



Statement of Commitment

Miller Insurance Brokers 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 by meeting our accessibility requirements under Ontario's accessibility laws.



Multi-Year Accessibility Plan 2024-2028

RECENT ACCESSIBILITY ACCOMPLISHMENTS:

Over the last few years, Miller Insurance has made dedicated efforts in providing an environment that includes the participation and inclusion of persons with disabilities. While some initiatives were undertaken to include recent updates and changes to the AODA, Miller Insurance inherently determined the need to address barriers and implement change or modifications to be inclusive. Some of our more recent initiatives are summarized in the following section:

- We confirmed our commitment to openness to service animals and support persons to assist people with disabilities with adoption of the policies on accommodation of service animals and support persons
- Miller Insurance is an equal opportunity employer in recruitment and retention of employees. Orientation for new staff and faculty incorporates a component on the diverse workplace and the support services available to address the needs of faculty or staff with suspected or identified disabilities.
- Miller Insurance offers training and professional development opportunities through the HR Downloads Inclusivity Series to all our employees to increase their knowledge on accessibility and inclusion.
- Miller Insurance has moved our Saugeen Shores location to a more accessible building with better accessible parking. We had previously done the same thing in our Harriston location.
- We have confirmed our commitment to inclusiveness and access to a barrier free environment throughout all stages of the recruitment and selection process for employees and volunteers
- We have implemented accessibility options when making modifications to the website and printed materials
- Provided a mechanism through our website for feedback

ACTIONS PLANNED FOR 2024-2028

Miller Insurance has set forth a five-year plan to bring accessibility and inclusion to the forefront of its operations, while ensuring ongoing legal compliance with the AODA.

The following initiatives have been identified to ensure ongoing compliance with accessibility legislation:

CUSTOMER SERVICE	2024	2025	2026	2027	2028
Update and continue to deliver education/ Training to staff regarding customer service of individuals with disabilities including orientation upon hire	X	x	x	x	x
Make improvements to accessibility based on suggestions, training, and ongoing consultation with persons experiencing disabilities	X	x	x	x	X
Information and Communications					

Identify commonly required communications formats and develop a strategy to ensure consistency across our website, publications and promotional material	X	x	x	x	x
Employment Accommodations	2024	2025	2026	2027	2028
Include a statement in all staff recruitment/ postings confirming commitment to accommodation of applicants with a disability	x	x	x	x	x
Continue to make new hires aware on orientation of Miller Insurance 's commitment to accommodating Employees with disabilities	x	x	x	x	x
Built Environment	2024	2025	2026	2027	2028
Consider AODA requirements in the selection and design of any new office and program space	x	x	x	x	x
Replace all fire safety devices with sound/ strobe combo Units		x	x		
Replace all doors closers leading to accessible areas with automatic door closers			x	x	x
Install Tactile Walking Surface indicators (TWSI) on all outdoor pathways and in all stairwells		x	x	x	
Identify and complete needed accessibility improvements in existing offices	x	x	x	x	x

COMMUNICATION OF MULTI-YEAR ACCESSIBILITY PLAN

This plan is the next step in establishing a framework and vision for an inclusive culture at Miller Insurance Brokers. Miller Insurance will be transparent in its work and continued progress towards these goals by providing updates on its website. This plan will be posted on the Miller Insurance and copies made available upon request.

CONTACT INFORMATION

Questions or comments about Miller Insurance's accessibility plans, policies and practices are always welcome. Should you require a copy of our documents in standard or accessible format, please contact:

By email:

Stacey Millar (smillar@millerinsurance.ca)

By telephone:

Telephone: 519-800-3000 Ext. 103



All goods and services provided by Miller Insurance Brokers will follow the principles of dignity, independence, integration, and equal opportunity.

This policy meets the requirements of the customer service standards included in the *Integrated Accessibility Standards Regulation* under the *Accessibility for Ontarians with Disabilities Act, 2005*. It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

Definitions

Assistive device: A technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them, such as a wheelchair, walker, or a personal oxygen tank, and that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.

Disability: As defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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;
- A condition of mental impairment or a developmental disability;
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Guide dog: A highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety, and increased independence for people who are blind.

