

MULTI-YEAR ACCESSIBILITY PLAN 2012-2025

CARSWELL, A THOMSON REUTERS BUSINESS

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SECTION 1: INTRODUCTION

The goal of the Accessibility for Ontarians with Disabilities Act (AODA) is to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations (IASR) under the AODA require that effective January 1, 2014, Carswell establishes, implements, maintains and documents a multi-year accessibility plan to outline our strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

Carswell introduced its first accessibility plan in compliance with the Accessibility for Ontarians with Disabilities Act (AODA) – Customer Service Standard in 2012. People interacting with persons with disabilities on behalf of Carswell are asked to keep in mind the four core principles of accessible service:

- Honouring someone's **Independence** means recognizing when a person is able to do things on his or her own without unnecessary help or interference from others.
- Showing consideration for someone's **Dignity** means providing service in a way that allows the individual to maintain self-respect and the respect of other persons
- We aim for **Integration** so that service can be provided in a way that allows all individuals to benefit from the same services, in the same place, and in the same or similar way as others, unless an alternate measure is necessary.
- We strive for **Equality** by providing service to individuals in such a way that they have an opportunity to access goods or services equal to that given to others.

This multi-year plan outlines Carswell's strategy to prevent and remove barriers to address the current and future requirements of the AODA. It highlights a number of accomplishments Carswell has achieved over the last few years in terms of barrier removal, and active steps taken to prevent barriers. This list is not exhaustive, but documents the organization's demonstration of efforts in the removal and prevention of barriers to access for persons with disabilities.

This evolving document is a snapshot of successive plans and retains a progressive approach towards activities that forecast full implementation of the AODA standards by 2025. This Plan will be updated regularly to reflect progress made towards full compliance with the AODA.

SECTION 2: AREAS OF ACCESS TO BE ADDRESSED

In 2005, the provincial government enacted the Accessibility for Ontarians with Disabilities Act, (AODA). The goal of this Act is to make Ontario fully accessible to persons with disabilities by 2025.

Under the AODA, the following accessibility standards establish certain requirements that are applicable to Carswell:

1. Customer Service Standard
2. Integrated Accessibility Standards Regulation (IASR)
 - a. General Requirements
 - b. Employment
 - c. Information and Communication Systems

As each of the above standards of the AODA are codified as regulations, creating legal obligations for Carswell, the Accessibility Plan will compare its accomplishments in enhancing accessibility with the formal requirements of each standard. In accordance with the requirements, Carswell will:

- Establish, review and update this plan
- Post this plan at www.carswell.com
- Report as required on the progress of the implementation of the plan
- Provide this plan in an accessibility format, upon request
- Review and update this plan at least once every 5 years.

As of September 2012, the Customer Service Standard (O.Reg. 429/07) and the Integrated Accessibility Standards Regulation (Or. Reg. 191/11) have been finalized into regulation, and Carswell has met its primary obligations under those regulations, namely the provision of mandatory training for those engaged in the provision of services to members of the public. Efforts are now underway to achieve compliance with the Information and Communications and the Employment aspects of the IASR through the development of tools and resources to provide accessible materials and training initiatives to support these Standards.

SECTION 3: OUR STATEMENT OF COMMITMENT

OUR COMMITMENT TO CUSTOMERS WITH DISABILITIES WE ARE COMMITTED TO CREATING AN ACCESSIBLE WORKPLACE

As an organization, we are committed to understanding the needs of all customers and to meeting legislative requirements as they relate to customers, our business and our employees.

To comply with the *Accessibility for Ontarians with Disabilities Act, 2005*, S.O. 2005, c. 11 (AODA), we have implemented policies and procedures to treat all customers and employees with dignity and respect. We are dedicated to identifying and removing barriers so that we promote a safe, accessible environment for our customers, employees, suppliers, job applicants, visitors, and all others who enter our premises, do business with us, access our company website or communicate with us. We are also committed to giving persons with disabilities the opportunity to access our goods and services in the same place and in a similar way as other customers, and to accommodating applicants and employees to provide equal access to employment opportunities.

Accessibility Standards for Customer Service – The Accessibility Standards for Customer Service (O. Reg. 429/07) became applicable to Carswell on January 1, 2012. Carswell has written policies and procedures governing the provision of its goods and services to persons with disabilities. The policies and procedures are available to all customers upon request. Carswell offers feedback processes for customers to share their experiences with us, provides training to employees who interact with customers, and completes compliance reports every three years. View our [Policy for providing access to goods and services to people with disabilities here](#).

