

TAB Products of Canada, Co.

Multi-Year Accessibility Plan,
2013-2021

Annual Progress Report 2016

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Introduction

TAB Products of Canada, Co. is committed to the ongoing identification, removal and prevention of barriers to people with disabilities¹. A barrier is anything that makes it challenging or impossible for a person with a disability to access a service, program or a building. This could include:

- a physical barrier, such as a feature of a building or outdoor space that presents a challenge for a person with a physical disability;
- an information or communications barrier that would make it difficult for a person to easily understand information, such as print that is too small to read; or
- a technological barrier such as a website that does not support screen-reading software.

TAB Products of Canada, Co. employees and Management have worked together toward improving the accessibility of TAB Products of Canada, Co.'s facilities and services and in creating awareness on issues affecting people with disabilities.

This document sets out the work that will be undertaken by TAB Products of Canada, Co. toward implementing the requirements of *Ontario Regulation 191/11 – Integrated Accessibility Standards (IASR)* and other initiatives aimed at removing and preventing barriers to people with disabilities.

This document responds to section 4 of the IASR which requires obligated organizations to develop a multi-year accessibility plan outlining how the requirements of the IASR will be met.

About TAB Products of Canada, Co.

TAB Products of Canada, Co. works to help companies organize, manage and access critical documents and records within a complete records management framework. With more than 60 years of knowledge and experience, TAB Products of Canada, Co. can provide companies the best in records management products and services.

Organized information means lower costs

An organized records management system ensures that only relevant files are maintained, reduces duplication of work, and allows for the smooth transfer of information within an organization.

TAB Products of Canada, Co. can refine records management systems to make it less complicated and more efficient. TAB Products of Canada, Co. helps to reduce storage costs, space requirements and information retrieval time, while lowering overall labor costs.

We can help reduce costs by:

- Improving facilities utilization
- Minimizing off-site storage costs
- Implementing cost avoidance strategies

Accessibility leads to more efficient processes

Lost files, document duplication, and internal information that is difficult to find can slow customer response times and increase operating expenses.

TAB Products of Canada, Co. solutions will ensure that the right information is where it is supposed to be reducing filing errors, improving search times and preventing documents from being misplaced. TAB Products of Canada, Co. helps employees find the information they need, when they need it.

We can work with you to increase operational efficiencies by:

- Providing better access to information
- Sharing organizational knowledge
- Improving business processes

Managed records lowers exposure to risk

TAB Products of Canada, Co. works closely with companies to understand their particular records management challenges. We then map out a plan and implement a customized solution.

In doing so, TAB Products of Canada, Co. helps manage risk and minimize exposure to litigation by developing records retention guidelines for the timely and appropriate disposition of documents.

TAB Products of Canada, Co. provides a complete records management system and ensures that companies are aware of the vital records that require protection.

TAB Products of Canada, Co. can help lower exposure to risk by:

- Providing information on legislative and regulatory compliance
- Reducing information loss
- Developing a vital records disaster recovery plan

¹ For the purposes of TAB Products Canada, Co. the definition of the word “disability” is understood to be that which is identified in the *Ontarians with Disabilities Act, 2001* and the *Accessibility for Ontarians with Disabilities Act, 2005*. The definition in these statutes is taken from the *Ontario Human Rights Code*. This definition can be found in Appendix 1.

Status of Accessibility Legislation in Ontario

Ontarians with Disabilities Act, 2001

In 2001, the Provincial government enacted the *Ontarians with Disabilities Act, 2001 (ODA)*. This Act required organizations within the public sector (the provincial government, municipalities, hospitals, educational institutions and public transportation providers) to undertake activities aimed at reducing and eliminating barriers to people with disabilities. It also required municipalities with populations of over 10,000 to appoint accessibility advisory committees (AAC), develop annual accessibility plans and seek the advice of AACs on certain matters. This was the precursor to the next act, which applies to TAB Products Canada, Co.

