

THE BPA FINANCIAL GROUP

ACCESSIBLE CUSTOMER SERVICE POLICY

FOR ALL BPA EMPLOYEES



Accessible Customer Service Policy

Intent

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*, and applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

The provision of goods and services by Benefit Plan Administrators Limited shall follow the principles of dignity, independence, integration and equal opportunity.

Scope

- a) This policy applies to the provision of services at premises occupied by and/or operated by Benefit Plan Administrators Limited.
- b) This policy applies to employees, agents and/or contractors who deal with the public or other third parties that act on behalf of Benefit Plan Administrators Limited.
- c) The section of this policy that addresses the use of guide dogs, service animals and service dogs applies to the provision of services that take place at premises operated by Benefit Plan Administrators Limited.
- d) This policy shall also apply to all persons who participate in the development of the Benefit Plan Administrators Limited's policies, practices and procedures governing the provision of services to members of the public or third parties.

Definitions

Assistive Device – is 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 that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability – the term 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 – is 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 – as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

- it is readily apparent in the opinion of Benefit Plan Administrators Limited that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Support Person – as reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

General Principles

In accordance with the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Customer Feedback
- G. Training
- H. Notice of Availability and Format of Required Documents

A. The Provision of Services to Persons with Disabilities

Benefit Plan Administrators Limited 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 of service;
- allowing customers with disabilities to do things in their own way, at their own pace when accessing services as long as this does not present a 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 needs when providing goods and services; and

- communicating in a manner that takes into account the customer's disability.

B. Assistive Devices

Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing services provided by Benefit Plan Administrators Limited.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to facilitate the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that 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, service animals and/or service dogs.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent to Benefit Plan Administrators Limited that the animal is being used by the customer for reasons relating to his or her disability, Benefit Plan Administrators Limited may request verification from the customer.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

A customer that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

Allergies:

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, Benefit Plan Administrators Limited will make all reasonable efforts to meet the needs of all individuals involved.

D. Support Persons

If a customer with a disability is accompanied by a support person, Benefit Plan Administrators Limited will ensure that both persons are allowed to 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 Benefit Plan Administrators Limited will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer prior to including the service person in any conversation where confidential information might be discussed.

E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Benefit Plan Administrators Limited. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use Benefit Plan Administrators Limited's 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.

Notifications will Include:

In the event that a notification needs to be posted the following information will be included unless it is not readily available or generally known:

- services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

Notifications Options:

When disruptions occur Benefit Plan Administrators Limited 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 and if appropriate on the Benefit Plan Administrators Limited website;
- contacting customers with appointments as applicable;
- verbally notifying customers when they are making a reservation or appointment;
- or
- any other method that may be reasonable under the circumstances.

F. Feedback Process

Benefit Plan Administrators Limited 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 via the "feedback" link on the BPA website. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request.

Submitting Feedback:

Customers can submit feedback to:

- Customer Service Department, Benefit Plan Administrators Limited
- 905-275-6466
- 90 Burnhamthorpe Road West, Ste. 300, Mississauga, Ontario L5B 3C3
- Website: bpagroup.com

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so at any Benefit Plan Administrators Limited site.

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

G. Training

Training will be provided to:

- a) all employees, and/or contractors who deal with the public
- b) those who are involved in the development and approval of customer service policies, practices and procedures.

Training Provisions:

As reflected in *Ontario Regulation 429/07*, 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 *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.
- 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, service dog or other service animal; or
 - require the use of a support person.
- Instructions on how to use equipment or devices that are available at Benefit Plan Administrators Limited's premises or that are provided that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing services at Benefit Plan Administrators Limited.
- Benefit Plan Administrators Limited's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

Benefit Plan Administrators Limited will provide training as soon as practicable. Training will be provided to new employees who deal with the public or act on its behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

Benefit Plan Administrators Limited will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Notice of Availability and Format of Documents

Benefit Plan Administrators Limited shall notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information on the Benefit Plan Administrators Limited's website and/or any other reasonable method.

Administration

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

Acknowledgement & Agreement

I, _____ acknowledge that I have read and understand the Accessibility Standards for Customer Service Policy of Benefit Plan Administrators Limited. Further, I agree to adhere to this Policy and will ensure that employees working under my direction adhere to these guiding principles. I understand that if I violate this Policy, I may face corrective action, up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Witness: _____