

Accessibility for Ontarians with Disabilities Act (AODA)				
Multi-year Accessibility Plan for Integrated Accessibility Standards				
Compliance Date	Initiative	AODA Requirements	WeirFoulds LLP Action	Status
January 1, 2012	<p>Workplace Emergency Response Information: Ensure the provision of individualized workplace emergency response information to employees with disabilities.</p>	<p>Employment Standard: Workplace Emergency Response Information</p> <p>27 (1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, 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.</p> <p>27 (2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p> <p>27 (3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.</p> <p>27 (4) Every employer shall review the individualized workplace emergency response</p>	<ul style="list-style-type: none"> Human Resources Department will distribute "Persons Requiring Assistance" forms to ascertain the need for individualized workplace emergency response information for those employees with disabilities. The HR department will provide information regarding the individualized workplace emergency response procedures to individuals who requested the accommodation on the "Persons Requiring Assistance" forms. 	Complete

Accessibility for Ontarians with Disabilities Act (AODA)

Multi-year Accessibility Plan for Integrated Accessibility Standards

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		information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.		
January 1, 2014	Establishment of Accessibility Policies: Develop, implement, and maintain accessibility policies that include a statement of organizational commitment to meeting the accessibility needs of persons with disabilities.	<p>3 (1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation.</p> <p>3 (2) Obligated organizations shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.</p> <p>3 (3) Every obligated organization shall (a) prepare one or more written documents describing its policies; and (b) make the documents publicly available, and shall provide them in an accessible format upon request.</p>	<ul style="list-style-type: none"> • Created an Accessibility Policy and incorporated the existing Client Accessibility Policy. • Published the new policy in Policies and Procedures Manuals and posted it on WeirFoulds LLP website. 	Completed
January 1, 2014	Accessibility Plans: Establish, implement, maintain and document a multi-	4 (1) Large organizations shall, (a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent	<ul style="list-style-type: none"> • Created Multi-year Accessibility Plan. 	Completed

Accessibility for Ontarians with Disabilities Act (AODA)

Multi-year Accessibility Plan for Integrated Accessibility Standards

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	year accessibility plan outlining strategies to prevent and remove barriers and meet IASR requirements.	and remove barriers and meet its requirements under this Regulation; (b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and (c) review and update the accessibility plan at least once every five years	<ul style="list-style-type: none"> • Posted on WeirFoulds LLP website. • Created and implemented a review cycle. 	
January 1, 2014	Accessible Websites & Web Content: Ensure that internet websites and web content conform with WCAG 2.0 Level AA	14 (2) Large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA. By January 1, 2014, new internet websites and web content on those sites must conform with WCAG 2.0 Level A.	<ul style="list-style-type: none"> • Work with website provider to ensure compliance with WCAG 2.0 Level AA guidelines. • Should the Firm decide to implement a new website or re-design its existing website materially, we will ensure the website initiatives meet the WCAG 2.0, Level AA guidelines. 	Complete
January 1, 2015	Training: Provide training on the requirements of accessibility standards and the	Section 7 (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards and on the Human Rights Code as it pertains to persons with disabilities to: (a) all employees,	<ul style="list-style-type: none"> • Ensure that AODA training content includes the <i>Ontario Human Rights Code</i> as it pertains 	Complete

Accessibility for Ontarians with Disabilities Act (AODA)

Multi-year Accessibility Plan for Integrated Accessibility Standards

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	Human Rights Code to employees, volunteers, policy developers, and service providers.	<p>and volunteers; (b) all persons who participate in developing the organization’s policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.</p> <p>7 (2) The training shall be appropriate to the duties of the employees, volunteers and other persons.</p> <p>7 (3) Every person referred to in subsection (1) shall be trained as soon as practicable.</p> <p>7 (4) Every obligated organization shall provide training in respect of any changes to the policies on an ongoing basis.</p>	<p>to people with disabilities and the IASR.</p> <ul style="list-style-type: none"> Consider the requirement that the training be customized to different employee types and roles. 	
January 1, 2015	Feedback: Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities.	<p>11 (1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.</p> <p>11 (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<ul style="list-style-type: none"> Reviewed the existing feedback process to determine if improvements are required. 	Complete

Accessibility for Ontarians with Disabilities Act (AODA)

Multi-year Accessibility Plan for Integrated Accessibility Standards

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January 1, 2016	Accessible Formats & Communication Supports: Provide accessible formats and communication supports upon request.	<p>12 (1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, (a) in a timely manner that takes into account the person's accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons.</p> <p>12 (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p> <p>12 (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<ul style="list-style-type: none"> Communicated requirements to all hiring managers, supervisors, managers and directors. 	Complete
January 1, 2016	Recruitment Job Postings: Notify employees and the public about the availability of accommodations in the recruitment processes.	22 Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	<ul style="list-style-type: none"> Included accommodation information in job postings. 	Complete

