



D.M. Wills Associates - Human Resources Policy

Policy Title:	Wills Accessible Customer Service Policy	Implementation Date:	January 1, 2024
Prepared By:	Human Resources	Last Reviewed/Revised:	
Approved By:	President	Page 1 of 8	

Background and Commitment

D.M. Wills Associates Limited (Wills) is committed to providing a barrier-free environment for all stakeholders, including clients, employees, job applicants, suppliers, and any visitors who may enter the Wills premises, access Wills information, or use Wills services. As an organization, Wills respects and upholds the requirements set forth under the Accessibility for Ontarians with Disabilities Act, 2005, and its associated regulations.

Wills understands the responsibility for ensuring a safe, dignified, and welcoming environment for everyone. Wills is committed to ensuring the organization's compliance by incorporating accessibility legislation into all policies, procedures, equipment requirements, training, and best practices. These policies and practices will be reviewed annually, as organizational changes occur, or in anticipation of compliance deadlines. In addition, Wills will strive to meet the needs of individuals with disabilities in a timely and effective manner.

Providing Services

- Wills is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.
- Wills understands that obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.
- Wills is committed to complying with both the Ontario Human Rights Code and the AODA.
- Wills is committed to excellence in serving all customers including people with disabilities.
- Wills' accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.



D.M. Wills Associates - Human Resources Policy

Policy Title:	Wills Accessible Customer Service Policy	Implementation Date:	January 1, 2024
Prepared By:	Human Resources	Last Reviewed/Revised:	
Approved By:	President	Page 2 of 8	

Assistive Devices

Persons with disabilities may use their own assistive devices, as required, when accessing services provided by Wills.

In cases where the assistive device presents a health and safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of services, up to the point of undue hardship.

Wills will ensure that all staff are trained and familiar with various assistive devices, as they are implemented on site or as they may be used by customers with disabilities while accessing Wills services or facilities.

Communication

Wills will create, provide and receive information and communications in ways that are accessible to people with disabilities. If Wills determines that it is not technically feasible to convert the information or communications, or the technology to convert the information or communication is not readily available, the person who requires the information will be provided with an explanation as to why the information or communications are not convertible and a summary of the unconvertible information or communications.

Service Animals

Wills welcomes any service animal to any part of Wills' premises that are open to the public and will offer assistance and accommodation, as required, to support the individual(s) and their support device(s) and/or service animals.



D.M. Wills Associates - Human Resources Policy

Policy Title:	Wills Accessible Customer Service Policy	Implementation Date:	January 1, 2024
Prepared By:	Human Resources	Last Reviewed/Revised:	
Approved By:	President	Page 3 of 8	

Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on the Wills premises. Wills will offer assistance and accommodation, as required, to support the individual(s) and their support device(s) and/or support person.

Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities, Wills will notify customers promptly via a posted notice. 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.

This notice will be placed at the front entrances to the Wills building, which is the only entrance accessible to the public. If a customer is scheduled to be at the Wills office and has a known disability, they will be contacted in advance to inform them of the service disruption.

Where a customer with a known disability has an appointment Wills will contact such customer to notify them of the disruption.

Training

Wills will ensure that training is provided to all employees on the requirements of the accessibility standards referred to in the Regulation and on the Human Rights Code as it pertains to persons with disabilities. Wills will provide accessible customer service training to:

- all employees
- anyone involved in developing Wills policies
- anyone who provides services or facilities to customers on Wills' behalf



D.M. Wills Associates - Human Resources Policy

Policy Title:	Wills Accessible Customer Service Policy	Implementation Date:	January 1, 2024
Prepared By:	Human Resources	Last Reviewed/Revised:	
Approved By:	President	Page 4 of 8	

Comprehensive training will be provided to all new employees to be completed during the first week of employment. Additionally, refresher training for AODA will be provided to all employees bi-annually.

