

## Purpose

Stewart Title Guaranty Company's multi-year accessibility plan outlines the policies and actions that Stewart Title will implement in order to provide inclusive and accessible services to all its customers and employees. This Plan focuses on the steps that Stewart Title will take to comply with Ontario's accessibility laws, including the *Human Rights Code*, as it pertains to disabilities (the "Code"), the *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA") and its *Accessibility Standards Regulation* (Ontario Regulation 191/11), by improving opportunities for people with disabilities and enhancing accessibility in the following areas:

- Information and Communications
- Employment
- Training

## Information and Communications

Stewart Title is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

### Feedback Process

Stewart Title will take the following steps to ensure existing feedback processes are accessible to people with disabilities upon request by **January 1, 2015**:

- Post information about Stewart Title's feedback processes on the company website;
- Allow for feedback in a variety of ways, including in person, by telephone, by writing or via email; and
- Specify the actions that Stewart Title is required to take when complaints are received.

### Public Information

Stewart Title will take the following steps to ensure all publicly available information is made accessible upon request by **January 1, 2016**:

- Consult with the individual to determine his/her accessibility needs;
- Decide on the most appropriate accessible format or communication supports, given the needs of the person with a disability and Stewart Title's capability to deliver;
- Provide the requested information in a timely manner, based on Stewart Title's ability to deliver the requested accessible format or communication support, and at a cost that is no more than the regular price charged to others;
- If Stewart Title determines that it is unable to convert the information or communications into an accessible format, we will explain to the individual requesting the information why we are unable to do so and provide a summary of the content; and
- Notify the public about the availability of accessible formats and communication supports by posting this information on the Stewart Title website;
- Accessible format can include:
  - Accessible electronic formats such as HTML and MS Word;
  - Braille;
  - Accessible audio formats;
  - Large print;

- Text transcripts of visual and audio information;
- Reading the written information aloud to the person directly;
- Exchanging hand-written notes (or providing a note taker or communication assistant);
- Captioning or audio description;
- Assistive listening systems;
- Augmentative and alternative communication methods and strategies such as the use of letter, word or picture boards, and devices that speak out messages;
- Sign language interpretation and intervener services; and
- Repeating, clarifying or restating information

### **Stewart Title Websites**

- Stewart Title will take steps to ensure all new websites and content on those sites conform with WCAG 2.0, Level A by **January 1, 2014**; and
- Stewart Title will take steps to ensure all websites and web content conform with WCAG 2.0, Level AA by **January 1, 2021**.

### **Employment**

Stewart Title is committed to fair and accessible employment practices across all stages of the employment life cycle. This Employment Standard applies to paid employees and Stewart Title will take steps to ensure that the Employment Standard requirements are met by **January 1, 2016**.

#### **Recruitment and Assessment**

Stewart Title will take the following steps to notify the public and staff that, when requested, Stewart Title will accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- Post information regarding the availability of recruitment-related accommodations for disabilities on the Stewart Title website and on job postings;
- Notify job applicants who have been invited to participate in a recruitment, assessment or selection process that, where needed, accommodations for disabilities are available, on request, to support their participation in the process;
- Consult with job applicants who request accommodations to support them during the process; and
- Notify successful applicants of Stewart Title's policies for accommodating employees with disabilities when offering employment.

#### **Individual Accommodation Plans**

Stewart Title will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Consult with the employee to understand the disability and take into account the individual's needs in order to develop an appropriate accommodation plan and/or return-to-work policy;
- Consider how the employee can be involved in the development process of his/her plans;
- Consider how Stewart Title can seek outside medical or other expert evaluation so that effective supports can be provided;

- Consider what steps Stewart Title will take to protect the privacy of personal information;
- Consider how frequently individual accommodation plans will be reviewed and updated, and how this will be done; and
- Follow-up with the employee to ensure that the accommodations that are provided are suitable and effective.

## **Performance Management, Career Development and Redeployment**

We will take the following steps to ensure that the accessibility needs of employees with disabilities are taken into account if Stewart Title is using performance management, career development and/or redeployment processes:

- Consult with employees who have disabilities in order to provide them with the accessible formats and communications supports they require to do their jobs effectively and to be informed of information that is generally available to all employees in the workplace;
- Review the employee's individual accommodation plan to understand the his/her accommodation needs and determine whether it needs adjusting to improve performance on the job;
- Have documents related to performance management, such as performance plans, available in accessible formats, (eg: large print for low vision);
- Provide informal and formal coaching and feedback in a manner that takes into account the employee's disability, (eg: using plain language for an individual with a learning disability); and
- If the employee receives a promotion or if he/she is transferred into a different role, which includes new responsibilities, review the individual accommodation plan to learn what modifications may be needed to accommodate the employee in his/her new position.

## **Accessible Emergency Information**

- Stewart Title will provide its employees with disabilities with individualized emergency response information when necessary.

## **Training**

Stewart Title will provide training to employees, volunteers, and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members.

Stewart Title will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessible laws by **January 1, 2015**:

- Provide training to all employees, volunteers, persons who participate in developing the organization's policies, and all other persons who provide goods, services, or facilities on behalf of Stewart Title;
- Assess the requirements in the regulation against the roles or duties of the persons within the organization;
- Provide training through a separate training program, as part of an orientation session and/or through a larger, office-wide training program;
- Deliver training using handouts, PowerPoint presentations, staff meetings and/or as on-line training modules;
- Provide training on an ongoing basis, such as when new employees join Stewart Title, or when accessibility policies change; and

- Keep records of the individuals who were trained, and the dates that the training was provided;
- Training will include, but not be limited to:
  - Information about achieving accessibility by 2025;
  - Requirements of the Information and Communication Standard and the Employment Standard, as they apply to Stewart Title's business; and
  - Requirements under the Human Rights Code as it pertains to disabilities, and the differences between the Code and the AODA's Integrated Accessibility Standards Regulation.
- Any updates or changes to Stewart Title's accessibility policies will be provided to employees through training, newsletters, emails, staff memos, company website postings and/or staff meetings.

## Summary of Timeline and Requirements

For ease of reference, the following chart summarizes the timeline and goals of Stewart Title's Multi-Year Accessibility Plan, in accordance with AODA's *Accessibility Standards Regulation*.

DATE	ACCESSIBILITY STANDARD	GOAL / REQUIREMENT
January 1, 2014	Information and Communication	New internet websites and web content to conform with WCAG 2.0, Level A
January 1, 2015	Information and Communication	Feedback processes to be made accessible
January 1, 2015	Training	Training to be provided to all employees, volunteers and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities
January 1, 2016	Information and Communication	All publicly available information to be made accessible upon request
January 1, 2016	Employment	Fair and accessible employment practices to be implemented across all stages of employment life cycle
January 1, 2021	Information and Communication	All internet websites and web content to conform with WCAG 2.0, Level AA

**For more information on this Accessibility Plan, please contact:**

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*Accessible formats of this document are available upon request.*