



Under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*, the Government of Ontario has developed a phased-in approach to reaching its objective of making the province of Ontario fully accessible by 2025. This multi-year accessibility plan outlines the actions that RBR will take in order to meet the requirements under the AODA and its regulations.

Statement of Commitment

RBR is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA.

RBR’s Multi-Year Accessibility Plan outlines the overall strategies of how the organization will meet its obligations under the AODA. This Plan and RBR’s Accessibility Policy are available to the public in an accessible format, upon request.

The plan covers the period from 2021 - 2026. It is a living document which will be reviewed annually and updated once every 5 years.

Feedback

We appreciate your feedback on accessibility as it relates to how we provide our goods and services to the people that we serve. Your feedback is important to helping us improve accessible services at RBR. Feedback can be provided in person or by mail to RBR at 359 Terry Fox Drive, Ottawa ON K2K 2E7, via phone at (613) 599-8900 or via email to hr@rbr-global.com.

Multi-Year Accessibility Plan

Initiative	IASR Requirement	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.	<ul style="list-style-type: none">Develop, implement and maintain corporate policy governing how the organization achieves or will achieve accessibility	Completed	01-Jan-14
	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.	<ul style="list-style-type: none">Policy includes corporate statement of organizational commitment to meet accessibility needs of persons with disabilities	Completed	01-Jan-14

	3 (3) Large organizations 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.	<ul style="list-style-type: none"> Policy is available to the public, and available in an accessible format, upon request 	Completed	01-Jan-14
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.	<ul style="list-style-type: none"> Establish, implement and maintain a multi-year accessibility plan which addresses strategies to prevent/remove barriers. Post multi-year plan on website. Review and update plan every 5 years Documents to be available to the public and available in an accessible format, upon request. 	Completed	01-Jan-14
Self-Service Kiosks	6 (2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	<ul style="list-style-type: none"> Incorporate accessibility criteria and features when acquiring or purchasing goods, services or facilities 	n/a	01-Jan-14
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.	<ul style="list-style-type: none"> Ensure that training is provided on the requirements of the accessibility standards within the AODA and the Human Rights Code as it pertains to people with disabilities. 	Completed	01-Jan-15
	7 (2) The training on the requirements of the accessibility standards and on the Human Rights Code referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers and other persons.	<ul style="list-style-type: none"> Training shall be appropriate to the duties of employees, volunteers and other persons. 	Completed	01-Jan-15
	7 (3) Every person referred to in subsection (1) shall be trained as soon as practicable.	<ul style="list-style-type: none"> Training shall be provided as soon as practicable 	Completed	01-Jan-15
	7 (4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis.	<ul style="list-style-type: none"> Training shall be provided on an ongoing basis, as policies are updated. 	Completed	01-Jan-15
	7 (5) Large organizations shall keep a record of the training provided under this section, including the dates on which the	<ul style="list-style-type: none"> A record must be maintained of the training provided, including 	Completed	01-Jan-15

	training is provided and the number of individuals to whom it is provided.	the training dates and the number of people who participated.		
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. (2) Nothing in this section detracts from the obligations imposed under section 7 of Ontario Regulation 429/07 (Accessibility Standards for Customer Service) made under the Act.	<ul style="list-style-type: none"> Provision of accessible formats and communication supports for persons with disabilities must be arranged or provided upon request. 	Completed	01-Jan-15
Accessible Formats and 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.	<ul style="list-style-type: none"> Provision of accessible formats and communication supports for persons with disabilities must be provided or arranged upon request. 	Completed	01-Jan-16
	12 (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> Consult with the person making the request to determine the suitability of an accessible format or communication support. 	Completed	01-Jan-16
	12 (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<ul style="list-style-type: none"> Notify the public about the availability of accessible formats and communication supports. 	Completed	01-Jan-16
	12 (4) Every obligated organization that is required to provide accessible formats or accessible formats and communication supports by section 3, 4, 11, 13, 19, 26, 28, 34, 37, 44 or 64 shall meet the requirements of subsections (1) and (2) but shall do so in accordance with the schedule set out in the referenced section and shall do so only to the extent that the requirements in subsections (1) and (2) are applicable to the requirements set out in the referenced section.		Completed	01-Jan-16
Emergency Procedures, Plans or Public Safety Information	13(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall	<ul style="list-style-type: none"> N/A - Organizations are not required to develop or create new emergency or public safety information. 	Completed	01-Jan-12