Integrated Accessibility Standards – Pursuant to the Integrated Accessibility Standards, O. Reg. 191/11, the deadlines for standards outlining compliance for information and communication will become applicable to Carswell beginning on January 1, 2014.

ACCESS TO INFORMATION FROM AN ONLINE PRODUCT OR WEBSITE

Carswell strives to make its products and services accessible to all users, where practical. To meet the requirements in Part II of the Integrated Accessibility Standards we are actively working within the mandated timelines to increase the accessibility and usability of our online products and websites, and in doing so, to adhere to many of the principles, guidelines, success criteria and techniques as defined in the World Wide Web Consortium Web Content Accessibility Guidelines 2.0 (WCAG 2.0). WCAG 2.0 assists website developers by describing best practices for creating websites that are accessible to all users.

Our efforts to make our websites and content meet AODA and WCAG 2.0 guidelines to improve accessibility are ongoing, and we will make every effort to incorporate accessibility features where possible and practical into new material added to our online products and websites. We encourage anyone who experiences difficulties accessing information to contact our Accessibility Manager at carswell.accessibility@thomsonreuters.com or by phone at 1-855-672-5240. In cases where information is not available in an accessible format, reasonable efforts will be used to provide customers with an accessible alternative or assistance in acquiring the information they need.

Carswell supports customers with disabilities by providing an alternate version of information available in an online product, where practical, upon request. To request an alternate version of information, please contact our Accessibility Manager. Please note that not all information may be available in an alternate format.

Additionally, due to conditions beyond our control, there are some instances where we are unable to provide information in an accessible format (for example, some RSS feeds, etc). We will be monitoring these sections, and develop an accessible solution as technology improves, and where it is reasonable to do so.

Our online products and websites may also contain links to documents and websites of external organizations, and internal archival documentation and websites, which may not provide full accessibility.

Archived Content

Information identified as “archived content” in any of our websites or products is provided for reference, research or recordkeeping purposes. It is *not* subject to the Web Standards and has not been altered or updated since it was archived. Please contact our Accessibility Manager to request an accessible alternative (if available) or assistance in acquiring the information you need.

A statement advising customers of content that is not accessible will be provided where required (sample below):

Carswell is committed to providing web content and web services which are accessible to the widest possible audience. Unfortunately, it is not always possible to enable accessibility and usability to all areas of the website. Carswell acknowledges that while attempting to ensure information is as up to date as possible, some content may not be as accessible to some users. If you have any difficulties, questions or suggestions regarding the accessibility of this site, please contact us at carswell.accessibility@thomsonreuters.com.

Archived Content. *This content was archived in xxx, 20xx. Information identified as archived is provided for reference, research or recordkeeping purposes. It is not subject to WCAG 2.0 Standards and has not been altered or updated since it was archived. Please contact us if you require an alternate format.*

ACCESS TO ACADEMIC MATERIALS

Everyone needs to be able to learn, and Carswell supports learning by making available accessible or conversion-ready versions of course-required print materials in .pdf format directly to schools, colleges and universities upon request. The .pdfs can be used in conjunction with specially designed software to create specially formatted copies and/or sound recordings tailored to the individual needs of the student.

To request .pdf copies of course-required titles, view our [Accessibility Policy on the Carswell Desk Copy site](#) at www.carswelldeskcop.com.

Questions or Feedback

As we continue to improve our online products and websites, we will update our Accessibility statement.

If you have questions or feedback about the accessibility of any of our products, or if you require an alternate format of a specific product or content from one of our websites, please contact our Accessibility Manager by email at carswell.accessibility@thomsonreuters.com, by phone at 1-855-672-5240, by fax at 416-298-5004, or by letter addressed to Accessibility Manager at Carswell, a Thomson Reuters business, 2075 Kennedy Road, Scarborough, Ontario M1T3V4. Your feedback will help us improve the experience for all customers.

