



Crawford Chondon & Partners LLP and CCARW Management Inc.

Customer Service Accessibility Policy

(Accessibility for Ontarians with Disabilities Act, 2005)

Effective Date: as of 2017

Crawford Chondon & Partners LLP ("CCP") is an Ontario law firm, and CCARW Management Inc. ("CCARW") an Ontario management company, are committed to the delivery of excellent client service. We are aware of the importance of clearly- defined, uniformly-embraced values that guide the firm and the company in sustaining high quality and excellent service delivery as well as promoting a positive and equitable work environment.

Our firm values - respect, teamwork, commitment, client service and professional excellence - demonstrate that we not only encompass diversity, but how we do business.

CCP and CCARW are both committed to promoting an equitable and diversified environment for our clients and FIRM MEMBERS. In this regard, it is CCP and CCARW's policy to provide accessible customer service to Ontarians with disabilities in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA") and the Accessibility Standard for Customer Service promulgated under that legislation as Ontario Regulation 429/07 (the "Customer Service Standard").

SCOPE

- a) This policy applies to the provision of CCP and CCARW services that are provided externally to the public or third parties.
- b) This policy applies to all FIRM MEMBERS and/or contractors who deal with the public or third parties that act on behalf of either CCP or CCARW. All areas of the firm are responsible for providing accessibility to PERSONS WITH DISABILITIES.
- c) The section of this policy that addresses the use of SERVICE ANIMALS only applies to the provision of goods and services that take place at the premises of CCP.
- d) This policy will also apply to members of the firm who participate in the development of CCP policies, practices and procedures governing the provision of client service.

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Definitions

ASSISTIVE DEVICE: is a technical aid, communication device or other instrument that is used to maintain or enhance the functional abilities of people with disabilities. Personal assistive devices are typically devices that clients may bring with them including a wheelchair, walker or a personal oxygen tank. Assistive devices may assist a person's hearing, vision, communicating, moving, breathing, memory and/or reading.

CUSTOMER: a customer is generally anyone who accesses the goods and services of a firm. The *Customer Service Standards* provide that the standards apply to organizations that provide goods and services to "members of the public and other third parties". In the context of legal services, customers are typically referred to as "clients".

DISABILITY: the term DISABILITY as defined by the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA") and the *Ontario Human Rights Code*, refers to:

- 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 or 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;
- A condition of mental impairment or a developmental DISABILITY;
- A learning DISABILITY or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or DISABILITY for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

FIRM MEMBERS: means every person who deals with clients, members of the public or third parties of behalf of CCP or CCARW, whether the person does so as a partner, employee, agent, volunteer, consultant or otherwise.

GUIDE DOG: means a dog trained as a guide for a person who is blind or visually impaired.

PERSONS WITH DISABILITIES: individuals who have a DISABILITY as defined under the *Ontario Human Rights Code* (and above).

SERVICE ANIMALS: animals individually trained to do work or perform tasks for the benefit of a person with a DISABILITY.

SUPPORT PERSONS: persons, whether paid professional, volunteer, family member, or friend, a case worker or a social worker who accompany a person with a

DISABILITY in order to help with communications, personal care, mobility or medical needs, or with access to our services.

Objective

The objective of this document is to highlight the quality standards adopted by CCP and CCARW and identify principles and practices to ensure excellence in the delivery of client service in Ontario.

In order to sustain this level of service, CCP and CCARW are both committed to monitoring and regularly reviewing our customer service processes to enable us to continue to improve our service to our clients. To do this effectively, all FIRM MEMBERS are encouraged to contribute to this process.

CCP and CCARW have exercised due diligence in preparing a comprehensive audit of current policies, practices and procedures and amending these to reflect the requirements of the Customer Service Standard. This policy demonstrates our commitment to implement the provision of accessible customer service and share this with the public.

Introduction

In accordance with the Customer Service Standard, CCP and CCARW will ensure that all current and new FIRM MEMBERS, including full-time, part-time, temporary or others who provide services on behalf of CCP and CCARW are informed of our obligations under this provincial legislation. This policy has been prepared to outline what we are required to do in the provision of services to Ontarians with disabilities under the Customer Service Standard and what our clients may expect from us.

This policy is also intended to benefit all PERSONS WITH DISABILITIES, as defined in the Ontario *Human Rights Code*.

Policy

CCP and CCARW are committed to providing accessible customer service to Ontarians with disabilities, in accordance with the Customer Service Standard.

CCP and CCARW have used reasonable efforts to ensure all of our policies, practices and procedures adhere to the key principles of dignity, independence, integration (except when alternative measures are required to meet the needs of PERSONS WITH DISABILITIES) and equal opportunity for Ontarians with disabilities. Each of these is discussed as follows:

Dignity: CCP and CCARW are committed to delivering services in a manner that respects the dignity of our clients with disabilities. Our clients with disabilities are

valued and as deserving of high quality and timely services as any other clients. They can expect the same quality of service and will not be inconvenienced in accessing our services.

Independence: Our FIRM MEMBERS have been trained to know that people with disabilities should have the freedom and opportunity to access services on their own and should not be influenced by others in accessing services.

Integration: At CCP and CCARW, we are committed to creating an inclusive environment and ensuring our services are integrated. Our clients with disabilities have equal access to benefiting from the same services, in the same place and in the same manner or similar way, as do all of our clients. If a client with a DISABILITY requires alternative measures to access our services, our FIRM MEMBERS will make every effort to support the client in this regard.

Equal Opportunity: CCP and CCARW are committed to ensuring that our clients with disabilities have the same opportunities, options, benefits, and results from accessing our services. Our clients with disabilities do not have to make additional effort to access or obtain service.

