



Accessibility for Ontarians with Disabilities Act (AODA)

Integrated Standards Policy and Procedure

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ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA)

The Accessibility for Ontarians with Disabilities Act, 2005 ("the AODA") is a Provincial Act with the purpose of developing, implementing and mandating accessibility standards to achieve accessibility for persons with disabilities, with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises.

SIGMA LOYALTY GROUP'S STATEMENT OF COMMITMENT

Sigma Loyalty Group is committed to providing a respectful, welcoming, accessible, and inclusive environment for all persons with disabilities in a way that is respectful of the dignity and independence of people with disabilities and in a manner which takes into account the person's disability while embodying the principles of integration and equal opportunity.

Sigma Loyalty Group is committed to being a barrier free environment by meeting the requirements of existing legislation and its own policies related to identifying, removing and preventing barriers to people with disabilities.

Sigma Loyalty Group ensures that all persons within its business are aware of their rights and responsibilities to foster an accessible and inclusive environment with and for persons with disabilities.

Sigma Loyalty Group is committed to, and will strive to ensure that, the Accessibility for Ontarians with Disabilities Act (AODA), 2005, its regulations, standards and all other relevant legislation concerning accessibility, are rigorously observed in a timely fashion.

SCOPE

1. This policy applies to the provision of goods and services owned and/or operated by Sigma Loyalty Group via telephone, video, face-to-face, email, SMS, websites, mobile apps, or written mail
2. This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of Sigma Loyalty Group.

ACCOUNTABILITIES AND RESPONSIBILITIES

Sigma Loyalty Group Senior Management is accountable to and responsible for:

- The governance of the policy.
- Support and promote the policy in their area of direct report and throughout the organization.
- Drive the culture to a high level of understanding regarding disability and accommodation.

Sigma Loyalty Group Managers and Team Leaders are accountable to and responsible for:

- Fostering open and constructive communication.
- Demonstrating sensitivity to and respect confidentiality of information.
- Raising awareness to facilitate understanding of the policy.
- Participating and co-operating to facilitate workplace accommodation.

Sigma Loyalty Group Employees are accountable to and responsible for:

- Being aware of their responsibilities related to this policy
- Participating and cooperating with all parties to facilitate this policy

Sigma Loyalty Group Human Resources is accountable to and responsible for:

- Participating and cooperating with all parties.
- Acting as a resource for all parties and participants.
- Supporting and educating managers in their obligations.

GENERAL DEFINITIONS

Accessible Formats: include, but are not limited to accessible electronic formats, Braille, text transcripts, large print, recorded audio, and other formats accessible to persons with disabilities.

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

Barrier: as defined by the Ontarians with Disabilities Act, 2001, anything that prevents a person with a disability from fully participating in all aspects of society because of their disability. This includes:

- a physical barrier,
- an architectural barrier,
- an informational or communications barrier,
- an attitudinal barrier,
- a policy, practice and procedure barrier.

Communication Supports: include but are not limited to sign language, plain language and other communication tools that facilitate effective communications.

Disability: as defined by the AODA and the Ontario Human Rights Code [1]: “A disability may be the result of combinations of impairments and environmental barriers, such as attitudinal barriers, inaccessible information, an inaccessible built environment or other barriers that affect people’s full participation in society.” [2]

The [AODA](#) also states that disability can happen at birth, or through illness or injury. Furthermore, the act also outlines several types of disability.

The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.

INTEGRATED ACCESSIBILITY STANDARDS REGULATION POLICY

PURPOSE AND BACKGROUND

The Integrated Accessibility Standards Regulation (Regulation 191/11) (the "IASR") under the AODA provides standards for private sector organizations to increase accessibility for persons with disabilities specifically in the areas of:

- Information and Communications
 - Our commitment is detailed within the Accessibility Standards for Customer Service: Sigma Loyalty Group Accessible Customer Service Principles.
- Employment
 - Sigma Loyalty Group is committed to a diverse workforce and complies with all the relevant and applicable provisions of the Human Rights Legislation and Accessibility for Ontarians with Disabilities Act (AODA).
 - Sigma Loyalty Group is committed to providing employees or applicants with disabilities with reasonable accommodations that value diversity in our culture and business practices, focus on individual needs and provide working conditions inclusive of the needs of a diverse workforce.

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE POLICY

PURPOSE AND BACKGROUND

The AODA, Ontario Regulation 429/07, entitled "Accessibility Standards for Customer Service" (the "Service Regulation"), establishes accessibility standards specific to customer service for private sector organizations that provide goods and services to members of the public or other third parties.

The objective of this policy is to identify what the equal treatment provisions of the Ontario Human Rights Code, through the AODA and the Service Regulation, require with respect to service delivery to persons with disabilities and addresses the following:

- The Provision of Goods and Services to Persons with Disabilities;
- The Use of Assistive Devices;
- The Use of Guide Dogs and Service Animals;
- Allergies;
- The Use of Support Persons;
- Notice of Service Disruptions;
- Customer Feedback;
- Training; and
- Notice of Availability and Format of Required Documents.

