



Accessibility Policies and Practices and Multi Year Plan

Arthur J Gallagher

Ontario, Canada

2017

SUMMARY

The Government of Ontario passed the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). With this legislation, standards have been established for businesses and organizations in Ontario to identify, remove and prevent barriers so that people with disabilities will have more opportunities to participate in everyday life. The focus is on customer service, transportation, the built environment, information and communication, and employment.

Arthur J Gallagher (Gallagher) 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 while meeting requirements under the Accessibility for Ontarians with Disabilities Act.

Gallagher has developed a Multi-Year Plan that describes how it intends to become a more accessible organization over time and sets forth the principles of how it provides service and otherwise interacts with people with disabilities. This plan will be posted on the company web site and reviewed and updated periodically.

This plan relates to anyone that is a client, potential client, employed, or seeking employment, at the following businesses in Ontario:

Arthur J. Gallagher Canada Limited

Arthur J. Gallagher (Canada) Group

Gallagher Benefit Services (Canada) Group Inc.

Gallagher Bassett Canada Inc.

TRAINING

Gallagher will provide training to all employees in Ontario on the accessibility laws and the Human Rights Code to increase awareness and encourage respect for the core principles of independence, dignity, integration and equality of opportunity for people with disabilities.

Training will be provided through the company web based training portal (E-Learn) or in an alternate manner that best suits the employee.

The AODA training will occur within four (4) months of the employees start date with a focus on the following topics:

- The purpose and requirements of the Accessibility Act
- How to interact and communicate with people with various types of disabilities
- The purpose of assistive devices and how to interact with people who use them
- The purpose of service animals and how to interact with people who use them
- The purpose of support persons and how to interact with people who are accompanied by a support person
- What to do if a person with a disability is having difficulty accessing Gallagher services

Employees will also be required to read the Gallagher policies in addition to any other internal documents on accessibility.

Through the E-Learn system, Gallagher will keep a record of all training provided under the Act, including the individual who received the training, the dates on which the training was provided and the successful completion of the assessment.

EMPLOYMENT

Gallagher is committed to fair and accessible employment practices and will continue to take steps to notify applicants and employees that accommodations are available upon request for people with disabilities. These practices are available during recruiting, selection and candidate assessment as well as the duration of employment.

Gallagher has a process in place for individual accommodation plans and return-to-work policies for employees that have been absent due to a disability and will work with the employee to meet their needs upon their return.

Steps will be taken to ensure accessibility needs of employees with disabilities are taken into account during performance management, career development and redeployment processes.

Upon request, employees with disabilities will have an individual accommodation plan developed by Human Resources in consultation with the employee.

DEVICES AND ALTERNATIVE FORMATS

Current or potential clients of Gallagher may need to access our services with the use of assistive devices such as communication aids, cognition aids, personal mobility aids and medical aids.

These assistive devices may include:

- Manual and motorized wheelchairs
- Canes, crutches and walkers
- White canes
- Oxygen tanks
- Electronic communication devices
- Hearing aids
- Magnifiers

Gallagher strives to enable people with disability to benefit from the same quality of service as other clients. Physically-accessible areas of Gallagher premises include the following assistive devices, as appropriate:

- Automatic door openers
- Elevator or ramp
- Websites
- Accessible washroom

DESIGN OF PUBLIC SPACES

Gallagher will work with building management in each location to meet the standards for the public spaces and procedures will be put in place to prevent disruptions to the accessibility of public spaces. In the event there is a disruption, Gallagher will work with building management as appropriate to notify the public of the disruption.

Public spaces include:

- Outdoor paths of travel such as sidewalks, ramps, stairs and rest areas
- Parking lot or garage
- Reception areas

MULTI-YEAR ACCESSIBILITY PLAN

Gallagher consults, where appropriate, with various internal and external resources to help ensure we maintain accessibility and compliant with obligations under the AODA. Collaboration may include:

- Helping with accessibility related issues for employees and clients
- Supporting and promoting accessibility tools and guidelines
- Supporting and coordinating other initiatives
- Developing accessibility standards and practices

The multi-year accessibility plan will be posted on the company web site and updated, reviewed and updated as required.

