

## **Accessibility for Ontarians with Disabilities Act (AODA) Policy**

This accessibility plan outlines the policies and procedures that McGovern Hurley LLP (hereafter referred to as MH) will put in place to improve opportunities for people with disabilities.

### **Statement of Commitment**

MH is committed to treating all people in a way that allows them to maintain their dignity and independence. MH is committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its regulations.

### **Assistive Devices**

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by MH. MH will ensure that our personnel are trained and familiar with various assistive devices that may be used by clients with disabilities while accessing our services.

### **Billing**

MH will provide accessible invoices to all clients. Invoices will be provided in alternative format upon request. We will answer any questions clients may have about the content of the invoice in person, by telephone and via support persons.

### **Service Animals**

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public.

### **Exclusion Guidelines:**

If a service animal is excluded by law, MH will explain why the service animal is prohibited and offer alternative methods to enable the person with a disability to access goods and services, when possible.

### **Recognizing a Service Animal:**

If it is not readily apparent that the animal is being used by the client for reasons relating to their disability, MH may request verification from the client. Verification may include a letter from a physician, nurse, audiologist, speech-pathologist, chiropractor, occupational therapist, optometrist, or mental health therapist confirming that the person requires the animal for reasons related to the disability.

### **Care and Control of the Animal:**

The client that is accompanied by a service animal is responsible for maintaining care and control of the animal at all times. MH is not required to provide care or food for the service animal. Employees should not distract, touch, or offer treats to the animal that is on official duty to provide assistance to their owner with a disability.

### **Support Persons**

People with disabilities who are accompanied by a support person are welcome on our premises. A person with a disability who is accompanied by a support person will be allowed to have that support person accompany him or her and shall be permitted to have access to his or her support person at all times.

In situations where confidential information might be discussed, consent will be obtained from the client, prior to any such conversation.

### **Notice of Temporary Disruption**

In the event of a planned or unexpected disruption to our services or facilities usually used by clients with disabilities, MH will notify clients promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

The notice will be posted on MH's website or social media page and, where appropriate, will be posted in an alternate location such as a main entrance and/or reception area.

### **Training**

MH will provide training to all personnel who deal with the public and/or other third parties who deal with the public on behalf of our Firm. Training will also be provided to any person who is involved in the development and approval of the Firm's policies, practices and procedures governing the provision of services to clients or third parties.

Training will be provided to new members of the Firm during their orientation period.

Training will include:

- An overview of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the client service standard and Integrated Accessibility Standard;
- MH's plan related to the client service standard and Integrated Accessibility Standard;
- The Human Rights Code as it pertains to persons with disabilities;
- 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 equipment or devices, where provided, available on-site or otherwise that may help with providing goods or services to persons with disabilities; and
- What to do if a person with a disability is having difficulty in accessing MH's services.

Members of the Firm will also be trained when changes are made to this policy.

Training records will be made and maintained in accordance with the requirements of the AODA.

### **Feedback**

The ultimate goal of MH is to meet and exceed client expectations while serving clients with disabilities. Clients or others who wish to provide feedback on the way MH provides services to persons with disabilities can provide feedback directly to the staff member from whom they received services. Alternatively, you may provide feedback directly by any of the following methods:

By telephone: 416-496-1234

By email: [jrhind@mcgovernhurley.com](mailto:jrhind@mcgovernhurley.com)

By regular mail: 251 Consumers Road, Suite 800, North York, Ontario, M2J 4R3

The manner in which feedback is provided to MH will be taken into consideration when responding to comments, including complaints.

This policy exists to achieve service excellence to clients with disabilities. Questions or feedback about this policy will be directed to Jennifer Rhind. Clients can expect to hear back from the Firm in

a timely manner and in a way that takes the nature of the disability into consideration of the person providing feedback. Any complaints about services provided to persons with disabilities will be addressed according to our Firm's regular complaint management procedure.

### **Modifications to This or Other Policies**

Any policy of MH that does not respect and promote the principles of dignity, independence, integration and equal opportunity of persons with disabilities will be modified or removed.

### **Availability of Documents**

Upon request, MH will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to their disability. MH will consult with the person making the request in determining the suitability of an accessible format or communication support.

