

## POLICY ON THE *INTEGRATED ACCESSIBILITY STANDARDS*

### BACKGROUND

Shibley Righton LLP (the “**Firm**”) is committed to the objectives underlying the *Accessibility for Ontarians with Disabilities Act, 2005* (the “**AODA**”), including the *Integrated Accessibility Standards*, being Regulation 191/11 made under the AODA (the “**Standards**”).

In compliance with the AODA, the Firm has developed this Policy on the *Integrated Accessibility Standards* (the “**Accessibility Policy**”) and a Multi-Year Accessibility Plan (the “**Plan**”).

Everyone within the Firm is expected to uphold this Accessibility Policy and the Plan and to work together to provide accessible client service for persons with disabilities. Everyone associated with the Firm, including but not limited to all lawyers, staff, employees, volunteers, and third party individuals and entities who deal with the public on the Firm’s behalf are bound by this Policy and procedures in this document. These individuals and entities are hereafter referred to as “**Service Providers**”.

### CUSTOMER SERVICE

The Firm is committed to providing accessible client services to persons with disabilities and is committed to aligning the Firm’s client service policies, practices and procedures with the core principles of independence, dignity, integration, equality of opportunity.

1. The *principle of independence* means that clients with disabilities should have the opportunity to choose and not to be influenced, aided or controlled by others. Clients should be allowed to do things on their own without interference from others, unless the client requests assistance.
2. The *principle of dignity* means that all policies, practices or procedures should not exclude persons with disabilities from accessing the Firm’s services. All clients, including those with disabilities, are to be respected, valued, and treated equally.
3. The *principle of integration* means that clients with disabilities shall be integrated with the provision of services, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable the client to obtain the benefit from the same services, in the same or similar manner, and in the same place as other clients.
4. The *principle of equal opportunity* means that clients with disabilities should have the same opportunity to benefit fully from accessing our Firm’s services.

### Communication

Communication is an integral part of the Firm’s client service commitment. The Firm is dedicated to following the *principle of communication*, which means that clients with disabilities should receive communications from our Firm with respect to services in a manner that takes into account

their disability. The Firm is dedicated to making all reasonable efforts to take into account its clients' disabilities when communicating with them. The Firm clearly understands that communication styles vary and that not all persons with the same disability use the same communication modalities. The Firm shall make every reasonable effort to ensure that its Service Providers take this into consideration and, when not sure, always ask our clients how best to communicate with them.

The Firm has committed to training its Service Providers on the various communication styles and how best to interact with all of our clients with all types of disabilities.

The Firm has made the necessary changes to ensure that our clients are aware that they may communicate with us in any reasonable modality when accessing our services.

The Firm is committed to providing communications, invoices and accounts for services rendered in any accessible format that the client may reasonably request, including, for example, hard copy, large print, e-mail, etc. The Firm will answer any questions our clients may have about the contents of our invoices in person, by telephone, email, or such other accessible format as they client may reasonably request.

### **Assistive Devices**

The Firm is committed to providing accessible services to clients who may use assistive devices. Clients shall have unencumbered access to the assistive devices they bring with them for the purposes of accessing Firm services.

Service Providers shall not operate or otherwise interfere with a person's personal assistive device unless invited to do so by the person or his/her support person.

The Firm shall provide ongoing training to our Service Providers to ensure that they are familiar with the various types of assistive devices that may be used by persons with disabilities when accessing our services.

### **Service Animals and Support Persons**

In accordance with section 80.47 of the *Standards*, the Firm is committed to ensuring that all clients who are accompanied by service animals or support persons are able to access all parts of our premises that are open to the public.

Subsection 80.45(4) of the *Standards* states that an animal is a service animal if (a) the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or (b) the person provides documentation from one of the enumerated regulated health professionals confirming that the person requires the animal for reasons relating to the disability.

A person with a disability is permitted to enter Firm premises with a service animal unless the animal is specifically excluded by law. In the rare event that a service animal is not allowed into certain sections of our premises, the Firm will ensure that this information is communicated to our clients and that alternative appropriate measures are provided to enable the client with the

disability to obtain, use or benefit from the good and/or services, using due sensitivity and diligence.

Subsection 80.45(3) of the *Standards* states that a support person is another person who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

If a person with a disability is accompanied by a support person, the Firm shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the Firm's premises.

In some instances, if, after consulting with a person with a disability and considering the available evidence, the Firm determines that (a) a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises, or (b) there is no other reasonable way to protect same, the Firm may require that person with a disability to be accompanied on the Firm's premises by a support person.

### **Service Disruptions**

As part of the Firm's commitment to accessible client service, the Firm will provide accessible notice in the case of a planned or unexpected service disruption to any of its facilities or services that are accessed by its clients.

In accordance with section 80.48 of the *Standards*, the notice will include the reason(s) for the disruption, its anticipated duration, and a description of the alternative facilities or services that may be available during the disruption. This information will be made available in a conspicuous location, such as in the Firm's reception area, and on its website where appropriate, and in any other reasonable manner to ensure it is accessible to clients.

When the disruption is planned, advance notice will be given to clients.