GENERAL REQUIREMENTS		
Requirement	Actions	Status
Accessibility Policy <ul style="list-style-type: none"> Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation. 	<ul style="list-style-type: none"> Create policy Have an external legal review of the policy Publish the document on the web site Provide contact information to request accommodations 	Completed
Accessibility Plan <ul style="list-style-type: none"> Large organizations shall, a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation; b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years. 	<ul style="list-style-type: none"> Multi-year Accessibility Plan developed and posted on the Company's website. It will be provided in an accessible format upon request and will be reviewed and updated at least once every five years 	Completed Ongoing
Training <ul style="list-style-type: none"> Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, <ul style="list-style-type: none"> (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization 	<ul style="list-style-type: none"> Source training program suitable for compliance with the AODA Purchase the program and implement it through the companies on line education platform Ensure the training is assigned to employees within four (4) months of their start date Maintain a record of successful training completion 	Completed
INFORMATION AND COMMUNICATION STANDARDS		
Requirement	Action	Status
Feedback <ul style="list-style-type: none"> Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request. 	<ul style="list-style-type: none"> Feedback process created and posted on company website 	Completed
Accessible Formats & Communication Supports <ul style="list-style-type: none"> Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with 	<ul style="list-style-type: none"> Policy and process posted on website to address formats and communication supports based on individual requests 	Completed/ongoing

<p>disabilities, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons.</p> <ul style="list-style-type: none"> • The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support • Every obligated organization shall notify the public about the availability of accessible formats and communication supports 		
<p>Accessible Websites & Web Content</p> <ul style="list-style-type: none"> • Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out by the AODA 	<ul style="list-style-type: none"> • Make websites accessible • Apply criteria and requirements to all websites and web content • Employees receiving offer letters are made aware of accommodation policies 	Ongoing
EMPLOYMENT STANDARD		
Requirement	Actions	Status
<p>Recruitment</p> <ul style="list-style-type: none"> • Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes and when individually selected to participate in the selection process. 	<ul style="list-style-type: none"> • Notice added to website, job ads and postings • Applicants advised when setting up interviews as required 	Ongoing
<p>Informing Employees of Supports</p> <ul style="list-style-type: none"> • Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability • Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. • Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability 	<ul style="list-style-type: none"> • Communication to all employees, including new hires, through the HR policy manual, employee newsletter, intranet • Update employees as needed 	Completed Ongoing
<p>Accessible Formats & Communication Supports for Employees</p> <ul style="list-style-type: none"> • Every employer shall consult with the employee to provide or arrange for the provision of accessible 	<ul style="list-style-type: none"> • Upon request, the company will consult with an employee to determine which accessible format is required such as print, email, web site or verbally 	Ongoing

<p>formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace.</p> <ul style="list-style-type: none"> The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support 		
<p>Workplace Emergency Response Information</p> <ul style="list-style-type: none"> Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability. This will be provided as soon as possible after the need is identified When required, and with employee permission, the emergency response information will be provided to another individual dedicated to assist The emergency response will be reviewed with any change to the employees work location or accommodation needs 	<ul style="list-style-type: none"> Plan posted in common areas Employees are advised who they should notify if they require assistance or accommodation 	Completed/ongoing
<p>Documented Individual Accommodation Plans</p> <ul style="list-style-type: none"> Develop and document individual accommodation plans for associates with disabilities 	<ul style="list-style-type: none"> Develop process and any related policies or forms based on individual circumstances 	Completed/ongoing
<p>Return to Work Process</p> <ul style="list-style-type: none"> Develop and have in place a 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 and document the process. This includes the steps that will be taken to accommodate the employee 	<ul style="list-style-type: none"> Outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away 	Completed/ongoing
<p>Performance Management/Career Development & Advancement/Redeployment</p> <ul style="list-style-type: none"> Take into account an employee's disabilities for any of the above employment situations 	<ul style="list-style-type: none"> Review an individual's accommodation plan to understand their needs and determine if adjustments are need to improve performance Provide formal and informal coaching in a manner that is consistent with accommodation plans and disabilities Review individual accommodation plans when moving an individual to another location or role in the organization 	As needed/ongoing

CLIENT AND EMPLOYEE FEEDBACK

Gallagher welcomes feedback on how client and employee expectations are being met and potentially how they can be improved on regarding the use of our services. We recognize that people with disabilities may use different methods of communication and clients who wish to provide feedback on our policies and practices may do

Feedback is encourage through the following formats:

Our web site: Use the contact us section of the web site to forward any inquires or accommodation requests

By mail: Compliance Officer
Arthur J Gallagher Canada
181 University Avenue, Suite 1200
Toronto, Ontario
M5H 3M7

By email: Canada.compliance@aig.com

Client, potential client, employee or applicant feedback should include the following:

- Time and date of event
- Feedback concerning event
- Service be accessed
- Personnel involved
- Accommodation request
- Additional comments
- Voluntary inclusion of contact information

Feedback will be reviewed and appropriate action, if applicable, will be taken.