BlackBerry Multi-Year Accessibility Plan

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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. BlackBerry strongly supports this important objective and this multi-year accessibility plan outlines the actions that BlackBerry Limited and its subsidiaries with at least one employee in Ontario (BlackBerry) are committed to taking in order to achieve this objective and to meet the requirements under the AODA and its regulations.

Statement of Commitment

BlackBerry Limited and its subsidiaries ("BlackBerry") are committed to working to improve access and opportunities for people with disabilities by identifying, removing, and preventing barriers that might interfere with their ability to make full use of our products and services.

BlackBerry strives to offer quality products and services to each member of the community and to provide these products and services in a way that respects the dignity and independence of people with disabilities. BlackBerry is committed to open communication and to ensuring that persons with disabilities have equal opportunity access.

Policies and Actions Concerning the Integrated Accessibility Standards

BlackBerry has developed policies and implemented programs to fulfill its obligations outlined under the Integrated Accessibility Standards, (Ontario Regulation 191/11) (IASR), as well as under the original Accessibility Standards for Customer Service (Ontario Regulation 429/07) (ASCS), which was incorporated within the IASR in force as of July 1, 2016.

The following outlines the steps and actions that BlackBerry has taken or will take to prevent and remove barriers and meet its obligations under the current IASR which now incorporates the original ASCS.

Multi-Year Accessibility Plan

Integrated Accessibility Standards, ON Regulation 191/11

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
Part 1 - Genera	Requirements			·
3. Establishment of Accessibility Policies	 (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. (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. (3) Every obligated organization shall, (a) prepare one or more documents describing the policies it developed under subsection (1); and (b) make the documents publicly available and, on request, provide them in an accessible format. 	Develop policy covering all aspects of revised IASR requirements, including the Customer Service Standards obligations and a statement of organizational commitment. Post policy on external website.	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.	Establish an AODA Governance Framework and cross-functional team to review and assess IASR obligations regarding preventing and removing barriers. Develop an AODA Program Roadmap and initiate projects to address respective aspects of AODA obligations. Establish a periodic review and update cycle for strategy, policies and plans. 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 the use of self-service kiosks.	N/A	January 1, 2014

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
7. Training Part 2 - Informa	 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. (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. (3) Every person referred to in subsection (1) shall be trained as soon as practicable. (4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis. (5) Every large organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided. 	Develop and implement training program for the Customer Service Standards obligations for all applicable employees Develop training program to cover the obligations outlined in the IASR. Develop a list of all applicable employees requiring training based on their functional responsibilities and location. Conduct on-line training program and track employee completion. Integrate into ongoing training programs for current and new employees.	Complete	January 1, 2015
11. 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 the provision of accessible formats and communications supports, upon request. (2) The organization shall notify the public about the availability of accessible formats and communications supports with respect to the feedback process. 	Review processes for receiving and responding to customer feedback with applicable parties within the organization to ensure that information is provided in an accessible format and that communication supports are available upon request.	Complete	January 1, 2015
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

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
	(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.	Complete	January 1, 2016
		Formalize the procedure for responding to the requestor, including provisions for approving or declining the request.		
	(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 BlackBerry 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.	Review and updated Web Design Guidelines to account for AODA obligations. Communicate revised guidelines to applicable internal teams and to external agencies developing web content. Procure web accessibility testing software and conducted training for applicable teams. Conduct an evaluation of existing web properties to determine required updates. Conduct remediation on existing sites and establish procedures to integrate web accessibility considerations into future site development.	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 WCAG 2.0 Level AA.	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).

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
Part 3 - Employı	ment 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

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
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 	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

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
29. Return to Work Process	 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 assist the employer in determining if accommodation can be achieved and, if so, how 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. 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. 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. (c) The return to work process referenced in this section dees not replace or override any other return to work process created by or under any other statute. 	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.	Complete	January 1, 2016
30. Performance Management	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.	Review the performance management program to ensure it takes into account the accessibility needs of employees with disabilities, including individual accommodation plans.	Complete	January 1, 2016

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
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