Accessibility for Ontarians with Disabilities Act, 2005

In 2005, the Provincial government passed the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*. The AODA requires the development of accessibility standards in a number of areas. Five committees were established by the Provincial government to develop accessibility standards in the following areas: customer service; information and communications; employment; transportation and the built environment. The committees included people with disabilities and representatives of sectors and industries that would be impacted by the standards.

Although the AODA was proclaimed in force in 2005, the ODA was not revoked. The Provincial government has indicated that the ODA will be likely be repealed, however, no definitive timeframe has been provided. As a result, municipalities are still obligated to adhere to the requirements of the ODA.

Ontario Regulation 429-07 – Accessibility Standards for Customer Service

The first Regulation enacted under the AODA was *Ontario Regulation 429-07– Accessibility Standards for Customer Service*. Designated public sector organizations were to be in compliance by January 1, 2010 and all other providers of goods or services by January 1, 2012 and submit a compliance report to the Provincial government by March 31, 2012. Report No. LPS63-09 – *Accessibility Standards under the Accessibility for Ontarians with Disabilities Act, 2005* and Report No. LPS39-10 – *Accessibility for Ontarians with Disabilities Act: Compliance with the Accessibility Standards for Customer Service* set out the steps that TAB Products of Canada, Co. was taking to meet the requirements of the Regulation. TAB Products of Canada, Co. submitted its compliance report to the Province in advance of the deadline indicating it had addressed the requirements of the Regulation and had met its compliance obligations.

Accessible Built Environment Standards

Also being developed are accessibility standards relating to the built environment. The Provincial government recently released, for review and comment, proposed accessibility standards for the design of public spaces. The proposed standards focus on outdoor spaces including recreational trails, beach access routes, outdoor public use eating areas, outdoor play spaces, exterior paths of travel and on and off-street parking. The proposed standards have an

implementation date of 2016 for designated public sector organizations, including municipalities. These standards may be finalized as a Regulation under the AODA next year. Standards associated with the interior of buildings are still being developed and the Provincial government has indicated that they will likely be captured as amendments to the Ontario Building Code. It is unknown when these standards will be issued for public review or enacted.

Recently Enacted Regulatory Requirements

Ontario Regulation 191/11-Integrated Accessibility Standards (IASR)

The IASR was enacted in July 2011. It includes a number of general and specific accessibility requirements in the areas of information and communications, employment and transportation. The requirements have compliance dates ranging from when the IASR was enacted (July 2011) to the year 2021. The requirements apply to the public, private and not for profit sectors. The sections of the IASR that most impact TAB Products of Canada, Co. are those related to accessible information and communications, and employment. As TAB Products of Canada, Co. is not a provider of public transit, the transportation requirements do not apply.

The categories and requirements addressed in the Regulation (except those related to accessible transportation) are summarized below.

General Requirements

- Development of an integrated accessibility standards policy;
- Development of a multi-year accessibility plan;
- Annual reporting on the progress of the multi-year accessibility plan;
- Training staff and volunteers on the requirements of the Regulation and the Ontario Human Rights Code, as it pertains to people with disabilities; and,
- Ensuring that accessibility considerations and features are reflected in procurement processes.

Information and Communications – This section reflects requirements for organizations to create, provide and receive information and communications in ways that are accessible to people with disabilities. The specific requirements include the following:

- Ensuring that feedback processes are accessible, upon request;
- Providing accessible formats and communication supports, upon request;
- Providing publicly available emergency procedure, plans or public safety information in accessible formats, upon request; and,
- Improving the accessibility of websites and web content.

Employment – This section of the IASR requires employers to provide for accessibility across all stages of the employment cycle and integrate accessibility into regular workplace processes. The specific requirements include the following:

- Notifying employees and the public of the availability of accommodation for applicants with disabilities in recruitment and assessment processes;
- Notifying successful applicants of the availability of accommodations;
- Informing employees of policies to provide support to employees with disabilities;
- Providing accessible formats and communication supports for employees with disabilities;
- Providing work place emergency response information to employees with disabilities;
- Establishing processes to develop documented individual accommodation plans;
- Developing a return to work process for employees who have been absent from work due to a disability or who require disability-related accommodations to return to work; and,
- Considering the accessibility needs of employees with disabilities and accommodation plans in performance management processes, when providing career development opportunities or when considering redeployment.

