

## AODA – Multi-Year Accessibility Plan for the Integrated Accessibility Standards Regulation (IASR)

This accessibility plan outlines the policies and actions that Crawford Packaging will put in place to improve opportunities for people with disabilities in accordance with the requirements communicated under the Integrated Accessibility Standards, Ontario Regulation 191/11. *This Plan will be posted on our website and will be updated every 5 years at a minimum.*

### Statement of Commitment

Crawford Packaging believes in equal opportunity and is committed to providing a barrier-free environment that allows all people to maintain their independence and dignity. As an organization, we respect and uphold the requirements set forth under the *Accessibility for Ontarians with Disabilities Act (2005)* and its associated Regulations and strive to meet the needs of individuals with disabilities in a timely and effective manner.

### General Requirements

<b>Accessibility Requirement:</b> <u>Establishment of accessibility policies</u>		<b>Compliance Deadline:</b> January 1, 2013	
<b>Current Barriers:</b> None currently			
<b>Plan to Meet Requirements:</b> Policies have been written and communicated to employees. AODA training is included in new hire orientation, and trained annually in our health and safety training.			
<b>Potential Future Barriers:</b> None noted			
<b>Responsible Authority:</b> HR		<b>Results:</b> Completed	
<b>Accessibility Requirement:</b> <u>Training on IASR and the <i>Human Rights Code</i></u>		<b>Compliance Deadline:</b> January 1, 2014	
<b>Current Barriers:</b> None noted			
<b>Plan to Meet Requirements:</b>  Employees have been trained. New employees receive their training during the onboarding process with HR. Refresher Training completed May/June 2022.			
<b>Potential Future Barriers:</b> None noted			
<b>Responsible Authority:</b> HR		<b>Results:</b> Completed and Ongoing for new employees	

## Information and Communication Standard

Crawford Packaging is committed to making our information and communications accessible to people with disabilities.

**Accessibility Requirement:**

Feedback Process

**Compliance Deadline:**

January 1, 2014

**Current Barriers:** None currently

**Plan to Meet Requirements:**

There are folders at the front desk of all 3 locations with feedback forms specifically regarding our good/services and accessibility. They are also available on our website.

**Potential Future Barriers:** None noted

**Responsible Authority:** HR

**Results:** Completed

**Accessibility Requirement:**

Accessible Formats and Communication  
Supports

**Compliance Deadline:**

January 1, 2014

**Current Barriers:** None noted

**Plan to Meet Requirements:**

If requested, we can provide a communication in another format based on the person's needs. Employees have been trained to know this must be provided if requested.

**Potential Future Barriers:**

If a format is requested that is not readily available, we can work with the individual to get them the information in a way that works for their disability.

**Responsible Authority:** EE's who receive a request and HR

**Results:** Completed

**Accessibility Requirement:**

Emergency procedures, plans, or public safety  
information

**Compliance Deadline:**

January 1, 2012

**Current Barriers:** None noted

**Plan to Meet Requirements:** There is an emergency procedure posted near the front door at all 3 locations

<b>Potential Future Barriers:</b> None noted	
<b>Responsible Authority:</b> HR	<b>Results:</b> Completed
<b>Accessibility Requirement:</b> <u>Accessible websites and web content</u>	<b>Compliance Deadline:</b> WCAG 2.0 Level A January 1, 2014 WCAG 2.0 Level AA January 1, 2021
<b>Current Barriers:</b> No current barriers.	
<b>Plan to Meet Requirements:</b> WCAG 2.0 Level AA compliance met with accessiBe software.	
<b>Potential Future Barriers:</b> If accessiBe or Squarespace experiences an outage we will experience challenges with accessibility, any challenges faced will not be permanent as we have resources to troubleshoot issues.	
<b>Responsible Authority:</b> Marketing/IT	<b>Results:</b> Full control over the entire website and make the necessary changes to meet compliance.
<b>Accessibility Requirement:</b> <u>Educational and Training Resources or Materials and Educators</u>	<b>Compliance Deadline:</b> January 1, 2013
<b>Current Barriers:</b> None noted	
<b>Plan to Meet Requirements:</b> Training is done in house and accommodation can be provided upon request for accessible materials.	
<b>Potential Future Barriers:</b> None noted	
<b>Responsible Authority:</b> HR	<b>Results:</b> Can be completed upon request

## Employment Standard

Crawford Packaging is committed to fair and accessible employment practices.

