



***Multi-Year Accessibility Plan  
(Ontario Locations)***

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## Overview

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In 2005, the Ontario Government passed the Accessibility for Ontarians with Disabilities Act (referred to as **AODA** hereafter) to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations (referred to **IASR** hereafter) have been created as part of this Act. These 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 Regulations divide organizations into five categories, each with their own corresponding requirements and compliance timelines.

**Princeton Holdings Limited** (referred to as “**PHL**” hereafter), has operating companies (Cowan Insurance Group Ltd, The Williamson Group Inc., Frank Cowan Company Limited and The Guarantee Company of North America) that fall under the category of "large organizations (private and not-for-profit) with 50+ employees" and will make every reasonable effort to ensure that their policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity. For the balance of this document, “the Company” will refer to it’s Operating Companies with more than 50 employees.

This document, entitled ***Multi-Year Accessibility Plan for Ontario Locations***, outlines the Company’s strategy to prevent and remove barriers to address the current and future requirements of the AODA. It also fulfills our disclosure commitment as outlined in the Company’s Accessibility Policies.

Under the AODA and the IASR, the following accessibility standards set certain requirements that are applicable to the Company:

- Part One: General requirements concerning Customer Service - Sections 3, 4, 7 and 8
- Part Two: Information and Communications - Sections 11, 12, and 14
- Part Three : Employment Standards - Sections 22-32

Accordingly, the Company has committed to:

- Post this plan on its website ([www.princetonholdings.ca](http://www.princetonholdings.ca));
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years, or earlier as required.

## Part One: General Requirements

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### Commitment

The Company will establish policies about how it will meet its obligations under the IASR that are consistent with the principles of dignity, independence, integration and equal opportunity.

### Establishment of Accessibility Policies and Practices

#### Part One – Section 3

##### Status: Completed

The Company has implemented an Accessible Customer Service Policy which governs how the organization achieves and sustains accessibility and highlights the organization's statement of commitment to meet the accessibility needs of persons with disabilities:

- Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the Company;
- Customers who are accompanied by a support person, guide dog, or other service animal will be accommodated;
- A public notice will be issued in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities. The notice will include the reason for the disruption, the anticipated duration, and a description of alternative facilities or services, if any, that may be available; and
- the Company will continue to welcome and appreciate feedback from persons with disabilities through multiple communication methods.

### Establishment of a Multi-Year Accessibility Plan

#### Part One – Section 4

##### Status: Completed

The Company has established, implemented, and will maintain a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers:

- This accessibility plan has been posted on our website and can be provided in an accessible format upon request; and
- The accessibility plan will be reviewed and updated as required.

## Development and Implementation of Training

### Part One – Section 7

#### **Status: Completed**

The Company has implemented a process to ensure that employees, as well as people participating in the development and approval of the Company's policies, are trained on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities:

- All current employees receive training and will participate in mandatory refresher training every 2 years going forward;
- All new employees receive training within the first week of hire; and
- All training records are maintained electronically.

## Part Two – Information and Communications Standards Requirements

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### Commitment

The Company is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making applicable company information and communications accessible to persons with disabilities.

### Feedback

#### Part Two – Section 11

##### Status: Completed

The Company shall provide a vehicle to provide feedback on the service received by customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available on our 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;
- Customers who wish to provide feedback by completing an onsite customer feedback form, by email, or verbally may do so; and
- Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on the concerns or complaints that were submitted.

### Accessible formats and communication supports

#### Part Two – Section 12

##### Status: Completed

The Company will provide information and communicate in an accessible manner about our goods, services or facilities to people with disabilities, on request, as addressed in our policy:

- The Company will ensure that feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request;



- Except as otherwise provided for under the IASR, the Company will provide or arrange for the provision of accessible formats and communication supports upon request for persons with disabilities that takes into account the person's accessibility needs; and
- Consult with the person making the request in determining the suitability of an accessible format or communication support.