Updated: April 22,2014

SECTION 4: CARSWELL'S ACCESSIBILITY PLAN (REVISED DECEMBER 2013)

Initiative/Action	Description	Completion Status	AODA Compliance Date
Customer Service Standard - O. Reg. 429/07			
Establishment of Policies, Practices and Procedures	<p>Policies and Practices must be compatible with the following principles:</p> <ol style="list-style-type: none"> 1. Respect for dignity and independence 2. Integration 3. Equality 	<ul style="list-style-type: none"> ✓ Policy on Accessibility approved Fall 2011. This policy reflects Carswell's commitment to fostering, creating and maintaining a barrier-free environment for all individuals. Further, the policy provides Guidelines on specific accessibility considerations in accordance with AODA. The guidelines developed in line with the AODA Customer Service standard include principles and protocols with respect to the following: <ol style="list-style-type: none"> 1. Use of Assistive Devices 2. Service Animals and Support Persons 3. Notice of Temporary Disruptions in Service 4. Providing Feedback and Complaints ✓ Policy and practices posted to Accessibility site on carswell.com - December 31/2011 - http://www.carswell.com/accessibility/ ✓ Policy and practices reviewed annually based on changes to internal workflows 	January 1, 2012
Training	<p>Customer Service training must be provided for:</p> <ul style="list-style-type: none"> • Those who interact with members of the public on behalf of the Company: • Persons who participate in developing the Carswell's policies, practices and procedures governing the provision of goods or services to members of the public or other third parties. 	<ul style="list-style-type: none"> ✓ Training developed and facilitated for affected employees - December 31/2011; training provided through onboarding processes as required ✓ All training tracked and recorded - ongoing ✓ AODA Awareness and Customer Service Training is available at: http://thecircle.carswell.com/OurCompany/OurBusiness/CreatingAccessibleWorkplace(AODA).aspx 	January 1, 2012
Feedback Process	<p>Establish an accessible process for receiving and responding to feedback about the manner in which Carswell provides goods or services to persons with disabilities.</p> <p>The information about the process will be readily available to the public.</p>	<ul style="list-style-type: none"> ✓ Feedback process for customers established and posted to Accessibility site on carswell.com by December 31/2011 ✓ Process reviewed annually based on changes to internal workflows ✓ Process updated in December 2013 to create unique phone/email for Accessibility Manager at Carswell; provides improved tracking of questions/requests and consistent responses/actions 	January 1, 2012

Initiative/Action	Description	Completion Status	AODA Compliance Date
Integrated Accessibility Standards Regulation - O. Reg. 191/11 Part I – General			
Section 3 Establishment of Accessibility Policies	s. 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	<ul style="list-style-type: none"> ✓ Developed and posted – November 2013 ✓ Carswell's Accessibility Policy is available at: http://www.carswell.com//accessibility/ 	January 1, 2014
Section 4 Accessibility Plans	<p>s. 4(1) Designated private sector organizations shall,</p> <p>(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;</p> <p>(b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>(c) review and update the accessibility plan at least once every five years</p>	<ul style="list-style-type: none"> ✓ Developed and posted – December 2013 ✓ Will be reviewed regularly based on changes to workflows and processes and as additional sections of legislation are "in force" ✓ Carswell's Accessibility Policy is available at: http://www.carswell.com//accessibility/ 	January 1, 2014
Section 7 Training	<p>s. 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 <i>Human Rights Code</i> as it pertains to persons with disabilities to,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<ul style="list-style-type: none"> ✓ AODA Awareness training developed and facilitated for all employees – November 2013; training provided through onboarding processes for all new hires ✓ All training tracked and recorded - ongoing ✓ AODA Awareness and Customer Service Training materials/recorded webex sessions are available for employees on Carswell's intranet site: http://thecircle.carswell.com/OurCompany/OurBusiness/CreatinganAccessibleWorkplace(AODA).aspx 	January 1, 2015

Initiative/Action	Description	Completion Status	AODA Compliance Date
Integrated Accessibility Standards Regulation, O. Reg. 191/11 Part II - Information and Communication Standards			
Section 11 Feedback	s. 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.	<ul style="list-style-type: none"> ✓ Feedback process for customers established and posted to Accessibility site on carswell.com by December 31/2011 ✓ Process reviewed annually based on changes to internal workflows ✓ Process updated in December 2013 to create unique phone/email for Accessibility Manager at Carswell; provides improved tracking of questions/requests and consistent responses/actions 	January 1, 2015
Section 12 Accessible formats and Communication Supports	<p>s. 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,</p> <p>(a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>(b) at a cost that is no more than the regular cost charged to other persons.</p>	<p>In our Statement of Commitment</p> <p>http://www.carswell.com/accessibility/commitment-to-accessibility/</p> <p>Our Statement of Commitment was updated April 22, 2014</p>	January 1, 2016
	s. 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>In our Statement of Commitment</p> <p>http://www.carswell.com/accessibility/commitment-to-accessibility/</p> <p>Our Statement of Commitment was updated April 22, 2014</p>	
	s. 12 (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<p>In our Statement of Commitment</p> <p>http://www.carswell.com/accessibility/commitment-to-accessibility/</p> <p>Our Statement of Commitment was updated April 22, 2014</p>	