Training will include:

- the purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- Wills' policies related to the customer service standard
- 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 the equipment or devices available on-site or otherwise that may help with providing services or facilities to people with disabilities.
- what to do if a person with a disability is having difficulty in accessing Wills' services or facilities

Staff will also be trained when changes are made to the accessibility customer service policies.

Training records will be maintained for all AODA training courses completed, including a record of the dates when training is provided and the employee(s) completing the training.

Feedback Process

Wills will provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers, upon request. Feedback is accepted in various methods, including verbally (in person or by telephone) or written (handwritten, delivered, or e-mail). Wills will make sure the feedback



D.M. Wills Associates - Human Resources Policy

Policy Title:	Wills Accessible Customer Service Policy	Implementation Date:	January 1, 2024
Prepared By:	Human Resources	Last Reviewed/Revised:	
Approved By:	President	Page 5 of 8	

process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

All feedback will be directed to Human Resources.

Customers can expect to hear back in ten (10) days.

Notice of Availability of Documents

Wills will notify the public that documents related to accessible customer service, are available upon request by posting a notice in the following location(s)/way(s):

- Included in Wills AODA policies, including the Wills Accessible Customer Service Policy and Multi-Year Accessibility Plan.
- Posted at the reception desk at the Wills office, which is the only entrance accessible to the public.

Wills will provide this document in an accessible format or with communication support, on request. The person making the request will be consulted to determine the suitability of the format or communication support. The accessible format will be provided in a timely manner and at no additional cost.

Modifications to this or Other Policies

Any policies of Wills that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.



D.M. Wills Associates - Human Resources Policy

Policy Title:	Wills Accessible Customer Service Policy	Implementation Date:	January 1, 2024
Prepared By:	Human Resources	Last Reviewed/Revised:	
Approved By:	President	Page 6 of 8	

Employment Standard and Recruitment

The Employment Standard builds upon the existing requirements under the Ontario Human Rights Code in relation to how to accommodate individuals with disabilities throughout the job application process and the employment relationship. It applies in respect to employees and does not apply to volunteers and other non-paid individuals.



D.M. Wills Associates - Human Resources Policy

Policy Title:	Wills Accessible Customer Service Policy	Implementation Date:	January 1, 2024
Prepared By:	Human Resources	Last Reviewed/Revised:	
Approved By:	President	Page 7 of 8	

When recruiting new employees, Wills will:

1. Notify employees and the public about the availability of accommodations for applicants with disabilities during the recruitment process when job applicants are individually selected to participate in an assessment or selection process. Additionally, all job postings on the Wills website will advise applicants that accommodations are available upon request.
2. Consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability, if a selected applicant requests an accommodation
3. Notify successful applicants of the policies for accommodating employees with disabilities. This includes both a statement within the offer of employment letter, as well as reference within the Wills Employee Handbook.

Emergency Information

Wills will provide all emergency procedures, plans or public safety information to the public in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Wills will also provide individualized workplace emergency response information to employees who have a disability:

1. If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability
2. With the employee's consent, to the person designated by Wills to provide assistance to the employee if required
3. As soon as practicable after becoming aware of the need for accommodation due to the employee's disability



D.M. Wills Associates - Human Resources Policy

Policy Title:	Wills Accessible Customer Service Policy	Implementation Date:	January 1, 2024
Prepared By:	Human Resources	Last Reviewed/Revised:	
Approved By:	President	Page 8 of 8	

4. Wills will review the individualized workplace emergency response information when the employee moves to a different location in the organization.

Accessible Formats

Wills will ensure that employees are aware of policies for employees with disabilities and any changes to these policies as they occur. The company will provide the information required to new employees as soon as practicable after they begin their employment.

If an employee with a disability requests it, the company will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform their job
- Information that is generally available to all employees in the workplace.

The company will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

Reference to these policies are within the Wills Employee Handbook, where a copy of this accessibility policy is also located.

Performance Management, Career Development and Advancement

Wills will consider the accessibility needs, including documented individual accommodation plans, of employees with disabilities during the company's performance management process. These will also be considered in the event of redeployment, or when offering career development or advancement opportunities.