	<p>provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.</p> <p>(2) Obligated organizations that prepare emergency procedures, plans or public safety information and make the information available to the public shall meet the requirements of this section by January 1, 2012.</p>	<ul style="list-style-type: none"> Further, organizations are not required to convert this information into accessible formats or provide communication supports if they do not share the information publicly. Some organizations have confidential internal plans, such as those for security lockdowns that are not shared publicly. Create Individualized Emergency Information to employees with disabilities, if applicable 		
Accessible Websites and Web Content	<p>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, and shall do so in accordance with the schedule set out in this section.</p>	<ul style="list-style-type: none"> Make internet websites and web content conform with World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 Level AA. 	Completed	01-Jan-21
	<p>14 (4) Large organizations for their internet websites shall meet the requirements of this section in accordance with the following schedule:</p> <p>1. By January 1, 2014, new internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p>2. By January 1, 2021, all internet websites and web content must conform to 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"> RBR shall re-develop its website to be WCAG 2.0 Level AA compliant by January 1, 2021, other than success criteria 1.2.4 and 1.2.5. 	In Progress	01-Jan-21
	<p>14 (5) Except where meeting the requirement is not practicable, this section applies, to websites and web content, including web-based applications, that an organization controls directly or through a contractual relationship that allows for modification of the product; and to web content published on a website after January 1, 2012.</p>	<ul style="list-style-type: none"> Applies to websites and web content, including web-based applications that an organization controls directly or through a contractual relationship that allows for modification of the product. 	n/a	01-Jan-21
	<p>14 (6) In determining whether meeting the requirements of this section is not practicable, organizations referenced in subsections (1) and (2) may consider, among other things,</p> <p>a) the availability of commercial software or tools or both; and</p>		n/a	01-Jan-21

	b) significant impact on an implementation timeline that is planned or initiated before January 1, 2012.			
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.	<ul style="list-style-type: none"> • RBR will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process by including a statement that accommodation is available through the recruitment process in every job posting, whether such posting is made internally or externally. • RBR will also include this statement on their external internet website under the "Careers" section 	Completed	01-Jan-16
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.	<ul style="list-style-type: none"> • When RBR notifies job applicants that they have been selected to participate further in the recruitment process, RBR advise those job applicants that accommodations are available upon request in relation to the materials or process to be used during the assessment process by including a statement to this effect in its communication to applicants. 	Completed	01-Jan-16
	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.	<ul style="list-style-type: none"> • If a selected applicant requests an accommodation, RBR will 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 individual accessibility needs due to disability. 	Completed	01-Jan-16

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.	<ul style="list-style-type: none"> • When making offers of employment, RBR will notify the successful applicant of its policies for accommodating employees with disabilities by including a statement outlining its policies for accommodating employees in the offer letter or employment contract. • This statement will clearly identify how the successful applicant can gain access to a copy of RBR's policies for accommodating employees with disabilities. 	Completed	01-Jan-16
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.	<ul style="list-style-type: none"> • RBR will inform its employees of its policies used to support its employees with disabilities by posting a statement on its internal shared wiki space. • This will include informing RBR's employees about policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. • Copies of RBR's policies will be available on its internal shared wiki space and will be accessible to its employees. 	Completed	01-Jan-16
	25 (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ul style="list-style-type: none"> • RBR will provide the above information to new employees as soon as practicable after commencing employment 	Completed	01-Jan-16
	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.	<ul style="list-style-type: none"> • RBR shall provide updated information to its employees whenever there is a change to its existing policies on the provision of job accommodation by updating its internal policies 	Completed	01-Jan-16