TAB Products Canada, Co. Integrated Accessibility Standards Policy and Multi-Year Accessibility Plan - Development Process

Following the enactment of the IASR, work was undertaken on developing an integrated accessibility standards policy and a multi-year accessibility plan. Both the policy (which was in place by January 1, 2012) and plan are required by the IASR were in place by January 1, 2014.

TAB Products of Canada, Co.'s Integrated Accessibility Standards Policy is currently in process. As required by the IASR, it will include a statement of organizational commitment and sections that set out TAB Products of Canada, Co.'s obligations in relation to accessible information and communications, and employment.

Similarly the TAB Products of Canada, Co.'s Multi-Year Accessibility Plan, was developed to set out the actions the company will take to achieve compliance with the IASR.

The development of TAB Products of Canada, Co.'s Integrated Accessibility Standards Policy and TAB Products of Canada, Co.'s Multi-Year Accessibility Plan was guided by, and is in keeping with, interpretative materials and resources issued by the Accessibility Directorate of Ontario, Ministry of Community and Social Services. In addition, as both documents were being developed information was shared with staff in the Canadian office location.

The following tables set out the actions TAB Products of Canada, Co. will take to address the IASR and achieve compliance and the progress in 2016

Part I - General

This section of the Regulation requires TAB Products of Canada, Co. to:

- **develop accessibility policies and a multi-year accessibility plan**
- **report annually on the progress of the multi-year plan**
- **incorporate accessibility features and considerations in procurement processes**
- **ensure staff and volunteers have been trained on the Integrated Accessibility Standards Regulation and the Ontario Human Rights Code**

Regulatory Compliance	Compliance Deadline	Actions to be Taken	Date Completed
<p>Develop Accessibility Policies</p> <p>Develop</p> <ul style="list-style-type: none"> • Implement and maintain accessibility policies, including a statement of organizational commitment • Make policies publically available 	Jan 1, 2014	<p>Completed - TAB Products of Canada, Co. is currently developing a policy that addresses the requirements in the Integrated Accessibility Standards Regulation (IASR) and includes a statement of organizational commitment.</p> <p>The policy is to be placed on TAB Products of Canada, Co.'s website, once completed and approved.</p>	<p>1st Version posted on Nov 11, 2011.</p> <p>Updated and posted on tab.ca on Feb 14, 2014</p>
<p>Develop a multi-year accessibility plan</p> <ul style="list-style-type: none"> • Establish, implement, maintain and document a multi-year accessibility plan • Post multi-year accessibility plan on website and provide in an accessible format, upon request 	Jan 1, 2014	<p>A multi-year accessibility plan that sets out how TAB Products of Canada, Co. will comply with requirements of IASR has been developed. Once approved it will be placed on TAB Products of Canada, Co.'s website. -</p> <p>Completed</p>	<p>Posted on tab.ca on Feb 14, 2014</p>
<p>Report annually on the multi-year accessibility plan</p> <ul style="list-style-type: none"> • Prepare an annual status report on the progress of measures set out in the multi-year plan • Post annual status report 	Year 2014 and on-going	<p>Annual status report on progress of multi-year accessibility plan will be developed and placed on TAB Products of Canada, Co.'s website and provided in an accessible format upon request.</p>	<p>2014 annual progress report posted on 12/17/2014. 2015 report posted on</p>