**Accessibility Requirement:**

Recruitment, Assessment, and Selection  
Processes

**Compliance Deadline:**

January 1, 2016

**Current Barriers:** None noted

**Plan to Meet Requirements:**

Job postings state that accommodations for applicants with disabilities are available upon request. When a candidate is called for an interview they are asked if they need any accommodation to support their participation in the interview process. We also state in our offer letters that accommodation is available throughout their employment if requested.

**Potential Future Barriers:** None noted

**Responsible Authority:** HR

**Results:** Completed thus far and ongoing

**Accessibility Requirement:**

Informing Employees of Supports

**Compliance Deadline:**

January 1, 2016

**Current Barriers:** None noted

**Plan to Meet Requirements:**

We have an IASR Employment Policy that has been written and communicated to our employees stating that Crawford packaging will accommodate an employee when requested. We also train all new employees in AODA and IASR/Human Rights talking about providing employees with anything they require as a result of a disability. Refresher AODA training was completed July/August 2020 for all employees.

**Potential Future Barriers:** None noted

**Responsible Authority:** HR

**Results:** Completed and Ongoing

**Accessibility Requirement:**

Accessible formats and communication  
supports for employees

**Compliance Deadline:**

January 1, 2016

**Current Barriers:** None noted

<b>Plan to Meet Requirements:</b>  We can provide these accessible formats if requested which is communicated during onboarding through training and it's stated in our Policies.	
<b>Potential Future Barriers:</b> None Noted	
<b>Responsible Authority:</b> HR	<b>Results:</b> Completed and Ongoing
<b>Accessibility Requirement:</b>  <u>Workplace Emergency Response Information</u>	<b>Compliance Deadline:</b>  January 1, 2012
<b>Current Barriers:</b> None noted	
<b>Plan to Meet Requirements:</b>  There is no need for this accommodation currently, but we can create one if needed in the future for those that request it or for whom Crawford is aware of the need for accommodation due to a disability.	
<b>Potential Future Barriers:</b> None noted	
<b>Responsible Authority:</b> HR & Manager	<b>Results:</b> Completed
<b>Accessibility Requirement:</b>  <u>Documented individual accommodation plans</u>	<b>Compliance Deadline:</b>  January 1, 2016
<b>Current Barriers:</b> None noted	
<b>Plan to Meet Requirements:</b>  If requested we will create a plan that will include the employee participation, seek outside advice if needed, protect the employee's information and review the plan annually or when needed.	
<b>Potential Future Barriers:</b> None noted	
<b>Responsible Authority:</b> HR	<b>Results:</b> Completed
<b>Accessibility Requirement:</b>  <u>Return to Work Processes</u>	<b>Compliance Deadline:</b>  January 1, 2016
<b>Current Barriers:</b> None noted	

<b>Plan to Meet Requirements:</b>  We have a Return to Work Policy stipulating we will support employees with RTW and what everyone's responsibilities are throughout the process. We have gone through this process several times.	
<b>Potential Future Barriers:</b> None noted	
<b>Responsible Authority:</b> HR	<b>Results:</b> Completed and will continue moving forward
<b>Accessibility Requirement:</b>  <u>Performance Management Process</u>	<b>Compliance Deadline:</b>  January 1, 2016
<b>Current Barriers:</b> None noted	
<b>Plan to Meet Requirements:</b>  Any individual accommodation plans, or accessibility needs will be taken into consideration when completing performance reviews, up until this point none have been required/requested.	
<b>Potential Future Barriers:</b> None noted	
<b>Responsible Authority:</b> HR	<b>Results:</b> Completed and Ongoing
<b>Accessibility Requirement:</b>  <u>Career Development and Advancement</u>	<b>Compliance Deadline:</b>  January 1, 2016
<b>Current Barriers:</b> None noted	
<b>Plan to Meet Requirements:</b>  Crawford packaging will ensure that a person's disability or accommodation needs do not get in the way of them advancing in their career	
<b>Potential Future Barriers:</b> None noted at this time	
<b>Responsible Authority:</b> HR & Mngmt.	<b>Results:</b> Completed and Ongoing

## Design of Public Spaces

Crawford Packaging will meet accessibility laws when building or making major changes to public spaces.

