

Macdonald Sager Manis LLP - Multi-year Accessibility Plan

Macdonald Sager Manis LLP will provide, on request, information in an accessible format or with communication supports to people with disabilities, in a manner that takes into account their disability.

INTRODUCTION AND STATEMENT OF COMMITMENT

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the “AODA”). It is the goal of the Ontario government to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations (“IASR”) under the AODA require that Macdonald Sager Manis LLP establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

Under the AODA, the following accessibility standards set certain requirements that are applicable to Macdonald Sager Manis LLP;

- Client Service;
- Information and Communications;
- Employment; and
- Accessibility Standards

This multi-year plan outlines the Macdonald Sager Manis LLP's strategy to prevent and remove barriers to address the current and future requirements of the AODA.

In accordance with the requirements set out in the IASR, the Macdonald Sager Manis LLP will:

- Establish, review and update this plan in consultation with persons with disabilities;
- Post this plan on its website (www.msmlaw.ca);
- Report as required on its website (www.msmlaw.ca) the progress of the implementation of this plan;
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years.

CUSTOMER SERVICE STANDARDS

Commitment:

Macdonald Sager Manis LLP has been in compliance with the Accessible Customer Service Regulation under the AODA, and will continue to comply with the Customer Service Standards under the IASR.

Macdonald Sager Manis LLP is committed to providing legal services to all clients of the firm, including persons with

disabilities and it will carry out its functions in a manner which delivers an accessible customer service experience.

Macdonald Sager Manis LLP is committed to providing legal services in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever possible and will ensure that persons with disabilities will benefit from the same services, in the same place and in a similar way as other clients.

Action Taken:

The following measures have been implemented by the Macdonald Sager Manis LLP:

- Ensuring all members of our firm who deal with our clients or members of the firm, to include those who are involved in the development and approval of firm policies, and procedures, are trained to communicate and provide the best possible client service to all clientele, including persons with disabilities;
- Ensuring members of the firm are aware of various assistive devices that may be used by clients with disabilities who are accessing the Macdonald Sager Manis' legal services;
- Ensuring completion of accessibility training is tracked and recorded;

- Providing fully-accessible telephone, email , written services to clients;
- Ensuring customers accompanied by a guide dog or other service animal in areas of the firm are accommodated;
- Ensuring that if a person with a disability is accompanied by a support person, the support person is accommodated. If the support person is assisting the client the support person is not charged a fee to attend any client meeting.
- Providing public with notice in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities, by placing such notices at all public entrances, hallway/elevator and reception area of the firm. If the disruption turn long-term, the firm will post an announcement on its website informing clients the duration of the disruption and alternate solutions;
- Continuing to welcome and appreciate feedback from persons with disabilities and providing a feedback form either in person or on firm website;

ACCESS TO SUITE

Commitment:

Macdonald Sager Manis LLP is committed to incorporating accessibility criteria for clients and members of the firm when providing legal services, except where it is not practicable to do so.

Action Taken:

The following measures have been implemented by the firm;

- All current and future renovations will comply with the standards in regard to access; whether it be to hallway access, meeting rooms, common areas, offices and workstations;
- If it is not practicable to incorporate accessibility criteria, the firm will provide an explanation upon request;
- Provide educational awareness and tools to members of the firm and communication to clients, informing on changes to procurement procedures;

TRAINING

Commitment:

Macdonald Sager Manis LLP is committed to implementing a process to ensure that all employees, who provide services to clients, and persons participating in the development and approval of the firm's policies, are provided with appropriate training on the requirements of the IASR and on the Ontario

Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable.

Action Taken:

The following measures have been implemented by the Macdonald Sager Manis LLP, effective January 1, 2014 and following;

- Establish an internal committee with the responsibility for developing appropriate training;
- Determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all employees, and persons participating in the development and approval of the firms policies;
- Ensure that the training is provided to persons referenced above within the first three months of employment with the firm;
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided;
- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis.

