly available information is made accessible upon request.

Accessible Websites and web content:

The Edge Benefits is committed to meeting the communication needs of people with disabilities. We will develop guidelines and best practices for creating accessible documents for common desktop applications such as MS Word, Excel and PowerPoint.

The Edge Benefits will take the following steps to make all new websites and content on those sites, conform to the WCAG 2.0, Level **A**, by January 1, 2014, and content conform with WCAG 2.0, Level **AA**, by January 1, 2021.

Employment Standard

The Edge Benefits is committed to fair and accessible employment practices.

We will take steps to notify the public and staff that, when requested, The EDGE will accommodate people with disabilities during the recruitment and assessment processes and when people are hired, and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability.

The return to work process shall, outline the steps The EDGE will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and use documented individual accommodation plans, as part of the process.

The EDGE is committed to achieving a culture and work environment that is supportive of employees with disabilities. In accordance with these principles, reasonable accommodation will be made on a case by case basis to meet the specific needs of employees and applicants, and systemically to make the EDGE as a whole accessible to employees and applicants with disabilities. The EDGE will consult with the employee making the request, to determine the suitability of the accessible format or communication support.

An accommodation must be reasonable and required, and may include:

- Workstation modifications
- Temporary alternative work
- Flexible or alternative work schedules
- Temporary alternate job duties
- Temporary relocation

The process for the individual accommodation plans shall include the following:

 The manner in which The EDGE can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer

- in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
- The manner in which the employee can request the participation of a representative from the workplace, in the development of the accommodation plan.
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee in a format, that takes into account the employee's accessibility needs due to disability.

Essential requirements:

The core functions of a job, having regard to productivity (both in terms of the amount of work product and the timeliness of the work product) and the importance of any function. We will ensure that the following are part of the process for individual consideration:

- accommodations must assist in the inclusion of persons with disabilities into employment activities.
- individuals are to be accommodated in ways which respect their dignity.
- accommodation is to be made only for those disability related needs disclosed by the employee or applicant which impact on employment.
- accommodation needs are to be addressed in a way that is consistent with responsible financial management and operational requirements
- accommodation requirements are determined on person-by-person basis by ensuring that each employee with a disability is considered, assessed and accommodated individually, while maintaining a process that is consistent with the principles of confidentiality, and shared responsibility.
- -the accommodation process requires the involvement and co-operation of the employee who requires the accommodation

Built Environment Standard

Design of Public Spaces

The Edge Benefits will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces.

The Edge Benefits will take the steps to prevent and remove accessibility barriers identified.

Emergency procedure, plans, or public safety information:

The Edge Benefits is committed to providing the customers and clients with publicly available emergency information in an accessible way, upon request.

We will also provide employees with disabilities with individualized emergency response information when necessary. If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, The Edge shall provide the workplace emergency response information to the person designated by The Edge to provide assistance to the employee. We shall provide the information required as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.

The Edge shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when The Edge reviews its emergency response policies.

Performance management:

The Edge Benefits is committed to providing our employees with an annual performance management process. If an employee has a disability we take into consideration any individual accommodation plans.

Career development and advancement:

The Edge Benefits is committed to career development and advancement within our organization. If an employee has a disability we take into consideration any individual accommodation plans.

Feedback:

For more information on our Customer Service or Accessibility Policy, please contact:

Email: customerservice@edgebenefits.com or

Website: "contact us" on our website at edgebenefits.com

Phone: 1-800-908-9917

Mail: The Edge Benefits, 1255 Nicholson Rd., Newmarket, Ont. L3Y 9C3

Accessible formats of this document are available free upon request.

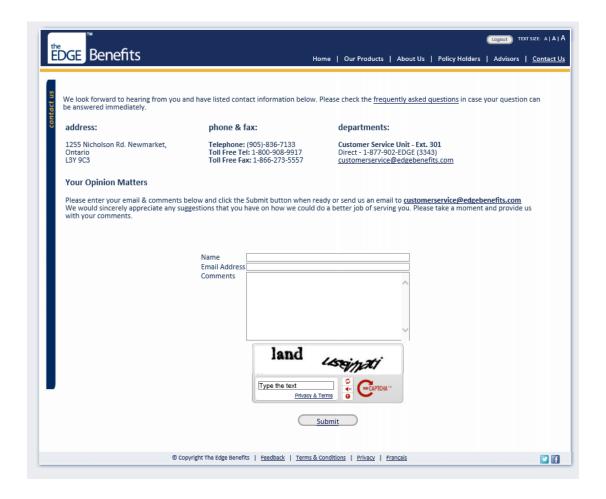
Appendix A

The Edge Benefits Multi-Year Accessibility Plan

(see attached document)

Appendix B

Customer Service Website Feedback



Appendix C

Notice of Planned Interruption in Service Document

There will be a schedule service disruption at 1255 Nicholson Rd., Newmarket for (indicate reason) impacting the delivery of goods and services for customers on (date).

The goods and services unavailable during this service disruption are:

- 1. (service/event name) (floor)
- 2. (service/event name) (floor)

The services listed above will be accessed again at (date/time/)

We apologize for any inconvenience this disruption has caused. Should you require any additional information on the delivery of this service, please call our office at 1-800-908-9917.