

## CCG Accessibility Employment Standards Policy

### Overview

CAA Club Group of Companies (CCG) strives to exceed the expectations of its members, brokers, clients, and customers, including people with disabilities. CCG is committed to complying with all applicable provincial accessibility legislation and regulatory requirements, including Accessibility Standards for Employment under the Ontarians for Disabilities Act (AODA, 2005); the Accessibility for Manitoban's Act (AMA, 2013) and Quebec's Act to secure handicapped persons in the exercise of their rights with a view to achieving social, school and workplace integration (2004) amongst others.

Our policies, practices and measures reflect the principles of dignity, independence, integration, and equal opportunity for people with disabilities.

This policy applies to CAA Club Group (CCG) and its affiliated companies, including CAA Insurance Company, Orion Travel Insurance Company, Echelon Insurance, CAA South Central Ontario, CAA Manitoba and CAA Services (South Central Ontario) Inc. These are collectively referred to as "CAA Club Group of Companies".

### Intent

We aim to remove barriers in our workplace. If a barrier cannot be removed, we seek to provide reasonable accommodations to affected employees.

### Application

This policy is applicable to all CCG's employment candidates and employees, including, students, co-ops, interns, and third-party vendor or independent contractor that is either considered or engaged to performed work for CCG.

The following policy statements, organizational practices and measures are intended to meet the requirements under applicable provincial accessibility standards for Employment.

### Recruitment & Selection

- We include a statement on all job postings that reasonable accommodations are available to applicants with disabilities, and we seek their advice on how best to accommodate their needs.

All internal and external job postings will include the following language:

*"We are an equal opportunity employer, and we invite women, members of visible and ethnic minorities, Aboriginal people, and people with disabilities to apply. If you require an accommodation, please notify us and we will work with you to meet your needs."*

- When making interview arrangements in writing or verbally, we inform applicants that reasonable accommodations are available during the entire recruitment and selection processes.

During each phase of the recruitment process (phone interview, email confirmation) the following language is communicated:

*“CCG offers accommodations for applicants with disabilities in all stages of the recruitment process. If you require an accommodation, please advise us, and we will work with you to meet your needs.”*

### **Accessible Interviewing Checklist**

The following guidelines can be used to prepare as applicants are contacted for interviews, to help to ensure bias-free hiring and compliance (only if disability has been disclosed).

- Location of the interview – Can an applicant with a disability access your facilities?
- Format of the skills assessment tests – Are your assessment tests accessible to an applicant with a disability? Do the tests allow a candidate to demonstrate their knowledge and skills?
- Room set-up for in-person interviews – Is your interviewing room set up in an accessible location?
- Interviewing timelines – Can an individual with a disability perform, in the interview, within the timelines expected?
- Support – Can an individual with a disability bring a support person to an interview?
- Paperwork – Can the individual fill out any paperwork that is required?

When an applicant has made a request for an accommodation during the selection process, we:

- Consult with the applicant to determine the appropriate accommodation.
- Put the appropriate accommodation in place during the assessment or selection process.

When a job applicant who has requested accommodations is contacted, the following will be discussed:

- Thank the candidate for their application.
- Let the candidate know what they can expect from the interview process.
- If accommodations are required, ask which kind of accommodation is needed.
- Arrange the meeting time and location (unless accessibility information is pending).
- Ensure that the candidate knows how to get to the interview room (if applicable)
- Thank the candidate and ask them if they have any questions.

### **Workplace Accommodations when Offering Employment**

When hiring, we inform selected applicants of our measures, policies, and practices for accommodating employees with disabilities.

### **Notice to Successful Applicants**

CCG shall notify job applicants of their policies for accommodating employees with disabilities when offering employment.

Job offers will include the following language:

*“CAA Club Group has an accommodation process in place and provides accommodations for employees with disabilities. If you require a specific accommodation due to a disability or a medical need, please contact [company representative’s name and title] at [telephone number] or by email at [e-mail address] so*

*that arrangements can be made for the appropriate accommodations to be in place before your employment.”*

### Informing Employees about accommodation policies and practices

CCG shall inform new and existing employees of their policies for supporting employees with disabilities, including providing employment-related accommodations for disabilities.

Employees are to be informed of policies that are available to support those with disabilities. CCG will inform employees of policies available for supporting employees with disabilities as soon as it is practicable after employment begins, or as this requirement comes into effect. In addition, CCG will inform all employees when there is a change to those policies supporting employees with disabilities.