Service animal: A service animal for a person with a disability if:

1. The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
2. The person provides documentation from a member of one of the following regulated health professional colleges confirming that the person requires the animal for reasons relating to the disability:
 - 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; or
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support person: In relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

Guidelines

The Provision of Goods and Services to Persons with Disabilities

Miller Insurance Brokers will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring that all customers receive the same value and quality;
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services, as long as this does not present a health and safety risk;
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual accommodation needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

The Use of Assistive Devices

Customer's Own Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the company.

In cases where the assistive device presents a health and safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services, up to the point of undue hardship.

For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank might involve ensuring the customer is in a location that would be considered safe for both the customer and business.

Alternatively, where elevators are not present and where a customer requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

Guide Dogs and Service Animals

A customer with a disability who is accompanied by a guide dog or service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs or service animals.

Staff may respectfully ask if an animal is a service animal and will not ask the nature of the person's disability or purpose of the animal.

Applicable Laws

Dog Owners' Liability Act, 2005: If there is a conflict between a provision of this legislation or of a regulation under this or any other act relating to banned breeds (such as pit bulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails. Staff will respectfully explain that the service animal must be removed from the public area due to a municipal by-law and make alternate arrangements or provide the service outside the public area.

Recognizing a Guide Dog or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to their disability, Miller Insurance Brokers may request verification from the customer.

Care and Control of the Animal:

The customer who is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all times.

Allergies and Other Health and Safety Concerns

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, Miller Insurance Brokers will make all reasonable efforts to meet the needs of all individuals. Pursuant to the company's obligations under the *Human Rights Code* and the *Occupational Health and Safety Act*, each customer's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

Due diligence needs to be paid to address health and safety requirements. For example, if a person's health and safety could be seriously affected by the presence of a service animal on the premises open to the public, management must fully analyse all options for safely accommodating the service animal. Options could include creating distance between the two individuals to eliminate in-person contact, changing the time the two individuals receive service, or using air purifiers and other measures that could allow the person to use their service animal on the premises.

In very exceptional circumstances where a service animal becomes out of control, causing a clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises.

As a courtesy, particularly if the person and service animal have been in attendance on the premises for a long time, staff may ask whether the animal requires water, may designate an area in which the service animal can relieve itself, or ask whether the staff can be of assistance pertaining to the service animal.

The Use of Support Persons

If a customer with a disability is accompanied by a support person, Miller Insurance Brokers will ensure that both persons may enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, the company will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer before any potentially confidential information is mentioned.

Notice of Disruptions in Service

Service disruptions may occur for reasons that may or may not be within the control or knowledge of Miller Insurance Brokers. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use goods or services, reasonable efforts will be made to provide advance notice. In some circumstances, such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

If a notification needs to be posted, the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

When disruptions occur, Miller Insurance Brokers will provide notice by:

- Posting notices in conspicuous places, including at the point of disruption, at the main entrance, and the nearest accessible entrance to the service disruption, or on the company website;
- Contacting customers with appointments;
- Verbally notifying customers when they make a reservation or appointment; or
- By any other method that may be reasonable under the circumstances.

Customer Feedback

Miller Insurance Brokers shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available by (insert how the process will be publicized). Feedback forms, along with alternate methods of providing feedback verbally (in person or by telephone) or written (handwritten, delivered, website, or e-mail), will be available upon request.

Submitting Feedback

Customers can submit feedback to:

Employee name and position title

Phone number

Mailing address

E-mail address

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Miller Insurance Brokers employee.

(Note: Update if feedback should only be supplied to specific individuals, such as customer service, guides, hospitality, and so on)

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Training

Training will be provided to:

- Every employee of or a volunteer with Miller Insurance Brokers;
- Every person who participates in developing the policies of Miller Insurance Brokers; and
- Every other person who provides goods, services, or facilities on behalf of Miller Insurance Brokers.

Training Provisions

Regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*;
- A review of the requirements of the customer service standards;
 - Instructions on how to interact and communicate with people with various types of disabilities;
- Instructions on how to interact with people with disabilities who:
 - Use assistive devices;
 - Require the assistance of a guide dog or other service animal; or
 - Require the use of a support person (including the handling of admission fees);
- Instructions on what to do if a person with a disability is having difficulty accessing our services; and
- Policies, procedures, and practices of the company pertaining to providing accessible customer service to customers with disabilities.

Training Schedule

Miller Insurance Brokers will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents, and contractors during orientation. Revised training will be provided in the event of changes to legislation, procedures, policies, or practices.