Communication

CCP and CCARW are dedicated to ensuring that when we communicate with our clients with disabilities, we will take into account the person's DISABILITY. Communication is a process of providing, sending, receiving and understanding information and in this regard, our FIRM MEMBERS receive training on best practices when communicating with PERSONS WITH DISABILITIES. How our FIRM MEMBERS will make communication more accessible will depend on the situation and client needs.

Assistive Devices

At CCP and CCARW, our FIRM MEMBERS have been trained on best practices with respect to providing services to PERSONS WITH DISABILITIES who use personal ASSISTIVE DEVICES. Our clients are permitted to bring their personal ASSISTIVE DEVICES when accessing services and our FIRM MEMBERS recognize there is a wide range of devices that may be used.

While generally, we do not have ASSISTIVE DEVICES on our premises, CCP and CCARW are dedicated to supporting our clients in accessing services through the provision of other assistive measures. Our FIRM MEMBERS are trained to ensure that in the absence of ASSISTIVE DEVICES, our clients can expect that we will provide alternative service methods if necessary and if practical. These may include third service providers such as ASL interpreters or real-time captioning services that are requested in advance.

Service Animals

At CCP, we welcome our clients with disabilities who may be accompanied by a guide dog or other SERVICE ANIMALS in all areas of our premises that are open to the public.

Our FIRM MEMBERS receive training on best practices when providing services to persons who are accompanied by a SERVICE ANIMAL. Furthermore, in rare situations, where the other person's health and safety may be impacted by the presence of a service animal, our FIRM MEMBERS are trained to take into consideration all relevant factors and options in finding a solution.

Support Persons

Our FIRM MEMBERS are aware that, in some instances it is necessary for a person with a DISABILITY to be accompanied by a SUPPORT PERSON to protect the health and safety of the person with the DISABILITY and/or others on the premises. Any considerations about protecting the health and safety of both parties will be based on specific factors and not on assumptions. Our FIRM MEMBERS are trained to use best practices when providing services to persons who are accompanied by a SUPPORT PERSON(s).

A SUPPORT PERSON may be present when information is being exchanged between a lawyer/law clerk/legal assistant and the client. A SUPPORT PERSON may also contact the lawyer on the client's behalf, attend at meetings and assist the client in communicating with the lawyer.

At CCP, we will exercise due diligence in maintaining client confidentiality and will request permission from our clients prior to disclosing information in the presence of a SUPPORT PERSON.

Our FIRM does not charge fees for support persons or if fees are charged for admission to a FIRM event i.e., a seminar, the FIRM shall provide notice of the amount, if applicable in advance.

Notice of Temporary Disruption

CCP will provide clients with notice in the event of a planned or unexpected disruption in the facilities (as it relates to the space occupied by our firm) or services usually used by people with disabilities. Our clients may expect that our notices will provide, where practicable; information about: the reason for the disruption (provided such knowledge is available), the anticipated duration of the disruption; and alternative facilities or services, if any are available.

This information will be made available to the public as soon as possible after CCP has been notified of the unplanned disruption. For all planned disruptions, notices shall be provided in advance of the scheduled disruption.

When disruptions occur, CCP will provide notice by:

- Posting notices on the CCP website, depending on the situation.
- Contacting clients with scheduled appointments/meetings whenever possible.
- Any other method that may be reasonable under the circumstances.

Training of Firm Members on the *Accessibility for Ontarians with Disabilities Act*

CCP and CCARW are committed to ensuring that all FIRM MEMBERS receive training on providing customer service to Ontarians with disabilities. The training is given to everyone in our firm who deals with members of the public as well as to all of our administrators tasked with the governance of our policies, practices and procedures.

The training is designed to meet the compliance requirements of Customer Service Standard and includes information on the following key areas:

- A review of the purposes of the AODA and requirements of the Customer Service Standard;
- Instruction on how to interact and communicate with people with a variety of disabilities;
- Instruction on how to interact with persons who use ASSISTIVE DEVICES, or require the assistance of a guide dog, other SERVICE ANIMALS or SUPPORT PERSON;
- Instruction on how to use equipment or devices that may be available on our premises, as well as information on how to interact with persons who use a variety of assistive devices; and
- Instruction on what to do if a person with a DISABILITY is having difficulty accessing our services.

Training will be provided to all members of the Firm including partners, employees, students, and consultants. CCP and CCARW have incorporated this training requirement into firm hiring practices to ensure that all new FIRM MEMBERS complete the required Customer Service Standard training within a reasonable time of having accepted employment with CCP and CCARW.

CCP and CCARW are committed to maintaining a record of all FIRM MEMBERS who receive and complete the Customer Service Standard training. The records include the dates that training is provided, and the names of the individuals who received and completed training.

Feedback Process

CCP welcomes any feedback regarding the methods it uses to provide services to Ontarians with disabilities and is committed to ensuring that this process is accessible to all of our clients.

Feedback regarding CCP's provision of client service can be made by:

- Email: info@ccpartners.ca
- Telephone: 905-874-9343
- Written Feedback:

Crawford Chondon & Partners LLP
24 Queen Street East, Suite 500
Brampton, ON L6X 1A3

- Any other form of communication that takes into account the client's DISABILITY.

Clients will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

Modifications to this policy or other firm policies

CCP and CCARW are committed to developing client service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities.

Notice of Availability and Format of Documents

CCP will notify clients that the documents related to the Accessibility Standard for Customer Service are available upon request and in a format that takes into account the client's DISABILITY. The length of time it will take to provide information in alternative formats will depend on the format requested. Every effort will be made, however, to process requests in a timely fashion.

This notice and the policy will be posted on the firm's website.