
**ACCESSIBLE CUSTOMER SERVICE
POLICY**

LEX MANAGEMENT LTD.

**Management Service Provider for
Carters Professional Corporation**

February 28, 2012

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Dated the 28th day of February, 2012

Date of Board Approval: February 28, 2012

1.01 Providing Services to People with Disabilities

Lex Management Ltd. (hereinafter “Lex”) is committed to excellence in serving all clients including people with disabilities.

1.02 Purpose

The purpose of this Accessible Customer Service Policy is to fulfill the requirements set out in regulation 429/07 of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and to establish a policy for Lex Management Ltd. that governs the provision of its services to persons with disabilities.

1.03 Policy Overview

These policies and procedures apply to all services that are delivered by Lex, by any means including, but not limited to, services in person, by telephone, electronically, by mail, visually, orally or by written means.

1.04 Scope

The policy applies to all Lex staff, volunteers and third parties who deal with the public, on behalf of Lex.

1.05 **Definitions**

“Assistive Device” means devices used by persons with disabilities in order to allow equal opportunity and access to particular activities or services, as well as devices required for the maintenance of a person’s health and well-being, including but not limited to walkers, wheelchairs, white canes, note-taking devices and personal oxygen tanks to assist breathing.

“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 co-ordination, 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,
- (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; (“handicap”).

“Integrated Services” means that services are offered in way that allows people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. Integration means that policies, practices and procedures are designed to be accessible to everyone including people with disabilities.

“Service Animal” means an animal that is required by a person with a disability, for reasons relating to the disability.

“Undue Hardship” means the point at which the challenges to accommodate a person with a disability become so great that they are prohibitive. The Ontario Human Rights Code provides that whether individual has been accommodated to the point of undue hardship is determined by considering cost, outside sources of funding and health and safety requirements.

1.06 Policy

Lex is committed to delivering all of its services in a manner that respects the dignity, individuality and independence of persons with disabilities. Lex undertakes to ensure that individuals with disabilities are given equal access to opportunities to obtain, use and benefit from its services. As much as possible, such services will be integrated with the services that Lex delivers to all of its clients, unless alternative measures are necessary. As such, Lex shall meet its duties and responsibilities under Ontario Regulation 429/07 by adhering to the following principles and practices:

(a) Assistive devices

Lex recognizes that persons with disabilities may require the use of assistive devices. As such, Lex will take all reasonable measures to ensure that its premises are conducive to the use of such devices. Lex staff will make all necessary accommodations, up to the point of undue hardship on Lex, to enable clients to use assistive devices as required to access its services. Further, Lex staff will be trained and familiar with various assistive devices that may be used by clients with disabilities while accessing its services.

(b) Communication

Lex recognizes that persons with disabilities may have special requirements in terms of communications. Lex undertakes to communicate with persons with disabilities in ways that take into account their disability.

(c) Service animals

Lex allows service animals on the parts of its premises that are open to the public and in all situations where a person with a disability requires the service animal to access Lex's services, unless the animal is excluded by law from the premises. If a service animal is excluded by law, Lex will ensure that other measures are available to enable the person with a disability to obtain, use or benefit from Lex's services. Lex will also be sensitive to any accommodations that may be necessary as a result of the use of a service animal.

(d) Support persons

Lex is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter any of Lex's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on Lex's premises.

(e) Notice of temporary disruption

Lex will give notice of temporary disruptions to services or facilities used by persons with disabilities in order to obtain, use or benefit from its services. Such notice will include the reason(s) for the disruption, the anticipated duration of the disruption and a description of alternative facilities, if any, that will be available during the disruption. The notice shall be posted at a conspicuous place at the facility and on Lex's web site when appropriate. When the disruption is planned, advanced notice will be provided. Where the disruption is anticipated to affect individuals with visual or written comprehension impairments, steps will be taken to notify these individuals in a manner appropriate to their needs.

(f) Training for staff

Lex will provide training to employees and direct service volunteers who deal with the public or other third parties on its behalf and all those who are involved in the development and approvals of customer service policies, practices and procedures. Such training will be provided to each person as soon as practicable after he or she is assigned the applicable duties, and on an ongoing basis in connection with any changes in the law, policy, practices and procedures related to the provision of services to persons with disabilities.

Lex will ensure that the format for staff training is accessible and available in multiple formats, including, but not limited to, face to face classroom instruction, online training modules, and other formats as may be required. Lex will keep records of such staff training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

Staff training includes:

- ♦ An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standards (http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm)
- ♦ Lex's accessible customer service policy
- ♦ How to interact and communicate with people with various types of disabilities
- ♦ How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- ♦ How to use any equipment, devices and strategies that may help with the provision of goods or services to a person with a disability
- ♦ What to do if a person with a disability is having difficulty in accessing Lex's services.

(g) Feedback process

Clients who wish to provide feedback on the way the Lex provides services to people with disabilities can:

- ♦ Speak to a Operations Manager
- ♦ Contact the Operations Manager by telephone
- ♦ Fill in a feedback form available at the reception desk
- ♦ Contact the Operations Manager by e-mail, fax, or letter
- ♦ Complete an online feedback form

All feedback will be directed to the office of the President & Chief Executive Officer. Clients can expect to receive a response within ten (10) business days. Complaints will be addressed according to Lex's regular complaint management procedures.

(h) Availability of this policy

This policy is available to all clients and potential clients upon request. Clients and potential clients will be notified of the availability of this policy on Carters' website. If a person with a disability requests a copy of this policy, Lex will deliver the policy in a format that takes into account the person's disability.

(i) Modifications to this or other policies

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