Initiative/Action	Description	Completion Status	AODA Compliance Date
Integrated Accessibility Standards Regulation, O. Reg. 191/11 Part II - Information and Communication Standards			
Section 14 Accessible websites and web content	<p>s. 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</p>	<p>Efforts to make our websites and content meet AODA and WCAG 2.0 guidelines to improve accessibility are ongoing, and we will make every effort to incorporate accessibility features where possible and practical into new material added to our online products and websites. Activities/completion since June 2012 include:</p> <ul style="list-style-type: none"> ✓ June 2012 - Create a working group to focus on the implications of the Information & Communications Standard ✓ Conduct a thorough Accessibility Audit to assess existing level of accessibility for websites/online products and determine approach to implement WCAG 2.0 Guidelines for new products/content introduced after January 1/14 ✓ March 2013 - Research and define Training plan to provide training/resources to key teams (web/product design, testing, customer learning, etc.) ✓ June 2013 – Develop Subject Matter Expert (SME) team to begin training on the requirements under the proposed act to develop best practices and workflows/processes for moving forward ✓ September 2013 - Incorporating AODA success criteria as part of design specifications and product requirements for all products to be launched after January 1, 2014 ✓ October 2013 - AODA compliance requirement incorporated into roles/responsibilities and expectations for employees in product development, marketing, IT, content/editorial ✓ December 2013- Using Product Accessibility Tool (designed by Thomson Reuters) to assess all products and determine levels of compliance for each guideline as well as progress/next steps to drive compliance within products ✓ December 2013 – launched WestlawNext Canada, with many aspects meeting WCAG 2.0 Level A guidelines ✓ As new external websites are designed, or as existing external websites are reviewed for redesign/relaunch, WCAG 2.0 guidelines will be incorporated where practicable – ongoing project ✓ Developed VPAT process to monitor web accessibility and decisions on a go forward basis ✓ Implemented Governance Team to meet and review progress semi-annually 	<p>January 1, 2014 – new internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p>January 1, 2021 – all internet websites and web content must conform with WCAG 2.0 Level AA, other than, i. success criteria 1.2.4 Captions (Live), and ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded).</p>

AODA Standard/ Regulation Section References	Description	Completion Status	AODA Compliance Date
Integrated Accessibility Standards Regulation, O. Reg. 191/11 Part II - Information and Communication Standards			
Section 17 Producers of educational or training material	<p>s. 17 (1) Every obligated organization that is a producer of educational or training textbooks for educational or training institutions shall upon request make accessible or conversion ready versions of the textbooks available to the institutions.</p> <p>(2) Every obligated organization that is a producer of print-based educational or training supplementary learning resources for educational or training institutions shall upon request make accessible or conversion ready versions of the printed materials available to the institutions.</p>	<ul style="list-style-type: none"> ✓ For many years, Carswell has supported learning by making available accessible or conversion-ready versions of course-required print materials in .pdf format directly to schools, colleges and universities upon request. The .pdfs can be used in conjunction with specially designed software to create specially formatted copies and/or sound recordings tailored to the individual needs of the student. Request process can be viewed at: http://www.carswelldesktop.com/accessibilitypolicy.aspx?l=1&p=238 ✓ Beginning 2014, Instructional Design team developing materials or recreating materials in accessible word/.pdf format for customer learning purposes – ongoing project 	<p>January 1, 2015 – for accessible or conversion-ready versions of textbooks</p> <p>January 1, 2020 - for accessible or conversion ready versions of printed materials that are educational or training supplementary learning resources</p>