SIGMA LOYALTY GROUP ACCESSIBLE CUSTOMER SERVICE PRINCIPLES

Dignity: The principle of respecting the dignity of a person with a disability means treating them as customers and clients who are as valued and as deserving of high quality and timely service as any other customer. Persons with disabilities are not treated as an afterthought or forced to accept lesser service, quality or convenience. The delivery of goods and services must take into account how persons with disabilities can effectively access and use them.

Independence: In some instances, independence means freedom from control or influence of others -- freedom to make one's own choices. In other situations, it may mean the freedom to do things in one's own way. People who may move or speak more slowly or differently must not be denied an opportunity to participate in a program or service because of this. Staff must allow persons with disabilities to take the time they need, without rushing them or taking over a task for them if someone prefers to do it themselves in their own way.

Integration: The provision of goods or services to persons with disabilities and others must be integrated to allow persons with disabilities to fully benefit from the same services, in the same place and in the same or similar way to other customers. Integration means that policies, programs and services including practices and procedures are designed to be accessible to everyone, including persons with disabilities.

Equal Opportunity: Equal opportunity means having the same chances, options, benefits and results as others. In the case of services, it means that persons with disabilities have the same opportunity as others to obtain, use and benefit from the way goods or services are provided. They should not have to make significantly more effort to access or obtain services. They should also not have to accept lesser quality or more inconvenience.

THE PROVISION OF GOODS AND SERVICES TO PERSONS WITH DISABILITIES

Sigma Loyalty Group is committed to excellence in serving all customers, clients, and employees including persons with disabilities, and will carry out its functions and responsibilities to ensure that policies, practices and procedures are consistent with the following principles:

- ensuring that all parties receive the same value and quality;
- allowing persons with disabilities to do things in their own ways, at their own pace, without causing risk to safety of themselves or others, when accessing goods and services;
- using alternative methods when possible, to ensure that persons 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 person's disability.

COMMUNICATIONS AND LANGUAGE

Sigma Loyalty Group employees and representatives will be encouraged to be proactive in seeking solutions and removing barriers, as well as alerting all customers to the range of accommodation that is available.

The term "persons with disabilities" will be the norm, and if a specific condition must be referenced, the condition will be referenced last (e.g., person with low vision). The following are some general tips that may help make communication and interaction with or about people with all types of disabilities more successful:

- Remember to put people first. It is proper to say person with a disability, rather than disabled person or the disabled.
- It is best to wait until an individual describes his or her situation to you, rather than to make your own assumptions. Many types of disabilities have similar characteristics and assumptions may be wrong.

ASSISTIVE DEVICES

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Sigma Loyalty Group. In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services.

Every employee who interacts with customers/clients or other third parties will be trained in how to assist with various assistive devices, should their assistance be required.

GUIDE DOGS AND SERVICE ANIMALS

A customer with a disability that is accompanied by a guide dog or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act 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. If a guide dog or service animal is excluded by law, Sigma Loyalty Group will try to offer alternative methods to enable the person with a disability to access goods and services, when possible.

Recognizing a Guide Dog and/or Service Animal: If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Sigma Loyalty Group 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: The customer/client that is accompanied by a guide dog or service

animal is responsible for maintaining care and control of the animal at all time.

Employees will be prepared to respond to requests of water for the service animal and to show the owner an outdoor area where the animal can be taken to relieve itself.

ALLERGIES

If a health and safety concern presents itself, for example in the form of a severe allergy to the animal, Sigma Loyalty Group will make all reasonable efforts to meet the needs of all individuals.

SUPPORT PERSONS

If a customer/client with a disability is accompanied by a support person, Sigma Loyalty Group will ensure that both persons are allowed to enter the premises together and that the customer/client is not prevented from having access to the support person. All customer/client confidentiality requirements and practices will also apply to support persons.

TRAINING

Training is provided to all employees to ensure an understanding of current and/or newly revised provincial legislation and Sigma Loyalty Group's policy, practice and procedures.

NOTICE OF DISRUPTIONS IN SERVICE

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Sigma Loyalty Group. In the event of any temporary disruptions to facilities or services that persons with disabilities rely on to access or use, 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.

FEEDBACK PROCESS

Sigma Loyalty Group provides the opportunity to give feedback on the service provided to persons with disabilities through contacting our Human Resources. Customers can submit feedback to: hr@sigmaloyaltygroup.com. Alternate methods of providing feedback such as verbally (by telephone) or written (handwritten or email) will be available upon request.

Sigma Loyalty Group will acknowledge feedback within five business days, In some cases, it may not be possible or appropriate to acknowledge feedback, for example, if the customer wishes to remain anonymous, or indicates that he/she does not want to receive an acknowledgment.

AVAILABILITY AND FORMAT OF DOCUMENTS (ALTERNATIVE FORMATS)

All documents required by the Accessibility Standards for Customer Service, including Sigma Loyalty Group's Accessibility Policy, notices of temporary disruptions, and written feedback processes are available upon request, subject to the Freedom of Information and Protection of Privacy Act ("FIPPA").

When providing these documents to a person with a disability, Sigma Loyalty Group will endeavour to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

ADMINISTRATION

If you have any questions or concerns about this policy or its related procedures and for available formats, please contact: hr@sigmaloyaltygroup.com

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

[2] [Ontario Human Rights Code](#)