INFORMATION AND COMMUNICATION STANDARDS

Commitment:

Macdonald Sager Manis LLP is committed to making company information and communications accessible to persons with disabilities. Macdonald Sager Manis LLP will incorporate new accessibility requirements under the information and communication standard to ensure that its information and communications systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

1. Feedback, Accessible Formats and Communication Supports

Action Taken:

The following measures were implemented by the firm, effective January 1, 2014;

- Ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- More broadly, as a general principle where accessible formats and communication supports for persons with disabilities are requested:

- Provide or arrange for the provision of such accessible formats and communication supports;
- Consult with the person making the request to determine the suitability of the accessible format or communication support;
- Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other clients;

Accessible Formats & Communication Supports (or other applicable compliance date as set out in the IASR)

2. Accessible Websites and Web Content

Accomplishments to Date:

- Visitors to the firm website www.msmlaw.ca have access to the listing of law practices , at no cost;
- New website content will be coded in a compliant fashion;
- Adoption of standards in Internet technology to ensure the public websites are compatible with the above-mentioned tools and have moved away from non-W3C

formats (World Wide Web Compliant) to more flexible Internet rich media in the website implementations;

- AODA compliance is included as one of the criteria in selecting technology vendors for new website development initiatives.

Planned Action:

In accordance with the IASR, the firm will:

- Ensure development of its next generation digital platform for public websites, mobile applications, in-store media and information technology infrastructure meet AODA Information and Communication Standards and that partnering vendors have necessary expertise with such technology;
- Follow the mandated Accessibility Directorate of Ontario (ADO) guidelines and Province of Ontario I&IT solutions that support obligated Private Sector and Broader Public Sector organizations in compliance initiatives;
- Provide guidelines to all staff to ensure public documents and media are readily available in alternate accessible formats;
- Develop and communicate best practices; and

- Expand firm awareness of requirements for compliance with Information and Communication Standards of AODA.

EMPLOYMENT STANDARDS

1. Recruitment

Commitment:

Macdonald Sager Manis LLP is committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

Action Taken:

The following measures were implemented by the firm:

Recruitment

The firm will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Specifying that accommodation is available for applicants with disabilities, on the firm's website and on job postings;

Recruitment, assessment and selection

The firm will notify job applicants, when they are individually selected to participate in a selection process; accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;
- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment;
- If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, the firm will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes;

- Inclusion of notification of the firm's policies on accommodating employees with disabilities in offer of employment letters.

2. Informing Employees of Supports

In accordance with the IASR, the firm will inform all employees of policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

Action Taken:

The following measures were implemented by the firm:

- Informing current employees and new hires of the firm's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability;
- Providing information under this section as soon as practicable after the new employee begins employment, specifically in the orientation process;
- Keeping employees up to date on changes to existing policies on job accommodations with respect to disability;

- Where an employee with a disability so requests it, the firm will provide or arrange for provision of suitable accessible formats and communications supports for:
 - Information that is needed in order to perform the employee's job;
 - Information that is generally available to employees in the workplace.
- In meeting the obligations to provide the information that is set out in the paragraph above, the firm will consult with the requesting employee in determining the suitability of an accessible format or communication support.

3. Documented Individual Accommodation Plans/Return to Work Process

Commitment:

The firm will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

Action Taken:

The following measures have been implemented by the firm;

The firm's existing policies include steps that the firm will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

The firm will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required.

The firm will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR:

- Include in the process the manner in which the employee requesting accommodation can participate in the development of the plan;
- Include in the process the means by which the employee is assessed on an individual basis;
- Include in the process the manner in which the firm can request an evaluation by an outside medical or other expert, at the firm's expense, to assist the firm in determining if and how accommodation can be achieved;
- Steps are in place to protect the privacy of the employee's personal information;

- Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- Provide the employee with the reasons for the denial if an individual accommodation plan is denied;
- Include in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs;
- If individual accommodation plans are established, ensure that they include:
 - Individualized workplace emergency response information that is required;
 - Any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
 - Information that is needed in order to perform the employee's job;
 - Information that is generally available to employees in the workplace.
- Identify any other accommodation that is to be provided to the employee.