The Firm's emergency Service Providers are familiar with emergency procedures, and will know the best and most appropriate ways to assist clients or staff who need assistance during an emergency.

### **Training**

To make certain that the provision of our services remains accessible to clients with disabilities, the Firm provides training to all of its Service Providers and to those responsible within our Firm for the development of our customer service policies, practices and procedures.

In accordance with section 80.49 of the *Standards*, the training includes the following information:

- (a) a review of the purpose and provisions of the AODA and the *Standards*;
- (b) how Service Providers should best interact and communicate with persons with various types of disabilities;

- (c) how Service Providers should best interact and communicate with persons with disabilities who use assistive devices or are accompanied by support persons, service animals, or guide dogs;
- (d) how Service Providers should best use assistive devices or equipment available on Firm premises or otherwise provided by the Firm that may help with the provision of services to a person with a disability;
- (e) what to do if a person with a particular type of disability is having difficulty accessing the Firm's services; and
- (f) the requirements under the *Human Rights Code* as it pertains to persons with disabilities.

The Firm understands that appropriate and ongoing training is a key component in ensuring that the Firm continues to provide accessible client service. Accordingly, the Firm requires all new employees and Service Providers to complete the appropriate training as soon as practicable after commencing their employment. Moreover, the Firm shall provide ongoing training in connection with any changes to our policies, practices and procedures governing the provision of services to persons with disabilities.

The Director, Human Resources & Administration will maintain written training records, that include the date training was provided, the type of training, and the name of trainees.

The Firm's training policy document is available upon request.

### **Client Service Feedback**

As part of the Firm's commitment to accessible client services, the Firm welcomes the opportunity to receive and respond to feedback concerning (a) the manner in which it provides services to persons with disabilities, and (b) whether the feedback process established by the Firm is accessible and offers proper communication supports. In order to ensure our process is accessible, we welcome feedback through any of the following methods: in person (upon making an appointment), in writing, telephone, TTY, e-mail, or using our feedback forms posted on our Firm's website.

The Firm is committed to responding to any complaints, questions or other feedback concerning the accessibility of its client service as soon as possible following receipt of same. Unless otherwise requested by the client or person providing the feedback, the Firm may not respond using the same method of communication by which the feedback was received.

## **EMPLOYMENT**

As part of the Firm's commitment to the *Standard* of Employment under the AODA, the Firm will notify its employees and the public about the availability of accommodation for applicants with disabilities during any job recruitment process. During any such recruitment process, the Firm shall

notify all applications upon being individually selected to participate in any interview, assessment or selection process, that accommodations are available upon request in relation to materials or processes being used. If such a request is made, the Firm will consult with the person to provide and/or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs.

Upon notification to an applicant of a successful application or when making offers of employment, the Firm shall notify the persons of the Accessibility Policy and other policies and procedures for accommodating employees with disabilities. All employees shall be notified by the Firm of the policies used to support employees with disabilities, including the procedures for the provision of job accommodations. This information will be provided to every new employee as soon as practicable and any updates on any policies and procedures will be provided to all employees of the Firm.

Upon request, the Firm will consult with an employee to provide and/or arrange for the provision of accessible formats and communication supports for any information that is needed to perform the employee's job and information that is generally available to employees in the workplace. The suitability of an accessible format or communication support will be determined in consultation with the employee making the request.

The Firm also has a *Human Rights and Workplace Accommodation Policy* that incorporates all the obligations contained in the *Standards*, including the development and use of Individual Accommodation Plans.

When conducting any performance management, career development or redeployment processes, the Firm will ensure that any accessibility needs of employees with disabilities are taken into account. A review of any Individual Accommodation Plans in place for the employee will be taken into consideration.

## **DESIGN OF PUBLIC SPACES**

The Firm is committed to ensuring that all newly constructed or renovated public spaces, which may include waiting areas, fixed queuing guides and/or service counters, meet all requirements under accessibility laws.

In the event of any service disruptions to any of the accessible parts of the Firm's public spaces, the Firm will regularly inspect the accessible portions and take steps necessary to correct any deficiencies within a reasonable time. If there is a service disruption, the Firm will notify the public of same and any alternatives available.

## **INFORMATION AND COMMUNICATION**

In addition to the adherence of the principle of communication outlined above and the Firm's process for Client Service Feedback, the Firm is committed to meeting the communication needs of persons with disabilities.

This Accessibility Policy will be made available upon request and within a reasonable time-frame once requested. The Firm will consult with the person making the request to determine the suitability of an alternative format, as necessary, which takes into account the requester's

accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons.

The Firm's website and all content posted since January 1, 2021, also conforms with the Web Content Accessibility Guidelines (WCAG) 2.0, Level AA.

### **OTHER**

This Policy shall be reviewed by the Firm at least annually and revised as may be necessary from time to time.

Any questions or concerns regarding this Policy or the Firm's provision of accessible client service may be directed to the Firm's Director, Human Resources & Administration:

by email: [admin@shibleyrighton.com](mailto:admin@shibleyrighton.com)

by telephone: (416)-214-5200 or 1-877-214-5200

by regular mail:

Shibley Righton LLP  
Attn: Director, Human Resources & Administration  
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