AODA Standard/ Regulation Section References	Description	Completion Status	AODA Compliance Date
Carswell Accessibility Plan – 2012-2025 Integrated Accessibility Standards Regulation, O. Reg. 191/11 Part III - Employment Standards			
Section 22 Recruitment, general	s. 22 Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Standard accommodation statement included in all Carswell job postings to make applicants (internal/external) aware that in accordance with AODA accommodation is available. “Accommodation will be provided in all parts of the recruitment and assessment process as required under Carswell’s Accessibility policy. Applicants need to make their needs known in advance.”	January 1, 2016 Complete
Section 23 Recruitment, assessment or selection process	s. 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.	Incorporate language in all notifications to applicants for interview (email and phone) that in accordance with AODA, accommodation is available upon request. “Carswell, a Thomson Reuters business welcomes and encourages applications from people with disabilities. Accommodations are available upon request for candidates taking part in all aspects of the selection process.” We will create a “How to” for hiring managers to communicate with potential hires. (TBD)	January 1, 2016
	s. 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.	Develop scripts for “how to” engage in conversations to solicit and handle accommodation requests – provide to hiring managers. (TBD) Review recruitment process (tests, assessment, rooms) to ensure barriers may be removed or accessible features provided, upon request in accordance with AODA. (TBD)	
Section 24 Notice to successful applicants	s. 24 Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Incorporate in offer letter a section regarding Carswell’s accessibility policies and where to access additional information on Carswell internal and external internet. Hiring managers, when making offers of employment, will notify the successful applicant of our policies for accommodating employees with disabilities. “When requested, Thomson Reuters will provide accommodations for employees with disabilities where possible. Please contact your manager if you would like to discuss your accommodation needs. Managers will review the request with Human Resources to determine available options. Please note that documentation may be requested from you to support the need for an accommodation. Further information regarding Carswell’s Accommodation policy can be found on the Carswell web site (www.carswell.com) as well as our internal intranet site”.	January 1, 2016

Section 25 Informing employees of supports	s. 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.	2013 – Accommodation policy defined as part of corporate policies; AODA pages introduced to company intranet with information on disability awareness, accommodation and training; policies and information available at: http://thecircle.carswell.com/OurCompany/OurBusiness/CreatinganAccessibleWorkplace(AODA).aspx	January 1, 2016
	s. 25 (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	2013 – communicated as part of onboarding process when employees gain access to corporate intranet	
	s. 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.	Policy review team meets quarterly to review all policy changes and determine communications to ensure intranet updated and employees informed	

AODA Standard/ Regulation Section References	Description	Completion Status	AODA Compliance Date
Integrated Accessibility Standards Regulation, O. Reg. 191/11 Part III - Employment Standards			
Section 26 Accessible formats and communication supports for employees	<p>s. 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,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p> <p>s. 26 (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>Accommodation Policy was introduced November 2013</p> <p>When an employee with a disability so requests it (voice activated software, accessible PDFs), we will provide or arrange for provisions of suitable accessible formats and communication supports for:</p> <ul style="list-style-type: none"> • Information that is needed in order to perform the employee's job; • Information that is generally available to employees in the workplace <p>In order to meet this obligation, we will consult with the requesting employee to determine the suitability of an accessible format or communication support.</p>	<p>January 1, 2016</p>
Section 27 Workplace emergency response information	<p>s. 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>s. 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>s. 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>Accommodation Policy introduced November 2013</p> <p>In situations where we are aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information are provided to the employee as soon as practicable if such information is necessary give the nature of the employee's disability. There individualized emergency response plans are maintained in HR and are:</p> <ul style="list-style-type: none"> • Communicated to the employee's respective manager, JHSC and Facilities Manager, where the employee's consent has been obtained, and on an as needed basis. • Reviewed and assessed on an ongoing and regular basis to ensure that accessibility issues are addressed. A reminder is sent out yearly. • Accommodation request form is available on the Carswell intranet 	<p>January 1, 2016</p>

AODA Standard/ Regulation Section References	Description	Completion Status	AODA Compliance Date
Integrated Accessibility Standards Regulation, O. Reg. 191/11 Part III - Employment Standards			
Section 27 (continued) Workplace emergency response information	s. 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.	Carswell provides individualized workplace emergency response information to each employee who requires an accommodation or if Carswell is aware of the need for an accommodation. Carswell reviews individualized workplace emergency response information when required. Annual updates/review by employee's. Accommodation includes a buddy system.	January 1, 2016