### **Information and Communications**

MH is committed to meeting the communication needs of people with disabilities. When requested, we will consult with people with disabilities to determine their information and communication needs and will communicate with persons with disabilities in ways that take into account their disability. MH will train all personnel how to interact and communicate with people with various types of disabilities.

MH will ensure that all of its publicly available information is made accessible upon request. When a request for an accessible format or for communication supports is received, MH will:

- Consult with individuals making requests to determine their accessibility needs to determine a suitable format or support;
- Provide the requested information in a timely manner; and;
- Provide the information at regular cost (if any).

### Accessible Websites and Web Content

MH will take the following steps to ensure its internet websites and all content posted on those sites (since January 1, 2012) conform with WCAG 2.0, Level AA:

- Audit all websites and content for Level AA compliance;
- Implement the necessary changes to ensure the website and web content conforms to all applicable standards.

### Accessible Emergency Information

Upon request, MH will provide publicly available emergency information to clients in an accessible way.

### Multi-Year Accessibility Plan and Compliance Report

MH has established and implemented a multi-year accessibility plan which is available on the Company website. The purpose of this document is to outline the Company's strategy to prevent and remove barriers. This plan is reviewed and updated every five (5) years. Accessible format of the plan is available upon request.

MH will complete and submit Accessibility Compliance Reports as required by the Act.

### **Employment**

#### Recruitment

MH is committed to fair and accessible employment practices.

MH will include standard language to be included in all job postings, whether published publicly or internally, to notify our personnel and the public of our commitment to accommodate applicants with disabilities in the recruitment process.

MH will notify job applicants when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used. If the selected applicant requests an accommodation, MH will consult with the applicant and provide suitable accommodation in a manner that takes into account the applicant's accessibility needs due to a disability.

When making offers of employment, MH will notify the successful applicant of its policies for accommodating employees with disabilities.

#### Individualized Workplace Emergency Response Information

MH will provide individualized emergency response information to any personnel with a disability, if the disability is such that the individualized information is necessary and MH has been made aware that the accommodation is required due to the disability.

Individualized workplace emergency response information will be evaluated when the individual moves to a different location, when the overall accommodations needs or plans are reviewed, and when MH reviews its general emergency response policies.

#### Individual Accommodation Plan (IAP)

MH provides individual accommodation plans to employees who have a disability, upon request. Employees may make a request at any time during their employment.

Once the request has been made, management and Human Resources will work together with the employee to fill out the Individual Accommodation Plan Form and implement an IAP.

Once plans have been finalized, an annual review will be required to ensure effectiveness. Only members associated with the plan will receive information regarding the arrangement.

Any information that needs to be accessible for employees will be addressed in their IAP and provided upon request.

Both the Individualized Workplace Emergency Response Plan and the IAP will be updated when:

- The employee moves to a different department;
- The employee's overall accommodations needs or plans are reviews; and
- The employee moves to a different location within the company.

#### Return to Work

MH will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Review all existing accommodation and return-to-work policies and practices;
- Revise existing policies and practices to take into account all factors set out in the *Integrated Accessibility Standards*;

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

When undertaking any performance management, career development and redeployment processes, MH will ensure that the accessibility needs of all personnel with disabilities needs are

taken into account. This will include a review of any individual accommodation plans that are currently in place.

Where an individual identifies any accessibility barriers, MH will take steps to remove the barriers identified.

### **Design of Public Spaces**

MH will meet Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Due to the nature of our business, public spaces will typically include only service-related elements like service counters, fixed queuing lines and waiting areas.

MH will endeavour to prevent service disruptions to the accessible parts of its public spaces. To reduce the risk of service disruptions, MH will periodically inspect the accessible portions of its public spaces. When any deficiencies are noted that may impact accessibility, MH will take steps to correct the deficiency within a reasonable period of time.

In the event of a service disruption, we will notify the public of the service disruption and alternatives available.

MH will incorporate accessibility features when designing, procuring or acquiring self-service Kiosks.

### **For More Information**

For more information on this accessibility policy, or for a copy of this document in an accessible format, please contact the Firm by any of the following means:

By telephone: 416-496-1234

By email: [jrhind@mcgovernhurley.com](mailto:jrhind@mcgovernhurley.com)

By regular mail: 251 Consumers Road, Suite 800, North York, Ontario, M2J 4R3