

SABA SOFTWARE (CANADA) INC. (“SABA”)

MULTI-YEAR ACCESSIBILITY PLAN

Introduction

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 Saba will take in order to meet the requirements under the AODA and its regulations.

Statement of Commitment

Saba is committed to creating and maintaining an equitable and integrated environment whereby every employee receives equal opportunity with respect to employment and receives accommodation where required, in accordance with the provisions of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and the *Integrated Accessibility Standards Regulation (191/11)* (the “IAS”).

As outlined in the *Accessibility Standards for Customer Service* (the “ASCS”), Saba is committed to providing access to our facilities and delivering excellent customer service at all times for clients and visitors, and in a way that respects the dignity and independence of people with disabilities.

The ASCS, the IAS and the Employment Standards (ES)

The following outlines the steps and actions that Saba has taken or will take to prevent and remove barriers and meet its obligations under the ASCS, the IAS and the ES.

Multi-Year Accessibility Plan

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
Part 1 - General Requirements				
3. Establishment of Accessibility Policies	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.	Develop policy for ASCS; revise and update to include IASR requirements.	Complete	January 1, 2014
4. Accessibility Plans	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.	Develop multi-year accessibility plan. Post multi-year accessibility plan on external website, and provide the plan in an accessible format upon request.	Complete	January 1, 2014
6. Self-service Kiosks	Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	Not Applicable. Continue to monitor if future plans include kiosks.	N/A	January 1, 2014
7. 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.	Develop and implement training program. Conduct on-line training program and track employee completion.	Complete	January 1, 2015
Part 2 - Information and Communications Standards				
11. Feedback	11. (1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to	Review processes for receiving and responding to customer feedback with applicable parties within the organization to ensure that information is provided in	Complete	January 1, 2015

	persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.	an accessible format and that communication supports are available upon request.		
12. Accessible Formats & Communications 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.	Review accessibility status of IT systems and tools required for use by employees to determine potential requirements for use of assistive technology. Review and document procedures for providing employee accommodation. Formalize procedures for teams engaging with external parties to ensure the provision of accessible formats and communications supports are available upon request.	Complete	January 1, 2016
	(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Review procedures for managing requests for accessible formats or communications supports to ensure it accounts for direct consultation with the person making the request. Formalize the procedure for responding to the requestor, including provisions for approving or declining the request.	Complete	January 1, 2016
	(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Provide notification on website and on applicable external documents that accessible formats are available upon request.	Complete	January 1, 2016
13. Emergency Procedure, 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 provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	Formalize emergency procedures for employees (individualized emergency evacuation plans) and visitors with disabilities across all Saba properties in Ontario.	Complete	January 1, 2012

14. Accessible Websites and Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	Communicate revised guidelines to applicable internal teams. Conduct an evaluation of existing web properties to determine required updates. Conduct remediation on existing sites.	Complete	1. By January 1, 2014, new internet websites and web content on those sites must conform with WCAG 2.0 Level A.
		Ongoing remediation of existing sites as they undergo updates to ensure compliance with AODA.	In Progress	2. By 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).
Part 3 - Employment Standards				
22. 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.	Include a notice on both internal and external recruitment sites/ postings to notify employees and the public about the availability of accommodation for applicants with disabilities during the recruitment process.	Complete	January 1, 2016
23. 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. (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.	Include a notice indicating availability of accommodations upon request for potential candidates selected for assessment during the recruiting process. Ensure recruitment process includes a mechanism to consult with the applicant requesting an accommodation to ensure it takes into account the applicant's accessibility needs.	Complete	January 1, 2016

24. 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.	Include a statement in offers of employment that notifies the successful applicant of the website location of corporate policies for accommodating employees with disabilities.	Complete	January 1, 2016
25. 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.	Develop and implement a communication strategy for informing employees of the corporate policies for supporting employees with disabilities.	Complete	January 1, 2016
	25. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Communicate accessibility policies and processes to new employees as part of their new hire training.	Complete	January 1, 2016
	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.	Develop a process to communicate to employees any changes to existing policies concerning job accommodations due to disability.	Complete	January 1, 2016
26. 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.	Review existing job accommodation assessment process to ensure it includes provisions for accessible formats and communications supports for information required by the employee. Educate employees and managers on the availability of and process for requesting accessible formats and communication supports.	Complete	January 1, 2016
	(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Review existing job accommodation assessment process to ensure it includes the means for determining the suitability of an accessible format or communication support requested by an employee.	Complete	January 1, 2016

27. 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.	Implement a process for the development of individualized emergency response plans for employees as required.	Complete	January 1, 2012
	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.	Ensure process for the development of an individualized emergency response plan includes a mechanism to obtain consent from the employee to share the plan with the person designated to provide the employee with assistance.	Complete	January 1, 2012
	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.	The process for development of the individualized emergency response plan will factor in that the plan shall be developed as soon as possible upon receipt of the request.	Complete	January 1, 2012
	(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.	The process for development of the individualized emergency response plan will factor in any necessary reviews that must occur upon a change in the employee's location or accommodation needs, and upon review of the corporate emergency response policies.	Complete	January 1, 2012
28. Documented Individual Accommodation Plans	28. (1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. (2) The process for the development of documented individual accommodation plans shall include the following elements: 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an	Review current process for employees to be able to request an individual accommodation plan. Ensure the documented process for the development of the individual accommodation plan includes all applicable considerations for the employee as outlined in the AODA requirements	Complete	January 1, 2016

	<p>evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, 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.</p> <p>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>			
29. 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. (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 documented individual accommodation plans, as described in section 28, as part of the process. (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>	<p>Review the existing documented Return to Work Process to ensure it accounts for employees who have been absent from work due to a disability, and includes applicable individualized disability-related accommodations upon their return.</p>	Complete	January 1, 2016
30. 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</p>	<p>Review the performance management program to ensure it takes into account the accessibility needs of</p>	Complete	January 1, 2016

	with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	employees with disabilities, including individual accommodation plans.		
31. 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.	Ensure that the accessibility needs of employees with disabilities as well as any individual accommodation plans are factored into career development and advancement considerations.	Complete	January 1, 2016
32. 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.	Ensure that the accessibility needs of employees with disabilities as well as any individual accommodation plans are factored into redeployment considerations.	Complete	January 1, 2016