Information will be provided in the following ways:

- Emails
- Staff memos
- Intranet
- Leadership Resource Centre
- Management Onboarding
- Staff Meetings
- Annual mandatory training

It is critical that employees are kept up to date and aware of CCG’s policies because individuals can acquire disabilities at any point in their lives, which may require employment-related accommodations.

CCG’s Associates have the right to voluntarily disclose the status of their disability to management at any point during their employment. Should a request for accommodation be needed, the Associate will communicate with their Leader. The Leader, HR and Associate will discuss the terms of accommodation and complete the Associate Accessibility Accommodation Plan.

### Accessible Formats and Communication Supports for Employees with Disabilities

CCG aims to meet the communication needs of our employees by providing workplace information and communications in ways that are easy to access for everyone.

If requested by an employee with a temporary or permanent disability, we:

- Consult with the employee to identify the accessible formats, or communication supports needed when providing information to the employee.
- Ensure that identified accessible formats or communication supports are continually used when providing information to the employee.

To meet an employee’s communication needs, we ask the employee what accessible format or communication support is most appropriate for them.

- We provide information to employees in multiple ways to meet everyone’s needs, including (such as posting information in our office locations, intranet sites, and circulating information electronically by email in accessible formats).

- Upon submission of the Request for Information in an Alternate Format Form, CCG will consult with Associates with disabilities to determine which accessible formats or communication support they require. Once the needs are determined, CCG will establish a method to accommodate the person.
- The accessible formats and/or communication support that have been developed for the employee should also be included in the individual's accommodation plan.

### Documented Individual Accommodation Plans

CCG shall develop written individual accommodation plans for employees with disabilities.

Under provincially applicable Employment Standards, CCG is required to develop individual accommodation plans for employees with disabilities of which we have been made aware. There may be times where the manager may initiate a dialogue to offer assistance and accommodation to an employee who is clearly unwell or perceived to have a disability.

### CCG's Written Accommodation Process:

CCG is committed to providing accommodations for people with disabilities. When an Associate with a disability requests an accommodation, the following process will be followed.

#### Step 1: Recognize the Need for Accommodation

The need for accommodation can be:

- Requested by the Associate through their manager or through Human Resources; or
- Suggested by the Associate's manager or the hiring manager. Individuals with disabilities shall be consulted with regards to accommodations to preserve their independence and dignity.

#### Step 2: Gather Relevant Information and Assess Needs

The Associate is an active participant in this step:

- CCG does not require details on the nature of the employee's disability to provide an accommodation; it needs to know only about the employee's functional abilities.
- The manager or HR may ask for a functional capacity assessment at the company's expense.
- The Associate, their manager and HR evaluate potential options to find the most appropriate measure.
- An external expert may be involved, at the company's expense.
- The employee can request the participation of a representative from her bargaining agent or, if there is no bargaining agent, from a different representative from the workplace.

#### Step 3: Write a Formal, Individual Accommodation Plan

Once the most appropriate accommodation has been identified, the accommodation details are written down in a formal plan, including:

- accessible formats and communication support, if requested.
- workplace emergency response information, if required.
- any other accommodation that is to be provided.

The accommodation plan is provided to the Associate in a format that considers their accessibility needs due to their disability:

- The Associate's personal information is always protected.

- If an individual accommodation is denied, the manager/HR provides the employee with the reason for the denial, in a format that aligns with the Associate's needs.

#### **Step 4:** Implement, Monitor, and Review the Accommodation Plan

The employee and their manager monitor the accommodation to ensure that it has effectively resolved the challenge:

- Formal reviews are conducted at a predetermined frequency.
- The accommodation plan is reviewed if the Associate's work location or position changes.
- The accommodation is reviewed if the nature of the employee's disability changes.

If the accommodation is no longer appropriate, the Associate, the manager and HR will work together to gather relevant information and reassess the Associate's needs for CCG to find the best accommodation measure (Step 2).

#### [Workplace Emergency Response Information](#)

CCG shall prepare for the specific needs that employees with disabilities may have in emergency situations.

When to provide Individual Workplace Emergency Response Information:

- When the employee's disability is such that the information is necessary; and
- The employer is aware of the need for accommodation due to the employee's disability.

The Leader will work in partnership with HR, the H&S Specialist, and the Associate to:

- Identify potential barriers during an emergency response.