**Accessibility Requirement:**

Make exterior paths of travel accessible

**Compliance Deadline:**

January 1, 2017

**Current Barriers:** None noted

**Plan to Meet Requirements:**

There is a ramp and a path wide enough to get to our front doors that is wheelchair accessible. Also, we have the required number of clearly marked parking spaces that meet all requirements.

**Potential Future Barriers:** None noted

**Responsible Authority:** Property/Company Owner and HR

**Results:** Completed

**Accessibility Requirement:**

Making parking Accessible

**Compliance Deadline:**

January 1, 2017

**Current Barriers:** None noted

**Plan to Meet Requirements:**

Essex: There are 21 parking spots with 2 at the front being wheelchair accessible. There is a gap in between the two spots big enough for a wheelchair.

**Potential Future Barriers:** None noted

**Responsible Authority:** Property/Company Owner

**Results:** Completed

**Accessibility Requirement:**

Making Service Counters and Waiting areas accessible

**Compliance Deadline:**

January 1, 2017

**Current Barriers:** None noted

**Plan to Meet Requirements:**

There is room in our sitting area at the front entrance for a wheelchair and a counter that is wheelchair accessible. There are also chairs available to sit on.

<b>Potential Future Barriers:</b> None noted	
<b>Responsible Authority:</b> Property/Company Owner	<b>Results:</b> Completed
<b>Accessibility Requirement:</b> <u>Temporary disruptions regarding Accessible Elements in Public Spaces</u>	<b>Compliance Deadline:</b> January 1, 2020
<b>Current Barriers:</b> Note noted	
<b>Plan to Meet Requirements:</b> <p>The accessible parts of our public parking spaces are maintained by a third party and internally when required. More frequent maintenance in the winter (daily) than in the summer (weekly), in order to keep barrier-free paths of travel free of snow</p> <p><i>Waiting area:</i>            Ensuring that movable objects, including furniture, do not impede access to operating mechanisms such as light switches, or door hardware, which could prevent some people with disabilities from using them            Maintaining ground and floor surfaces at entrances during inclement weather to prevent slipping.</p>	
<b>Potential Future Barriers:</b>  None noted.	
<b>Responsible Authority:</b> Property/Company Owner	<b>Results:</b> Completed and Ongoing
<b>Accessibility Requirement:</b> <u>Maintain the accessible parts of your public spaces</u>	<b>Compliance Deadline:</b> January 1, 2020
<b>Current Barriers:</b> None noted	
<b>Plan to Meet Requirements:</b> <p>Any disruption of accessible parts of its public spaces for maintenance or service will be confined to non-business hours. In the event of a service disruption during business hours, Crawford Packaging will notify the public as soon as reasonably possible of the service disruption and available alternatives.</p>	
<b>Potential Future Barriers:</b>  None noted	
<b>Responsible Authority:</b> Property/Company Owner	<b>Results:</b> Completed and Ongoing



## Customer Service Standards

Crawford Packaging is committed to providing accessible customer service to people with disabilities. This means that we will provide goods, services and customer service (in person, email or phone) to people with disabilities with the same high quality and timeliness as others.

**Accessibility Requirement:**

Develop, implement, and maintain policies regarding the provisions of goods, services, or facilities to persons with disabilities

**Compliance Deadline:**

January 1, 2012

**Current Barriers:** None noted

**Plan to Meet Requirements:**

Policies are in place and have been communicated to employees

**Potential Future Barriers:** None noted

**Responsible Authority:** HR

**Results:** Completed

**Accessibility Requirement:**

Ensure that a person with a disability is permitted to enter the premises with their service animal with them (unless excluded by law)

**Compliance Deadline:**

January 1, 2012

**Current Barriers:** None noted

**Plan to Meet Requirements:**

This requirement has been communicated to staff through policies and through training and will continue to be during onboarding of new employees. A service animal is permitted to go anywhere the customer is permitted to go.