on website and provide in an accessible format, upon request			03/16/16. 2016 report to be posted by Dec 31, 2016.
Incorporate accessibility in procuring or acquiring goods, services or facilities <ul style="list-style-type: none"> Incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so 	Jan 1, 2014	Wording in TAB Products of Canada, Co. procurement documents will be reviewed and updated, as required, to reflect requirements of IASR, as needed.	Updated on Jan 30, 2014
Training <ul style="list-style-type: none"> Ensure that training on the IASR and the Human Rights Code as it pertains to persons with disabilities is provided to employees, volunteers, persons who participate in developing policies and others who provide goods, services or facilities on behalf of organization. 	Jan 1, 2014	<p>The Ontario Government has provided training materials to be provided to organizations. They will be applied through e-learning at the website link below:</p> <p>http://www.ohrc.on.ca/en/learning/working-together-ontario-human-rights-code-and-accessibility-ontarians-disabilities-act/code-and-aoda-e-learning-feedback-survey</p> <p>Training will be completed with all employees prior to January 1, 2014.</p>	<p>Customer Service Standard Training completed in Dec 2011.</p> <p>The code and the AODA web trainings completed in Feb 2014.</p>

Part II - Information and Communications Standards

This section of the Regulation includes requirements related to:

- accessible feedback processes
- accessible formats and communication supports
- publically available emergency procedures, plans, public safety information
- accessible websites and web content

Regulatory Requirement	Compliance Deadline	Actions to Be Taken	Date Completed
Feedback processes <ul style="list-style-type: none"> Ensure that processes for 	Jan 1, 2014	TAB Products of Canada, Co's advertisements are being	Feedback form posted

<p>receiving and responding to feedback are accessible to persons with disabilities by providing/arranging for accessible formats and communication supports, upon request</p> <ul style="list-style-type: none"> • Notify the public about the availability of accessible formats and communication supports 		<p>updated to include wording that asks customers/potential customers to advise if they require accommodation. The next round of printing will include a statement of the organization's statement of organizational commitment.</p> <p>Existing feedback processes and wording on TAB Products of Canada, Co.'s website on the availability of accessible documents to be reviewed and updated, as required.</p>	<p>on tab.ca in Dec 2011. Reviewed in July 2014.</p>
<p>Accessible formats and communication supports</p> <ul style="list-style-type: none"> • Upon request, provide for provision of accessible formats and communication supports for persons with disabilities • Notify the public about the availability of accessible formats and communication supports 	<p>Jan 1, 2015</p>	<p>Already existing procedures regarding documents in alternate formats will be reviewed to determine if they require updating based on the IASR.</p> <p>Wording on TAB Products of Canada, Co.'s website on the availability of accessible formats will be reviewed and updated as required.</p>	<p>Completed Feb 2014</p>
<p>Emergency procedures, plans or public safety information</p> <ul style="list-style-type: none"> • Provide emergency procedures, plans or public safety information, that are available publicly, in an accessible format or with appropriate communication supports, upon request. 	<p>Jan 1, 2012</p>	<p>Completed – documents provided in alternate formats, upon request.</p>	
<p>Accessible websites and web content</p> <ul style="list-style-type: none"> • Websites and web 	<p>Jan 1, 2021</p>	<p>TAB Products of Canada, Co.'s website will be reviewed for accessibility and changes will be</p>	

<p>content to conform to WCAG 2.0 Level AA</p>		<p>made accordingly as required.</p> <p>An accessibility tool checker may be used on TAB Products of Canada, Co.'s website to identify accessibility issues.</p> <p>Efforts are ongoing to educate and network with staff on creating accessible documents for TAB Products of Canada, Co.'s website.</p> <p>Staff are reviewing resources provided by the Ontario Government on making accessible websites.</p>	
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Part III – Employment Standards

This section of the Regulation includes requirements related to:

- **recruitment, assessment and selection**
- **accessible formats and communication supports for employees**
- **workplace emergency response**
- **return to work processes**
- **performance management, career development and redeployment**

Regulatory Requirement	Compliance Deadline	Actions To Be Taken	Date Completed
<p>Recruitment</p> <ul style="list-style-type: none"> • Notify employees and the public about the availability of accommodation for applicants with disabilities in recruitment process • Notify job applicants when selected to participate in an assessment or selection process that accommodations are 	<p>Jan 1, 2014</p>	<p>Wording on TAB Products of Canada, Co.'s website (Employment Opportunities page) and in job postings will be updated to reflect what applicants are to do should they require accommodation due to a disability.</p> <p>Human Resource staff to advise individuals who are selected to participate in interviews of the availability of accommodations, if</p>	<p>Completed in Feb 2014</p>

