

Accessibility for Ontarians with Disabilities Act

Multi – Year Accessibility Plan

Implementation Date: January 19, 2024

This publication is available in accessible formats upon request.

Please reach out to Human Resources should you require alternate formats.

Email: hr@crawfordss.ca

Phone: 905-356-4200

Mail: 4741 Queen Street, Niagara Falls ON L2E 2M2

Statement of Commitment:

Crawford Smith & Swallow Chartered Professional Accountants LLP and Crawford Smith & Swallow Wealth Management Inc., hereinafter referred to as CSS, is committed to treating all people in a way that allows them to maintain their dignity and independence. CSS is committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its regulations.

CSS values diversity and inclusion in its team members and embraces diversity as a core value. We recognize the diverse needs of our clients, and we strive to provide services in a way that respects the dignity, independence, integration, and equal opportunity. We consider a diverse range of people for employment and offer advancement opportunities to all team members. We are committed to providing reasonable accommodation for individuals with disabilities.

CSS will achieve a barrier-free and accommodating work environment through this accessibility plan that outlines actions to prevent and remove barriers to accessibility and to meet the requirements. We have created policies and procedures that clearly benefit team members with disabilities and show our commitment to provide accessibility for our clients and employees overall.

CSS Accessibility Plan is posted on their website and will be provided in an accessible format upon request. CSS will review and update the accessibility plan at least once every five (5) years. The most recent revision occurred in January 2024.

These standards relates to customer service and is known as the *Accessibility Standard for Customer Service*. This standard ensures that individuals with disabilities will receive fully accessible, high-quality customer service. Businesses are expected to provide goods and services under the principles of dignity, independence, integration, and equal opportunity. All organizations that have more than one employee are required to comply with this standard. Businesses are expected to provide goods and services under the principles of dignity, independence, integration and equal opportunity. All organizations that have more than one employee are required to comply with this standard. CSS is committed to providing accessible services to our clients.

Feedback Process Regarding Provision of Services to Persons with Disabilities

Objective

Establish a process for receiving and responding to feedback and concerns about the manner in which we provide services to persons with disabilities. The feedback process must permit persons to provide their feedback in person, by telephone, in writing, or electronically.

Action

CSS has created a process for receiving and responding to our accessible processes. CSS welcomes feedback regarding its accessibility processes. Feedback can be provided via:

- By mail to 4741 Queen Street, Niagara Falls, ON L2E 2M2
- By telephone 905-356-4200
- In person at any Crawford Smith & Swallow Chartered Professional Accountants LLP office
- Email: hr@crawfordss.ca

Where possible, CSS will respond to feedback with a confirmation of receipt and a response or commitment to further investigation within five (5) business days from receipt of the inquiry. Additionally the website indicates that upon request, these documents will be provided in a format that takes individual needs into consideration.

Status: Complete

Establishment of Accessibility Policies & Procedures

Objective

To develop, implement, and maintain policies, practices and procedures that will govern the provision of CSS services to persons with disabilities. Policies, practices and procedures will demonstrate that CSS services will be provided in a manner that respects the dignity and independence of persons with disabilities. These policies will be made publicly available upon request.

Action

Developed the Accessibility for Ontarians with Disabilities Act Policy. The policy outlines the provision of goods and services to persons with disabilities; the use of assistive devices; the use of guide dogs,

service animals and service dogs; the use of support persons; notice of service disruptions; customer feedback; training; and the notice of availability and format of documents. The policy is found on the CSS website in our Accessibility Standards Section and can be found in the CSS Policy Manual which is reviewed by all team members upon hire.

Status – Completed

In the event that CSS might require a support person to accompany a person with a disability, we consult with the person with a disability to understand their needs and consider available evidence to determine that:

- 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
- There is no other reasonable way to protect the health or safety of the person or others on the premises

Accessibility Customer Service Training

Objective

Ensure all team members in Ontario receive training regarding the purposes of the AODA, the requirements of this Regulation, and the provision of CSS services to persons with disabilities. They are to receive training as soon as practicable on how to interact and communicate with persons with disabilities (including those who require the use of an assistive device or assistance of a service animal or support person and how to use assistive equipment or devices).

Action

Online training has been organized and completed by all current team members. New team members are required to complete the online training upon hire. CSS maintains records of the training.

Status: Complete and ongoing

INTEGRATED ACCESSIBILITY STANDARDS

The *Integrated Accessibility Standards Regulation (IASR)* sets out standards regarding information and communications, employment, and transportation. The requirements in this standard are not a replacement or a substitution for the requirements established under the Human Rights Code.

GENERAL

Establishment of Accessibility Policies

Objective

Develop, implement, and maintain policies that manage how CSS will achieve accessibility through meeting the applicable requirements under the IASR. These policies will include a statement of organizational commitment.

Action

CSS has developed an Accessibility Policy that addresses the requirements under the AODA and the IASR and includes a statement of organizational commitment to accessibility. The policy outlines the provision of goods and services to persons with disabilities; the use of assistive devices; the use of guide dogs, service animals, and service dogs; the use of support persons; notice of service disruptions; customer feedback; training; and the notice of availability and format of documents. It also addresses the requirements under the IASR regarding information, communication, and employment standards.

The policy is found on the CSS website under the AODA policy, as is also available internally to all team members.

Status: Complete

Integrated Standards Training

Objective

Ensure training is provided on the accessibility standards in the Regulation and the Ontario Human Rights Code to every employee, volunteer, and other persons who participate in the development of Crawford Smith & Swallow LLP policies or provide goods, services, or facilities on behalf of CSS

Action

Training to all team members is completed upon hire and on a annual continual basis

Status: Complete and ongoing

INFORMATION AND COMMUNICATION STANDARDS

Accessible Feedback

Objective

Ensure that the current process for receiving and responding to feedback is accessible to persons with disabilities by providing for accessible formats or communication supports on request.

