

## **AODA: Accessible Customer Service Policy**

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is Provincial Legislation with the purpose of developing, implementing and enforcing accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025.

This document is consistent with the *Accessibility Standards for Customer Service* (Customer Service Standard) made under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*, O. Reg. 429/07 and O. Reg. 191/11, as amended and addresses the following:

- the provision of goods and services to persons with disabilities
- the use of assistive devices by persons with disabilities
- the use of service animals by persons with disabilities
- the use of support persons by persons with disabilities
- notice of temporary disruptions in services and facilities
- staff training
- client feedback regarding the provision of goods and services to persons with disabilities
- notice of availability and format of documents and meetings

This policy applies to Firm services that are provided externally to the public or third parties.

The policy applies to all lawyers, paralegals and staff at the Firm, agents, volunteers, clients, and visitors to the Firm.

### **1. Purpose and Commitment**

Sullivan Mahoney LLP (“Firm”) is committed to maintaining an accessible environment for persons with disabilities in the delivery of its goods and services.

The Firm will use reasonable efforts to ensure that its policies, practices and procedures governing the provisions of its services to persons with disabilities are consistent with the following principles:

- goods and services are provided in a way that respects the dignity and independence, integration and equal opportunity of persons with disabilities;
- persons with disabilities are able to benefit from the same services, in the same place and in a similar way as other clients;
- persons with disabilities have opportunities equal to others to obtain, use and benefit from the Firm’s goods or services.

### **2. Definitions**

For the purpose of this policy:

**“Disability”** means,

- a) 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 coordination, blindness and 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,
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

**“Accessible”** means capable of being entered or reached, approachable; easy to get at; capable of being influenced; obtainable; able to be understood or appreciated.

**“Dignity”** means respecting and treating every person including persons with a disability as valued and as deserving of effective and full service as any other client.

**“Independence”** means freedom from control or influence of others, freedom to make your own choices.

**“Service animal”** means an animal for a person with disabilities where it is readily apparent that the animal is used by the person for reasons relating to his or her disability or where the person provides a letter from a physician or nurse confirming that he or she requires the animal for reasons relating to the disability.

**“Support person”** means, in relation to a person with disabilities, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods and services.

### **3. Providing Goods and Services to Persons with Disabilities**

The Firm is committed to excellence in serving all clients, including persons with disabilities, and will carry out its functions and responsibilities by,

- communicating with persons with disabilities in ways that take into account their disability.
- customers with disabilities may use their personal assistive devices on the Firm’s premises and use any other measures the Firm offers to help them access the Firm’s goods and services
- ensuring that persons with disabilities who are accompanied by service animals are permitted to enter the premises of the Firm with the animal and to keep the animal with them, unless the animal is excluded by law from the premises. If the animal is excluded by law, the Firm will have another method to provide services.
- ensuring that persons with disabilities who are accompanied by a support person are permitted to enter the Firm’s premises with their support person. A support person can be a personal support worker, a volunteer, a family member or a friend. At no time will persons with disabilities who are accompanied by their support person be prevented from having access to their support person while on the Firm premises.

- ensuring that the needs of persons with disabilities are considered when constructing or renovating public areas and procuring new point-of-sale and other devices.

#### **4. Notice of Temporary Disruption**

The Firm will notify the public in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will be posted in a conspicuous place on the Firm's premises, on the website or another reasonable method. The notice shall include information about the reason for disruption, its anticipated duration, and a description of alternative facilities or service, if available.

#### **5. Maintenance of Accessible Elements**

The Firm will consider the needs of persons with disabilities when scheduling and completing all preventative and emergency maintenance of accessible elements in public spaces.

The Firm will schedule such maintenance in a manner that is as minimally disruptive as is reasonable, and will have consideration of any challenges such maintenance poses to persons with disabilities and take reasonable steps to minimize such challenges.

#### **6. Training for Staff**

The Firm will train its staff, all individuals who participate in developing the Firm's policies, and other individuals who provide services to the public on the Firm's behalf on the provision of its goods or services to persons with disabilities.

The training will be provided as soon as practicable after commencing employment and will include the following topics:

- the purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard;
- how to interact and communicate with persons with various types of disabilities;
- how to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- how to use or access equipment or devices available on the Firm's premises or otherwise that may help with the provision of goods or services to persons with disabilities;
- what to do if a person with a particular type of disability is having difficulty in accessing the Firm's goods and services;
- the Firm's policies, practices and procedures relating to the customer service standard.

The Firm will provide training on an ongoing basis when changes are made to the Firm's policies, practices and procedures governing the provision of goods and services to persons with disabilities.

#### **7. Accessibility Reports**

The Firm files Accessibility Compliance Reports annually as part of its requirements under the AODA. The Firm will provide a copy of any such report, upon request, to any person.

## **8. Feedback Process**

The Firm welcomes any feedback regarding the methods it uses to provide good and services to persons with disabilities. Individuals may provide their feedback in person, by telephone, in writing, or by email to:

Darlene Inglis.  
Office Administrator,  
Sullivan Mahoney LLP  
40 Queen Street, P.O. Box 1360  
St. Catharines, ON L2R 6Z2  
Direct Line: 905-688-6843  
Email: [dinglis@sullivanmahoney.com](mailto:dinglis@sullivanmahoney.com)

Feedback will be reviewed and assessed in order to improve client service. Individuals can expect a response with a reasonable time from providing feedback. Feedback will be provided in the format in which it was received. The feedback may outline actions deemed appropriate, if necessary.

## **9. Modification to This or Other Policies**

The Firm is responsible for reviewing this policy annually and recommending amendments to ensure ongoing compliance with regulated accessibility standards and legislated obligations. Changes will not be made to this policy unless the impact of the changes on persons with disabilities has been considered.

Any Firm policy that does not respect and promote the dignity and independence of persons with disabilities will be modified or removed.

## **10. Maintenance of Documents**

The Firm will maintain the policies and procedures contained in this document and, upon request, shall give a copy of this document to any person. This document includes policies, practices and procedures with respect to the following:

- use of support persons;
- use of service animals;
- the steps to be taken in connection with a temporary disruption;
- the training policy, including a summary of the contents of the training and details of when the training is to be provided;
- records of the training provided under this policy, including the dates on which the training is provided and the number of individuals to whom it is provided;
- the feedback process.

The Firm will notify persons to whom it provides goods and services of its policies, by posting the information at a conspicuous place on the Firm's premises, on the Firm website or by such method as is reasonable in the circumstances.

When required under this policy to give a copy of a document to a person with a disability, the Firm will provide the document or information in a format that takes into account the person's disabilities.