<p>Section 28</p> <p>Documented individual accommodation plans</p>	<p>s. 28 (1) Employers shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>s. 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 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. 	<p>Our existing processes with our Benefits Provider and STD provider include steps that we take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.</p> <p>Our existing process with our Benefits Provider and STD provider include steps that we take to document individual accommodation plans and include the following:</p> <ul style="list-style-type: none"> • The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. • The means by which the employee is assessed on an individual basis. • The manner in which the employer can request an accommodation can be achieved. • 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. • The steps taken to protect the privacy of the employee's personal information • The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. • If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. • The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. <p>Carswell has also created a comprehensive return to work package which is reviewed with the manager and employee to ensure a smooth transition/ return to work process that supports the employee's ongoing recovery.</p>	<p>January 1, 2016</p>
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AODA Standard/ Regulation Section References	Description	Completion Status	AODA Compliance Date
Integrated Accessibility Standards Regulation, O. Reg. 191/11 Part III - Employment Standards			
Section 29 Return to work process	<p>s. 29 (1) Every employer, other than an employer that is a small organization,</p> <p>(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</p> <p>(b) shall document the process.</p>	Existing process with our Benefits Provider / STD provider (STD/LTD adjudicators) to be reviewed based on legislation to determine effectiveness and compliance; standard process to be developed and communicated to employees	January 1, 2016
	<p>s. 29 (2) The return to work process shall,</p> <p>(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</p> <p>(b) use documented individual accommodation plans, as described in section 28, as part of the process.</p>	Existing process with our Benefits Provider / STD provider (STD/LTD adjudicators) to be reviewed based on legislation to determine effectiveness and compliance; standard process to be developed and communicated to employees	
	<p>s. 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>		
Section 30 Performance management	<p>s. 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.</p>	<p>We will take into account accessibility needs of employees with disabilities, as well as individual accommodation plans:</p> <ul style="list-style-type: none"> • When using our performance management process in respect of employees with disabilities, as well as individual accommodation plans; • When providing career development and advancement to our employees with disabilities; • When redeploying employees with disabilities <p>Managers/Supervisors will work with the employee and provide assistance to anyone needing an accommodation with entering in information into our HRIS system.</p>	January 1, 2016

AODA Standard/ Regulation Section References	Description	Completion Status	AODA Compliance Date
Integrated Accessibility Standards Regulation, O. Reg. 191/11 Part III - Employment Standards			
Section 31 Career development and advancement	s. 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.	Carswell will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.	January 1, 2016
Section 32 Redeployment	s. 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.	Carswell will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.	January 1, 2016

SECTION 5: SUMMARY AND CONCLUSION

Barriers Previously Addressed

Many improvements have been made over the years with regard to physical access, policies, staffing, etc. Some of the more notable items are listed below, but this list is not exhaustive. The progress of accessibility achievements is categorized in accordance with the AODA Standards; however, this list may also reflect accessibility initiatives that may not be specifically prescribed under the AODA regulations. For tracking compliance with AODA regulations, please refer to the chart in section 4 above.

- In 2008, a full review of all HR policies was conducted to determine barriers for employees; employees participated in several focus groups to complete the review; bi-monthly meetings continue with the policy review team to continually assess policy effectiveness
- Carswell's space at 2075 Kennedy Road is rented; however, property management began various upgrades in 2012 to provide greater accessibility for people with disabilities
 - Washroom upgrades began in 2012 and continue
 - Parking lot upgrades were completed in 2013 providing more accessible parking spots
 - In 2013, a "swipe" passcard entry system replaced the previous "card insert" entry system for easier accessibility
- Ergonomic furniture and workstation adaptations are made for staff (as needed, based on request)

In 2014:

- a Steering Committee will be struck to determine next steps to address the Employment Standard
- ongoing training will be provided for all new employees and those returning from long-term leaves; training will be tracked to meet compliance requirements
- further training will be provided by Subject Matter Experts to employees in product development, marketing, IT, content development, etc. to ensure WCAG 2.0 guidelines are understood and are built into new product development for all websites/web-based products
- the second "Accessibility Report" will be filed with AccessOn.ca by December 31, 2014

Next Steps

Further steps will continue to be taken to help Carswell become barrier free, physically, attitudinally, and socially. As such, the Multi-Year Plan presented above reflects a commitment to engage in incremental initiatives in accordance with the AODA and the expectation is that Carswell will be free of attitudinal, physical and social barriers by the year 2025. The process will be meaningful and effective as the organization endorses a consistent approach to barrier removal and prevention.

In 2015:

- a standard accommodation statement was included in all Carswell job postings
- a Third Party Auditor completed a initial audit of one our web based products, WestLawNextCanada. Will follow up at year end to determine how to address gaps.

In 2016:

- a standard accommodation statement has been included in all offer letters.
- all hiring managers and supervisors will be provided with Carswell's new recruitment policies (how to communicate with potential candidates who may require an accommodation during the recruitment process). We will also create "scripts" for hiring managers and supervisors to refer to during the recruitment and selection process.
- next Accessibility report will be filed.

For more information

For more information on this accessibility plan, or to request an alternate format, please contact Carswell's Accessibility Manager at:

- Phone: 1-855-672-5240

- Email: carswell.accessibility@thomsonreuters.com