Accessible Formats and 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.	<ul style="list-style-type: none"> • Upon the request of an employee with a disability RBR will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed to perform the employee's job and information that is generally available to other employees • Examples of accessible formats include, but are not limited to, documents in Braille, large print and electronic documents 	Completed	01-Jan-16
	2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> • In determining the suitability of an accessible format or communication support, RBR will consult with the employee making the request 	Completed	01-Jan-16
Workplace Emergency Response Information	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.	<ul style="list-style-type: none"> • Policy developed 	Completed	01-Jan-12
	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.	<ul style="list-style-type: none"> • Part of the policy, if employee consent is received 	Completed	01-Jan-12
	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.	<ul style="list-style-type: none"> • Part of the policy 	Completed	01-Jan-12
	(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	<ul style="list-style-type: none"> • Part of the policy 	Completed	01-Jan-12

	plans are reviewed; and (c) when the employer reviews its general emergency response policies			
Documented Individual Accommodation Plans	<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> <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 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. <p>28 (3) Individual accommodation plans shall, (a) if requested, include any information regarding accessible formats and communications supports provided, as described</p>	<ul style="list-style-type: none"> • RBR's written process for the development of individual accommodation plans will address: <ul style="list-style-type: none"> ○ The manner in which an employee requesting accommodation can participate in the development of their individual accommodation plan ○ The means by which the employee is assessed on an individual basis ○ The manner in which the employer can request an evaluation by an outside medical or other expert in order to determine if accommodation can be achieved and, if so, how. Any external evaluation will be at RBR's expense. ○ The manner in which the employee can request the participation of a representative from RBR ○ The steps taken to protect the privacy of the employee's medical information ○ How often the individual accommodation plan will be reviewed and updated, and how this update will be accomplished 	Completed	01-Jan-16

	<p>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>	<ul style="list-style-type: none"> ○ The manner in which the reasons for the denial of an individual accommodation plan 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 		
Return to Work Process	<p>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.</p>	<ul style="list-style-type: none"> ● RBR will develop and maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work 	Completed	01-Jan-16
	<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 individual documented accommodation plans, as described in section 28, as part of the process.</p>	<ul style="list-style-type: none"> ● The documented return to work process will outline the steps RBR will take to facilitate the return to work and will include documented individual accommodation plans as part of the process 	Completed	01-Jan-16
	<p>(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>	<ul style="list-style-type: none"> ● RBR's documented return to work process will not replace or override any other return to work process created by or under any other statute 	Completed	01-Jan-16
Performance Management	<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.</p>	<ul style="list-style-type: none"> ● RBR will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management RBR will include a statement on all performance reviews which states that accommodation is 	Completed	01-Jan-16

		available to all employees during the performance review process, including accessible formats and communication supports.		
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.	<ul style="list-style-type: none"> RBR will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when providing career development and advancement to employees 	Completed	01-Jan-16
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"> RBR will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees 	Completed	01-Jan-16

References:

1. Government of Ontario (November 2014). Accessibility for Ontarians with Disabilities Act, 2005, Ontario Regulation 429/07, Accessibility Standards for Customer Service. Retrieved from http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_070429_e.htm.
2. Access Ontario (April 2009). Accessibility Standard for Customer Service, Employer Handbook. Retrieved from http://www.mcsc.gov.on.ca/documents/en/mcsc/accessibility/Tools/AO_EmployerHandbook.pdf.
3. Access Ontario (July 2012). A Guide to the Integrated Accessibility Standards Regulation. Retrieved from http://www.mcsc.gov.on.ca/documents/en/mcsc/accessibility/iasr_guidelines/complete_guidelines.pdf.
4. Access Ontario (July 2012). Integrated Accessibility Standards Regulation Guidelines, Part 2: Information and Communication Standards. Retrieved from http://www.mcsc.gov.on.ca/documents/en/mcsc/accessibility/iasr_guidelines/Part2_IASR_2012.pdf.
5. Access Ontario (July 2012). Integrated Accessibility Standards Regulation Guidelines, Part 3: Employment Standard. Retrieved from <https://www.tiaontario.ca/uploads/Employment%20Standard%20Policy%20Guidelines.pdf>.
6. Global Alliance on Accessible Technologies and Environment (n.d.). Integrated Accessibility Standards Regulation, Developing accessibility policies and a multi-year accessibility plan, A guide for organizations with 50 or more employees. Retrieved from www.gaates.org/documents/ICT/GAATES_Acc_Pol_LB.pdf.
7. Web Accessibility Initiative (WAI). Web Content Accessibility Guidelines (WCAG) Overview. Retrieved from: <https://www.w3.org/WAI/standards-guidelines/wcag/>.