**Potential Future Barriers:** None noted

**Responsible Authority:** HR

**Results:** Completed and Ongoing

**Accessibility Requirement:**

Ensure that a person with a disability and their support person are permitted to enter the premises together and that the person with the disability is not prevented from having access to that support person

**Compliance Deadline:**

January 1, 2012

**Current Barriers:** None noted

<b>Plan to Meet Requirements:</b>	
This requirement has been communicated to staff through policies and through training and will continue to be through the onboarding process of new hires	
<b>Potential Future Barriers:</b> None noted at this time	
<b>Responsible Authority:</b> HR	<b>Results:</b> Completed and ongoing
<b>Accessibility Requirement:</b> <u>Provide notice of any temporary disruption that may affect persons with disabilities. Also prepare a document stating this disruption.</u>	<b>Compliance Deadline:</b> January 1, 2012
<b>Current Barriers:</b> None noted	
<b>Plan to Meet Requirements:</b> This requirement has been communicated to staff through policies and through training. HR will ensure this is done if there is a disruption.	
<b>Potential Future Barriers:</b> None noted	
<b>Responsible Authority:</b> HR	<b>Results:</b> Will be completed if required
<b>Accessibility Requirement:</b> <u>Provide accessible customer service training to all staff</u>	<b>Compliance Deadline:</b> January 1, 2012
<b>Current Barriers:</b> None noted	
<b>Plan to Meet Requirements:</b>	
All policies and training are in place, and all employees have been trained. Training continues to be a part of the onboarding process for all new employees.	
<b>Potential Future Barriers:</b> None noted	
<b>Responsible Authority:</b> HR	<b>Results:</b> Completed
<b>Accessibility Requirement:</b> <u>Provide training on changes to policies to staff on an ongoing basis and keep records of training.</u>	<b>Compliance Deadline:</b> January 1, 2012
<b>Current Barriers:</b> None noted	

**Plan to Meet Requirements:** Any changes to our policies will be communicated to staff and record of this kept by HR.

**Potential Future Barriers:** None noted

<b>Responsible Authority:</b> HR	<b>Results:</b> Completed
----------------------------------	---------------------------

<b>Accessibility Requirement:</b> <u>Prepare a document on the training policy, provide a copy of the document on request, notify that the document is available on request.</u>	<b>Compliance Deadline:</b> January 1, 2012
---	--

**Current Barriers:** None noted

**Plan to Meet Requirements:** There is a requirement for all employees to participate in all required AODA training and records are kept of this training.

**Potential Future Barriers:** None noted

<b>Responsible Authority:</b> HR	<b>Results:</b> Completed and Ongoing
----------------------------------	---------------------------------------

<b>Accessibility Requirement:</b> <u>Establish a feedback process for providing goods, services, or facilities to person with disabilities and Prepare a document stating this process. Notify that the document is available upon request</u>	<b>Compliance Deadline:</b> January 1, 2012
---	--

**Current Barriers:** None noted

**Plan to Meet Requirements:**  
We have feedback forms available at the front door of our 3 locations and on our website. We can provide an accessible version of this form if needed and requested.

**Potential Future Barriers:** None noted

<b>Responsible Authority:</b> All employees who receive a request, HR will oversee	<b>Results:</b> Prepared Completed and Ongoing
--	--

<b>Accessibility Requirement:</b> <u>Ensure that documents or information given to a person with a disability are offered in an accessible format with communication support</u>	<b>Compliance Deadline:</b> January 1, 2012
---	--

**Current Barriers:** None noted

**Plan to Meet Requirements:**

This expectation has been stated in our policies and through training to staff

**Potential Future Barriers:** None noted

**Responsible Authority:** All employees who receive a request and Human Resources

**Results:** Completed

**Review and Update**

This document was created on July 7, 2018

This document was reviewed and revised November 28, 2019

This document was reviewed and revised August 29, 2022

This document must be reviewed and updated before August 29, 2027