Complete the Individualized Associate Emergency Response Information Form. The forms are available on our company intranet, or you can contact your HRC directly to obtain copies if required. Once the plans have been completed, ensure a support person has been assigned where needed, and review on a regular basis should the requirements or needs change at any time.

#### [Return to Work Process](#)

CCG shall have in place a documented process for supporting employees who return to work after being away for reasons related to their disabilities. If an individual's illness or injury is covered by the Return to Work provisions of the Workplace Safety and Insurance Act, Worker's Compensation Board of Manitoba, or any other provincial body, then the applicable jurisdictional legislation work would apply.

The Benefits Specialist in partnership with the HRC will provide support to the employee if the employee requires some form of disability related accommodation to return to work.

CCG's third-party benefits partner would manage the Return to Work process on behalf of CCG. They work in partnership with CCG so that all parties understand the type of accommodation that is required to bring an employee back to work in a safe and timely manner. The Return to Work

Plan will outline the specific accommodation strategies that need to be in place within the work environment. Any barriers to reintegrating the employee would be discussed.

Return to Work processes may be appropriate for employees who have permanent, recurring, or temporary disabilities.

### Performance Management

CCG shall use performance management processes that will consider the accessibility needs of employees with disabilities.

Performance management processes may be informal or formal.

The following are ways in which CCG can consider the accessibility needs of employees with disabilities in their performance management process:

- Review the employee's individual accommodation plan to understand the employee's accommodation needs and determine whether it needs adjusting to improve his or her performance on the job.
- Have documents related to performance management, such as performance plans, available in accessible formats.
- Provide informal and formal coaching and feedback in a manner that considers an employee's disability, such as using plain language for an individual with a learning disability.

Attendance & Performance Management will also include language to ensure that managers will consider the accessibility needs of employees with disabilities.

To ensure that Managers are aware that the needs of the disability are to be taken into consideration, information will be provided during the Leadership Onboarding, Performance & Attendance Management training.

Good practice:

- Be aware of potential barriers and biases.
- Distinguish between disability-related and performance-related issues.
- Consider the SMART approach.

### Career Development and Advancement

CCG shall provide career development and advancement opportunities that will consider the accessibility needs of their employees who have disabilities. This may provide employees with disabilities with the opportunities to advance within their organizations.

Although an employee with a disability may be accommodated to perform a specific role, CCG may have other opportunities for which the employee is well-suited.

When providing career development and advancement opportunities, the following should be considered:

- What accommodations employees with disabilities may need to succeed in another role
- What accommodation employees with disabilities may need to take on new responsibilities in their current position.
- A review of the individual accommodation plan to learn what adjustments may be needed for the new responsibilities.
- Ensure disability does not limit access to career development and advancement opportunities.
- That open communication is taking place with the employee regarding career aspirations and remove potential barriers.

### Redeployment

CCG shall use redeployment processes that will consider the accessibility needs of employees with disabilities when moving them to other positions, so that employees can continue to have their accommodation needs met.

When considering redeployment, the following will be considered:

- Accessibility needs of employee with the disability.
- Reviewing the individual accommodation plans
- Adjusting support to fit their new roles.
- HRC to connect with Facilities to provide an overview on the Individual Accommodation Plan
- Consider accessibility needs before changes are implemented.

By considering the accessibility needs of the employee with disability when redeploying, CCG may help these employees continue to contribute effectively.

### Maintaining Privacy for Employees with Disabilities

We protect the privacy and confidentiality of employee's personal information and personal health information. We only collect, use, and disclose information as required for the purposes of the applicable provincial Accessibility Standards for Employment, unless otherwise agreed to by the employee. We also follow the requirements of other provincial privacy legislation.

We follow proper protocol when collecting, storing, sharing, and disposing confidential employee information. For more information related to employee privacy, refer to [CCG's Associate Privacy Policy](#).

## References

[Accessibility for Ontarians with Disabilities Act \(AODA\)](#)

<https://www.ontario.ca/laws/regulation/110191>

[C.C.S.M. c. A1.7 \(gov.mb.ca\)](#)

[Accessible Employment Standard Regulation, M.R. 70/2019 \(gov.mb.ca\)](#)

[Act to secure handicapped persons in the exercise of their rights \(Quebec\)](#)

Policy Owner:

Chief Human Resources Officer

Administration and Contact Information

Human Resources – [accessibility@caasco.ca](mailto:accessibility@caasco.ca) or [HR@caasco.ca](mailto:HR@caasco.ca) or [hr@echeloninsurance.ca](mailto:hr@echeloninsurance.ca)