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
Part IV.2 – Cust	omer Service Standards			
80.46. Establishment of Policies	(1) In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities.	Develop policy for Customer Service Standards, including statement of organizational commitment; revise and update to include IASR requirements.	Complete	January 1, 2012
	(2) The provider shall use reasonable efforts to ensure that the policies are consistent with the following principles:	Post policy on external website.		
	1. The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities.			
2. The pr persons v the provis others, un necessar permaner disability services o 3. Person opportuni	2. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities.			
	3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities.			
	4. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability.			
	(3) Without limiting subsections (1) and (2), the policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from the goods, services or facilities or with the availability of other measures, if any, which enable them to do so.			
	(4) Every provider, other than a small organization, shall prepare one or more documents describing the policies established under this section and, on request, shall give a copy of any such document to any person.			
	(5) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (4) are available on request.			
given by posting the informat place on premises owned or provider, by posting it on the	(6) The notice required by subsection (5) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.			
80.47 Use of Service Animals and Support Persons	(1) This section applies if goods, services or facilities are provided to members of the public or other third parties at premises owned or operated by the provider and if the public or third parties have access to the premises.	Incorporate obligations for Use of Service Animals and Support Persons into the overall BlackBerry Accessibility Policy.	Complete	January 1, 2012
	(2) If a person with a disability is accompanied by a guide dog or other service animal, the	Post policy on external website.		

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
	provider shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises.			
	(3) If a service animal is excluded by law from the premises, the provider shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities.			
	(4) If a person with a disability is accompanied by a support person, the provider shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.			
	(5) The provider may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, the provider determines that,			
	(a) a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and			
	(b) there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.			
	(6) If an amount is payable for a person's admission to the premises or in connection with a person's presence on the premises, the provider shall ensure that notice is given in advance about the amount, if any, payable in respect of the support person.			
	(7) If, under subsection (5), the provider requires a person with a disability to be accompanied by a support person when on the premises, the provider shall waive payment of the amount, if any, payable in respect of the support person's admission to the premises or in connection with the support person's presence on the premises.			
	(8) Every provider, other than a small organization, shall prepare one or more documents describing its policies with respect to the matters governed by this section and, on request, shall give a copy of any such document to any person.			
	(9) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (8) are available on request.			
	(10) The notice required by subsection (9) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.			

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
80.48 Notice of Temporary Disruptions	 (1) If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public. (2) Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available. (3) Every provider, other than a small organization, shall prepare a document setting out the steps that the provider will ensure are taken in connection with a temporary disruption and, on request, shall give a copy of the document to any person. (4) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (3) is available on request. (5) The notices required by subsections (2) and (4) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. 	Incorporate obligations for Notice of Temporary Disruptions into the overall BlackBerry Accessibility Policy. Post policy on external website.	Complete	January 1, 2012
80.49 Training for Staff	 In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities: Every person who is an employee of, or a volunteer with, the provider. Every person who participates in developing the provider's policies. Every other person who provides goods, services or facilities on behalf of the provider. The training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters: How to interact and communicate with persons with various types of disability. How to interact of a support person. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability. 	Provide training to all applicable employees, volunteers and service providers concerning the accessibility policies and processes that are in place. Incorporate obligations for Training of Staff into the overall BlackBerry Accessibility Policy. Post policy on external website.	Complete	January 1, 2012

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
	 (3) Every person referred to in subsection (1) shall be trained as soon as practicable. (4) Every provider shall also provide training on an ongoing basis in respect of any changes to the policies described in section 80.46. (5) Every provider, other than a small organization, shall keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided. (6) Every provider, other than a small organization, shall, (a) prepare a document that describes its training policy, summarizes the content of the training and specifies when the training is to be provided; and (b) on request, give a copy of the document to any person. (7) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (6) is available on request. (8) The notice required by subsection (7) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. 			
80.50 Feedback Process Required	 (1) Every provider shall establish a process for receiving and responding to, (a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and (b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3). (2) The feedback process must specify the actions that the provider will take if a complaint is received about the manner in which it provides goods, services or facilities to persons with disabilities. (3) Every provider shall ensure that the feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request. (4) Every provider shall make information about the feedback process readily available to the public. (5) Every provider, other than a small organization, shall prepare a document describing the feedback process and, on request, shall give a copy of the document to any person. (6) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the 	Review processes for receiving and responding to customer feedback with applicable parties within the organization to ensure that it is accessible to persons with disabilities and meets the requirements outlined within this provision. Incorporate obligations for a Feedback Process into the overall BlackBerry Accessibility Policy. Post policy on external website.	Complete	January 1, 2012

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
	 document required by subsection (5) is available on request. (7) The notice required by subsection (6) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. 			
80.51 Format of Documents	(1) If a provider is required by this Part to give a copy of a document to a person with a disability, the provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support,	Review processes for providing documents in alternate formats or with communication supports upon request to ensure that they adhere to the requirements outlined within this provision.	Complete	January 1, 2012
	 (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. (2) The provider shall consult with the person making the request in determining the suitability of an accessible format or communication support. 			