

Fogler, Rubinoff LLP
Multi-Year Accessibility Plan
PART I - General Requirements

Updated: 10/14/2021

Initiative	Description	Action	Status	Compliance Date
Establishment of Accessibility Policies	3. (1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	FR is dedicated to the implementation and maintenance of policies guided by our commitment to and the requirements under the Accessibility Standards. FR has a Customer Standard Policy that outlines services under the Accessibility for Ontarians with Disabilities Act, 2005.	Complete	Original Policy: October 2011 Revised policy: October 2021
	3. (2) Large organizations shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.	FR has a Statement of Commitment to Accessibility.	Complete	October 2021
Accessibility Plans	4. (1) Large organizations shall, a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent 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.	A copy of FR's Accessibility Plan is posted on its firm intranet and website. A copy will be provided in an accessible format upon request.	Complete	October 2021 Next review/update to take place in: 2026
Training	7. (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, a) all employees, 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.	All new hires receive training on the requirements of the accessibility standards referred to under the Integrated Accessibility Standards Regulation, and on the Ontario Human Rights Code.		March 2, 2015 (ongoing thereafter)
	7. (4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis.	FR will provide training when any changes are made to the policies outlined in section 3.		March 2, 2015 (ongoing thereafter)
	7. (5) Every obligated organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.	FR maintains training record for all legislated training requirements.		March 2, 2015 (ongoing thereafter)

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PART III – Employment Standard

Updated: 10/14/2021

Initiative	Description	Action	Status	Compliance Date
Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	FR has reviewed our recruitment process and ensures that our obligations are met under this section. Standard wording on job postings: <i>Fogler, Rubinoff LLP welcomes and encourages applications from people with disabilities. Accommodations are available on request for candidates taking part in all aspects of the selection process.</i>	Complete	ongoing
Recruitment, Assessment or Selection Process	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.	FR has implemented a new process in our recruitment process to ensure that job applicants are notified of the availability of accommodations when they are individually selected to participate in an assessment or selection process.	Complete	ongoing
	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.	If a selected applicant requests an accommodation, FR will provide or arrange for the provision of a suitable accommodation after consulting with the applicant.	Complete	ongoing
Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.		Complete	October 2021
Informing Employees of Supports	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.	Policies used to support its employees with disabilities are available to firm members on our internal intranet.	Complete	October 2021
	25. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.		Complete	October 2021
	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.	Firm members are notified via e-mail and our internal intranet whenever there are changes to existing policies.	Complete	ongoing
Accessible Formats & Communication Supports for Employees	26.1 In addition to its obligations under section 12, 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.	FR will provide or arrange for information that is needed to perform a job or that is generally available to employees in an accessible format upon request.	Complete	ongoing
	26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	FR will ensure all arrangements as noted above will be done in consultation with the employee making the request.	Complete	ongoing
Workplace Emergency	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.		Complete	ongoing
	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.			ongoing

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Response Information	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.		Complete	ongoing
	27. (4) Every employer shall review the individualized workplace emergency response 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.		Complete	ongoing
Documented Individual Accommodation Plans	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.		Complete	ongoing
	28. (2) The process for the development of documented individual accommodation plans shall include the following elements: 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 determine if and how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. 5. The steps taken to protect the privacy of the employee’s personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs due to disability.		Complete	ongoing
	28. (3) Individual accommodation plans shall, a) if requested, include any information regarding accessible formats and communications 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.	FR includes all items in 28(3) in individual accommodation plans.	Complete	ongoing
Return to Work Process	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.	An individualized return to work plan will be developed in collaboration with the individual based on their circumstances.	Complete	ongoing
	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 individual documented accommodation plans, as described in section 28, as part of the process.	If an employee is absent from work due to disability and requires accommodation in order to return to work, FR develops an individual RTW and accommodation plan for that individual, in consultation with an expert, where necessary.	Complete	ongoing

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	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.			
Performance Management	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.	FR will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process.	complete	ongoing
Career Development & 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.	FR will 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.	complete	ongoing
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.	FR will review all individual accommodation plans in conjunction with redeployment to ensure that related processes and tools are designed to take into account the accessibility needs of firm members with disabilities.	complete	ongoing

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PART III - Info & Communication

Updated: 10/14/2021

Initiative	Description	Action	Status	Compliance Date
Feedback	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 accessible formats and communications supports, upon request.	FR has an internal and external feedback processes.	Complete	ongoing
Accessible Formats & Communication Supports	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.	FR will consult with the person making the request to determine suitability of an accessible format or communication support.	Complete	ongoing
	12. (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.		Complete	ongoing
	12. (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.		Complete	ongoing
Accessible Websites & Web Content	14. (2) Designated public sector organizations and 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, and shall do so in accordance with the schedule set out in this section.	FR is taking action to ensure that its websites and web content will conform with WCAG 2.0 Level AA (excluding live captioning and audio description). FR is using 'AccessiBe' - Automated Web Accessibility Solution, on new website which is set to be launched September 1, 2021 (please note launch date has been delayed due to Covid-19).	In progress	September 2021