Action

CSS has created the Accessibility Policy for Customer Service to provide guidance on receiving and responding to feedback. This can be accessed on our website and will be provided in an accessible format upon request. All feedback we receive is monitored and handled in accordance with our documented procedures.

Status: Complete

Accessible Formats and Communication Supports

Objective

Provide alternate formats or communication supports for persons with disabilities, on request. Consult with the person making the request to determine the suitability of an accessible format or communication support and provide these alternative formats or communication supports in a timely manner.

Action

Upon request, CSS will arrange for the provision of accessible formats and communication supports, in a timely manner.

Status: Complete

Accessible Websites and Web Content

Objective

Make all new internet websites conform to certain sections of the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0.

Action

CSS internet site has undergone a significant refresh. As part of this process, updates to the website have been made to ensure compliance with WCAG 2.0 Level AA, except where impracticable.

Status: Complete

EMPLOYMENT STANDARDS

Recruitment, Assessment, and Selection Process

Objective

Notify employees and the public about the availability of accommodations for applicants with disabilities in the recruitment process. Notify selected job applicants during the recruitment process that accommodations are available upon request in relation to materials or processes to be used. In the circumstance that a selected applicant requests an accommodation, consult with the applicant and provide or arrange for suitable accommodation that take into account the applicants unique accessibility needs.

Action

All standard communications with applicants, used throughout the recruitment process have been updated to ensure the public is aware of the availability of accommodations for applicants with disabilities. CSS's website has been updated with a Diversity and Inclusion statement, and an accommodation statement has been added to the start of our online application process and in all of our pre-formatted and standard email communications.

Our recruitment processes, including interview guidelines and scripts, have been updated with details on informing candidates of available accommodation during the recruitment process to ensure non-bias and to recognize accessibility standards at CSS.

Status: Complete

Notice to Successful Applicants

Objective

When making employment offers, notify the successful applicant of our policies for accommodating employees with disabilities.

Action

All standard CSS offer letters for permanent, fixed-term contract, part-time and subcontractors have been updated to include an accommodation statement. Additionally, the standard email in which our offer letters are distributed also includes information for candidates on how to request accommodation prior to and upon hire.

Status: Complete

Informing Employees of Supports

Objective

Inform team members of policies to support employees with disabilities, including policies on the provision of job accommodation. Provide new employees with the information as soon as practicable upon commencement of employment and provide updated information whenever there is a change in policy.

Action

As part of CSS onboarding process, all new hires are required to review our entire policy manual. All team members are required to review our policies on an annual basis. Additionally, new team members will have the opportunity to complete the accommodation plan form so they may request necessary accommodations.

Status: Complete

Accessible Formats and Communication Supports for Employees

Objective

Upon request, consult with team members requiring accessible formats and communication supports for information that is needed in order for them to perform his or her job, and information that is generally available to employees in the workplace. Team member consultation should determine the suitability of an accessible format or communication support.

Action

Accessible formats and communication support processes have been developed for both those returning from leave as well as for existing employees. Employees can request an accommodation via Human Resources who will work with them to understand what supports are required, and ensure those supports are supplied in the appropriate format.

Status: Complete.

Workplace Emergency Response Information**Objective**

Provide individualized workplace emergency response information to each team member that requires assistance in the event of an emergency. The emergency response information must be provided as soon as practicable one CSS becomes aware of the need for an accommodation for the team members. Review individualized workplace emergency response information as required.

Action

Health and Safety guides in each office include a statement regarding the availability of accommodation and individualized workplace emergency response procedures. The guides will advise team members how to receive the Health and Safety guide in an alternate format, as well as how to request an individualized safety plan. Human Resources will work directly with team members to create an individualized plan with any team member who requests it.

Status: Complete.

Documented Individual Accommodation Plans**Objective**

Establish written processes for the development of a documented individual accommodation plan for employees with disabilities that meets the requirements described in the Integrated Standards.

Action

A process for the development of a documented individual accommodation plan for those returning from a medically supported leave of absence, and for those who need accommodation outside of a leave absence has been created and has been posted internally. Individual accommodation plans will include the team member's workplace emergency response information and the accessible formats and communication supports that the team member requires. The plan will also include any other accommodations that the employee needs to do their job.

Status: Complete

Return to Work Process

Objective

Document a return-to-work process for employees who have been absent from work due to disability and require disability-related accommodations in order to return to work. The process must outline the steps CSS will take to facilitate the return to work of the team member, and use documented individual accommodation plans.

Action

A return-to-work process has been created and is utilized as a best with Human Resources when assisting a team member with their return to work. As part of the process, individual accommodation plans will be created, and include the team member's workplace emergency response information and the accessible formats and communication supports that the team member requires. The plan will also include any other accommodations that the employee needs to do their job.

Status: Complete

Performance Management

Objective

The accessibility needs of team members with disabilities or individual job accommodation plans, will be taken into consideration during performance management processes.

Action

CSS management will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans during mid-year and year end performance management reviews with team members. CSS Performance Management process has been updated to include a statement on accommodation. CSS's Equal Opportunity Policy also addresses this objective.

Status: Complete

Career Development and Advancement

Objective

The accessibility needs of team members as well as any individual accommodation plans must be taken into consideration when providing career development and advancement opportunities to employees.

Action

CSS management will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans when considering career development and advancement for team members.

Status: Complete

Redeployment

Objective

The accessibility needs of team members with disabilities as well as any individual accommodation plans must be taken into consideration when coordinating redeployment.

Action

CSS management will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans when considering the redeployment of team members.

Status: Complete

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