Administration

If you have any questions or concerns about this policy or its related procedures, please contact:

Stacey Millar, VP of Operations And Service

1-800-265-3000, smillar@millerinsurance.ca

1115 Sutton Street, Kincardine, ON, N2Z 2C5

This policy and its related procedures will be reviewed as required in the event of legislative changes or changes to company procedures.



AODA Employment Standards Policy- Ontario

Miller Insurance Brokers is dedicated to providing accessible services and work environment for all employees, prospective employees, and clients. This policy outlines the company's compliance with Parts I and III of the *Integrated Accessibility Standards Regulation (IASR)* set forth under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*.

This policy ensures Miller Insurance Brokers provides services and employment practices that follow the principles of dignity, independence, integration, and equal opportunity.

Definitions

Accessible format: Includes large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Communication supports: Includes captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communication.

Information: Includes data, facts, and knowledge that exists in any format, including text, audio, digital, or images, and conveys meaning.

Career development and advancement: Additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization or any combination of them. Both additional responsibilities and employee movement are usually based on merit, seniority, or a combination of both.

Performance management: Activities related to assessing and improving employee performance, productivity, and effectiveness with the goal of facilitating employee success.

Redeployment: The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

Support person: In relation to a person with a disability, another person who accompanies a person with a disability in order to help with communication, mobility, personal care, or medical needs, or with access to goods, services, or facilities.

General Principles

ESTABLISHMENT OF ACCESSIBILITY POLICIES AND PLANS

Miller Insurance Brokers will develop, implement, and maintain policies governing how it will achieve accessibility through these requirements.

The company is committed to meeting the accessibility needs of persons with disabilities in a timely manner. This is reflected in policies which upon request will be made publicly available in an accessible format.

The company will establish, implement, maintain, and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format upon request.

The company will review and update its accessibility plan once every five years and will establish, review, and update its accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared to report on the progress of the steps taken in implementing the companies' accessibility plan. If requested, the report will be created in an accessible format.

Training Requirements

Miller Insurance Brokers will provide training for its employees and volunteers regarding the IASR and the Ontario *Human Rights Code* as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing the company's policies, and all other persons who provide goods, services, or facilities on behalf of the company.

Training will be provided as soon as is reasonably practicable, but no later than. Training will be provided regularly to new employees and as changes to the companies' accessibility policies occur.

Miller Insurance Brokers will maintain records on the training provided, when it was provided, and the number of employees who were trained.

Recruitment, Assessment and Selection

Miller Insurance Brokers will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, the company will consult with the applicant and provide or arrange for suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

Successful applicants will be made aware of the company's policies and supports for accommodating people with disabilities.

Accessible Formats and Communication Supports for Employees

Miller Insurance Brokers will ensure that employees are aware of policies for employees with disabilities and any changes to these policies as they occur. The company will provide the information required to new employees as soon as practicable after they begin their employment.

If an employee with a disability requests it, the company will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform their job; and
- Information that is generally available to all employees in the workplace.

The company will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

Workplace Emergency Response Information

Where required, Miller Insurance Brokers will create individualized workplace emergency response plans for employees with disabilities. This information will be created in consultation with the employee and take into account the unique challenges created by the individual's disability and the physical nature of the workplace.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; or
- The company reviews general emergency response policies.

Documented Individual Accommodation Plans

Miller Insurance Brokers will develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The development process for these plans will include:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed individually;
- The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine whether accommodation can be achieved, or how it can be achieved;

- The ways that an employee can request the participation of a representative from their bargaining agent or other representative from the workplace (if the employee is not represented by a bargaining agent) for the creation of the accommodation plan;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

The individual accommodation should also include information regarding accessible formats, communication supports (upon request), individualized workplace emergency response information, and any other accommodation provided.

Return to Work

Miller Insurance Brokers will develop and implement return-to-work processes for employees who are absent from work due to a disability and require disability-related accommodations in order to return to work.

This process will outline the steps the company will take to enable a smooth return to work for the employee. All steps and individual accommodation plans will be documented and created in consultation with the employee.

Performance Management and Career Changes

Miller Insurance Brokers will consider the accessibility needs, including documented individual accommodation plans, of employees with disabilities during the company's performance management process. These will also be considered in the event of redeployment, or when offering career development or advancement opportunities.

Review

This policy will be reviewed regularly to ensure that it reflects current practices of Miller Insurance Brokers as well as legislative regulations.