<p>available</p> <ul style="list-style-type: none"> When making an offer of employment, notify successful applicants of policies for accommodating employees with disabilities 		<p>requested. A statement notifying successful applicants of policies for accommodating employees with disabilities will be added to offer letters or reiterated verbally if the offer is made in person or by telephone.</p>	
<p>Informing employees of supports</p> <ul style="list-style-type: none"> Inform employees of policies to support employees with disabilities 	<p>Jan 1, 2014</p>	<p>New employees will be advised of policies in place to support employees with disabilities, as soon as possible after they begin employment. These include the Equal Opportunity Employer policy and accessibility policies currently in existence. Existing employees will be advised of changes to policies through a variety of methods, including a review of TAB Products of Canada, Co.'s accessibility policies.</p> <p>This requirement will also be addressed in IASR staff training program.</p>	
<p>Accessible formats and communication supports for employees</p> <ul style="list-style-type: none"> When requested by an employee with a disability, employers shall provide or arrange for the provision of accessible formats and communication supports for information needed to perform employee's job and information generally available to employees in Workplace 	<p>Jan 1, 2014</p>	<p>This requirement will be reflected in IASR policy and addressed in IASR staff training program.</p>	
<p>Workplace emergency</p>	<p>Jan 1, 2012</p>	<p>Completed – A process has</p>	

<p>response information</p> <ul style="list-style-type: none"> • Provide individualized workplace emergency response information to employees who have a disability, as required 		<p>been put in place for employees to self-identify so that a workplace emergency response plan can be developed.</p>	
<p>Documented individual accommodation plans</p> <ul style="list-style-type: none"> • Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities 	<p>Jan 1, 2014</p>	<p>TAB Products of Canada, Co.'s existing Work Accommodation Policy (part of Employment Equity Policy) will be reviewed and updated, as required.</p>	
<p>Return to work process</p> <ul style="list-style-type: none"> • Develop and have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodations to return to work 	<p>Jan 1, 2014</p>	<p>A return to work process guide will be developed. - Completed</p>	<p>Included in STD policy and posted on Jan 30, 2014</p>
<p>Performance management, career development and redeployment</p> <ul style="list-style-type: none"> • Take into account accessibility needs of employees with disabilities and individual accommodation plans as part of performance management processes, when providing career development opportunities and considering redeployment. 	<p>Jan 1, 2014</p>	<p>TAB Products of Canada, Co. currently does not maintain a performance management system. As one is developed, existing policies associated with career development and redeployment will be reviewed and updated, as required.</p> <p>IASR policy will reflect requirements for performance management, career development and redeployment.</p>	

Next Steps

The development of TAB Products of Canada, Co.'s Integrated Accessibility Standards Policy and Multi-Year Accessibility Plan are just two of the many actions that are required by the IASR. TAB Products of Canada, Co. staff will continue to work toward meeting the additional requirements of the IASR and undertake other activities aimed at eliminating barriers. They include the following:

- meeting the requirements of the IASR associated with training and accessible employment;
- developing an annual update on the Multi-Year Accessibility Plan, as required by the IASR;
- reviewing existing accessibility procedures and updating them, as required;
- continuing to share information and network with TAB Products of Canada, Co. employees to ensure all accessibility barriers are eliminated.

The Multi-Year Accessibility Plan has been approved and placed on the website. The plan will also be made available in alternate formats, upon request.

APPENDIX 1

Definition of Disability

The definition of disability that appears in the *Ontarians with Disabilities Act, 2001* and in the *Accessibility for Ontarians with Disabilities Act, 2005* is the same as that which is used in the *Ontario Human Rights Code*.

For the purposes of this document, the term “disability” is taken from the provincial statutes mentioned above and is defined as follows:

- a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- b) a condition of mental impairment or a developmental disability;
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d) a mental disorder; or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.