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Multi-year Accessibility Plan for Integrated Accessibility Standards

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January 1, 2016	Recruitment, Assessment or Selection Process	<p>23 (1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>23 (2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.</p>	<ul style="list-style-type: none"> Human Resources to offer accommodation support to candidates being selected for interview. 	Complete
January 1, 2016	Notice to Successful Applicants	<p>24 Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<ul style="list-style-type: none"> Draft accommodation language to be inserted into offer package. 	Complete
January 1, 2016	Informing Employees of Supports: Inform employees of policies supporting employees with disabilities.	<p>25 (1) Every employer shall inform its employees of its policies used to support its 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 disability.</p> <p>25 (2) Employers shall provide the information required under this section to new employees</p>	<ul style="list-style-type: none"> Draft Accommodation Policy for approval by the Firm's Management Committee. Upon approval, publish policy in Policies and Procedures Manuals and post to WeirFoulds LLP 	Complete

Accessibility for Ontarians with Disabilities Act (AODA)

Multi-year Accessibility Plan for Integrated Accessibility Standards

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		<p>as soon as practicable after they begin their employment.</p> <p>25 (3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p>	<p>Human Resources Information System.</p> <ul style="list-style-type: none"> • Include information in new hire orientation. 	
<p>January 1, 2016</p>	<p>Accessible Formats and Communication Supports for Employees: Provide accessible formats and communication supports for employees' job-related information.</p>	<p>26 (1) Where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for: (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace.</p> <p>26 (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<ul style="list-style-type: none"> • Human Resources is aware of this requirement and consults with employees requiring communication supports and accessible formats. 	<p>Complete</p>
<p>January 1, 2016</p>	<p>Documented Individual Accommodation Plans: Develop written processes for documented</p>	<p>28 (1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p>	<ul style="list-style-type: none"> • Developed an Accommodation Policy and Procedure. 	<p>Complete</p>

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Multi-year Accessibility Plan for Integrated Accessibility Standards

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	individual accommodation plans.	<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved. 4. The steps taken to protect the privacy of the employee's personal information. 5. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 		

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Multi-year Accessibility Plan for Integrated Accessibility Standards

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		<p>6. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>7. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p> <p>8. Individual accommodation plans shall, (a) if requested, include any information regarding accessible formats and communication supports provided, as described in section 26; (b) if required, include individualized workplace emergency response information, as described in section 27; and (c) identify any other accommodation that is to be provided.</p>		
January 1, 2016	Return to Work Process: Develop a return to work process for employees who require disability-	29 (1) Every employer, other than an employer that is a small organization, (a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and (b) shall document the process.	<ul style="list-style-type: none"> • Review existing Short Term Disability Policy to ensure it is in compliance. • Consider the Return to Work process when 	Complete

Accessibility for Ontarians with Disabilities Act (AODA)

Multi-year Accessibility Plan for Integrated Accessibility Standards

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	related accommodations.	<p>29 (2) The return to work process shall, (a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and (b) use documented individual accommodation plans, as described in section 28, as part of the process.</p> <p>29 (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>	drafting the Accommodation Policy.	
January 1, 2016	<p>Performance Management: Consider the accessibility needs and individual accommodation plans of employees with disabilities in performance management, career development, and redeployment processes.</p>	30 (1) An employer that uses performance management in respect of its employees shall 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.	<ul style="list-style-type: none"> Human Resources is aware of this requirement and will implement it in practice. 	Complete

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Multi-year Accessibility Plan for Integrated Accessibility Standards

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January 1, 2016	Career Development and Advancement	31 (1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	<ul style="list-style-type: none"> Human Resources is aware of this requirement and will implement it in practice. 	Complete
January 1, 2016	Redeployment	32 (1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	<ul style="list-style-type: none"> Human Resources is aware of this requirement and will implement it in practice. 	Complete
Early November 2021	Accessible Websites and Web Content: Ensure all internet websites and web content conform with WCAG 2.0 Level AA, including success criteria 1.2.4 and 1.2.5.	<p>14 (4) By January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA, other than:</p> <p>i. success criteria 1.2.4 Captions (Live), and</p> <p>ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded).</p>	<ul style="list-style-type: none"> Marketing and Business Development Department worked with an external website auditor/developer to conform with all requirements for WCAG 2.0 Level AA. This complete overhaul was completed in early 2023. 	Completed