The firm will ensure that the return to work process as set out in its existing policies outlines the steps the firm will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

4. Performance Management, Career Development and Redeployment

Commitment:

The firm will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- When using its performance management process in respect of employees with disabilities;
- When providing career development and advancement to its employees with disabilities;
- When redeploying employees with disabilities.

Action Taken:

The following measures have been implemented by the firm;

- Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
 - Assessing performance
 - Managing career development and advancement
 - Redeployment is required
- Review, assess and, as necessary, include in Performance Management accessibility criteria;
- Take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on job postings;
- Take into account the accessibility needs of employees with disabilities when redeploying employees;

Design of Public Spaces Standards (Accessibility for the Built Environments)

Commitment:

The firm is committed to designing public spaces that are free from barriers and accessible to all clients and members of the firm while undertaking new construction or planned significant alterations.

Action Taken:

In accordance with the IASR, the firm implemented the following:

- The firm shall comply with the AODA Design of Public Spaces Standards (Accessibility Standards for the Built Environment) when undertaking new construction or planned significant alterations of public spaces.

Attitudinal Barriers

Possible Solutions

- Thinking that people with intellectual disabilities are not able to make decisions. Do not assume what employees or customers with disabilities can or cannot do. Ask them.
- Assuming that a person who has speech impairment cannot understand you. Train staff to interact and communicate with people with different types of disabilities.
- Believing a person who has a mental health disability or someone who uses a wheelchair would not be a good

employee. Learn about ways you can accommodate employees with disabilities.

- Assuming that a person with vision loss cannot enjoy movies, TV or concerts. Learn about the different ways and available technologies that help people with vision loss enjoy movies, TV and concerts.
- Avoiding a person with a disability in fear of saying the wrong word or offending them. Train staff to interact and communicate with people with different types of disabilities.
- Thinking that every person with a disability will need costly accommodation. Learn about the types of accommodations for people with disabilities. Many are low cost.
- Informational and communication barriers arise when a person with a disability cannot easily receive and/or understand information that is available to others.

Informational and Communication Barriers

Possible Solutions

- Print that is too small to read. Make everyday documents, easy to read by making sure that the print is legible for most people.
- Presentation materials for meetings, such as slide and videos are not accessible to employees with low vision or

who have hearing loss. Develop a template for slides using large fonts, high contrast colours and clean layout.

- Provide a visual description of the slides when making a presentation.
- Brochures are not clear or easily understood. Use plain language, symbols and pictures to get your message across.
- Website pictures don't have descriptions. Provide descriptions or alt tags for pictures for people with vision loss.
- Seating arrangements make it difficult for people who have hearing loss to fully participate in meetings. Arrange seating at a table to facilitate lip reading. Use assistive listening as appropriate.
- Marketing and communications are not inclusive, either in depicting people with disabilities, including them as a potential target audience, or in considering them. Check that your marketing and communications efforts reach people with disabilities.
- Technological barriers occur when technology or the way it is used does not meet the needs of people with disabilities.

Technological Barriers

Possible Solutions

- Having only one way for your customers to reach you, for example, by telephone only. Allow customers to contact you in a variety of ways including telephone, email, written feedback forms.
- Accepting only online job applications. Welcome job applications in a number of formats.
- Systemic barriers in policies, practices and procedures and result in people with disabilities being treated differently than others or sometimes excluded altogether.

Systemic Barriers

Possible Solutions

- People with disabilities are excluded from events, or included as an after-thought when planning events. Make sure that accessibility is considered when making plans for events and invite attendees to tell you if they have different needs.
- Not knowing about the different types of accommodations an employee might need to return to work after an absence due to a disability. Learn about the types of accommodations employees might need. Talking with employees about their specific needs is a good first step.
- There is no leadership or accountability for issues related to accessibility for people with disabilities. Designate a

point person to implement accessibility policies and procedures.

- Hiring policies do not encourage applications from people with disabilities. Review current hiring processes to identify and remove barriers such as inaccessible locations for interviews.
- Physical and architectural barriers in the environment and prevent access for people with disabilities.

Physical/Architectural Barriers

Possible Solutions

Aisles are blocked by file boxes making them too narrow for a person using a wheelchair or walker. Consider the paths that your employees and clients take when navigating throughout the office.