## **Accessible Website and Web Content**

### **Part Two – Section 14**

#### **Status: In progress**

In accordance with the IASR, the Company will ensure that its public websites and online content conform to the World Wide Web Consortium Web Content Accessibility Guidelines:

- January 1, 2014 – WCAG 2.0 Level A – new Internet websites and web content

#### **Status: Completed**

- January 1, 2021 – WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR.

#### **Status: In progress**

## Part Three: Employment Standards Requirements

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### **Commitment:**

The Employment Standard, under the Integrated Accessibility Standards Regulation, requires employers to provide for accessibility across all stages of the employment life cycle. The Company is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making the recruitment process accessible to persons with disabilities.

### **Recruitment General**

#### **Part Three – Section 22**

##### **Status: Completed**

The Company will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures, processes and templates; and
- Specifying on the Company's website and on job postings that accommodation is available for applicants with disabilities.

### **Recruitment, Assessment and Selection**

#### **Part Three – Section 23**

##### **Status: Completed**

The Company will notify job applicants individually selected to participate in an assessment or the selection process that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will be done as follows:

- A review and, as necessary, modification of existing recruitment policies, procedures, processes and templates;
- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and

- If a selected applicant requests an accommodation, we will arrange for the provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

## **Notice to Successful Applicants**

### **Part Three – Section 24**

#### **Status: Completed**

When making offers of employment, the Company will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures, processes and templates; and
- Including notification of the Company's policies on accommodating employees with disabilities in offer of employment letters.

## **Informing Employees of Supports and Accessible Formats**

### **Part Three – Sections 25 and 26**

#### **Status: Completed**

In accordance with the IASR, the Company will:

- Inform 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;
- Provide the information required to new employees as soon as practical after they begin their employment with the Company;
- 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; and
- Where an employee with a disability requests it, provide or arrange for the provision of accessible formats and communication supports for:
  - Information that is needed in order to perform the employee's job;
  - Information that is generally available to employees in the workplace.

the Company will consult with the employee making the request in determining the suitability of an accessible format or communication support.

## **Workplace Emergency Response Information**

### **Part Three – Section 27**

#### **ReqStatus: Completed**

- Where the organization becomes aware of the need to accommodate an employee's disability, and if the employee's disability is such that individualized emergency response information is necessary, the Company will provide individualized workplace emergency response information to the employee with the disability as soon as practical after the Company becomes aware of the need;
- If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent, the Company will provide the workplace emergency response information to the person designated by the organization to provide assistance to the employee; and
- The Company will review the individualized workplace emergency response information when:
  - the employee moves to a different location in the organization;
  - the employee's overall accommodations needs or plans are reviewed; and/or
  - the Company reviews its general emergency response policies.

## **Documented Individual Accommodation Plans**

### **Part Three – Section 28**

#### **Status: Completed**

- The Company's existing policies will be reviewed to include processes that the Company will follow to accommodate an employee with a disability;
- The Company will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required; as follows:
  - If requested, include any information regarding accessible formats and communications supports provided, as required in the Standard;

- If required, include individualized workplace emergency response information, as required in the Standard; and
- Identify any other accommodation that is to be provided.

## **Return to Work Process**

### **Part Three – Section 29**

#### **Status: Completed**

- The Company will ensure that the return to work process, as set out in its existing policies, outlines the steps the Company will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process; and
- Return to work plans may be facilitated through the existing graduated return to work plans.

## **Performance Management, Career Development and Redeployment**

### **Part Three – Sections 30-32**

#### **Status: Completed**

In accordance with the IASR, the Company will:

- Review, assess and, as necessary, modify existing policies, procedures, practices and templates to ensure compliance with the IASR;
- Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - Assessing performance: Review an 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, such as large print for individuals with low vision.
- Managing career development and advancement: Provide informal and formal coaching and feedback in a manner that takes into account an employee's disability, such as using plain language for an individual with a learning disability.

- Redeployment is required

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**If you have questions or comments please contact [hr@princetonholdings.com](mailto:hr@princetonholdings.com).**

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