
CRAYOLA CANADA INTEGRATED ACCESSIBILITY POLICY

Last revised October 31, 2019

POLICY STATEMENT:

AT **CRAYOLA CANADA** ("the Company"), we strive to provide goods and services in a way that respects the dignity and independence of persons with disabilities. We are committed to ensuring that employees, customers and all stakeholders with disabilities are all treated equally.

PURPOSE:

This Policy is intended to provide the overarching framework to guide the review and development of other **CRAYOLA CANADA** policies, standards, procedures and guidelines to meet the requirements of *Accessibility for Ontarians with Disabilities Act, 2005* and the *Ontario Human Rights Code*.

Application

This Policy applies to all **CRAYOLA CANADA** employees, volunteers, and to any individual or organization that provides goods, services, facilities to the public or other third parties on behalf of the Company in accordance with the legislation.

Principles

All services, programs, goods and facilities are to be available to people with disabilities in a manner that:

- is free from discrimination
- accessible formats and communication supports
- seeks to provide integrated services
- provides an opportunity equitable to others to obtain, use and benefit from the goods or services, and:
- takes into consideration a person's disability

POLICY REQUIREMENTS:

General Standards

CRAYOLA CANADA is a private sector organization under the AODA and is committed to meeting the accessibility needs of people with disabilities.

Establishment of Accessibility Plans and Policies

CRAYOLA CANADA will produce a Multi-Year Accessibility Plan. The plan will be available on the company internet and intranet sites, and will be made available in an accessible format and with communication supports, upon request. Progress on the plan will be provided annually. The Company maintains policies governing how it will meet the requirements under the AODA, and will provide policies in accessible format, upon request.

Accessible Formats and Communication Supports

CRAYOLA CANADA will upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports will be provided in a timely manner, taking into account the person's accessibility needs.

Procurement of Goods, Services, Facilities and Kiosks

When procuring goods, services, self-service kiosks or facilities, **CRAYOLA CANADA** will incorporate accessibility criteria and features, unless it is not feasible, at which point an explanation will be provided, upon request

Training

All employees, volunteers and third parties providing goods and services to members of the public on **CRAYOLA CANADA's** behalf, as well as those who develop the policies, practices and procedures governing the provision of goods and services to members of the public or other third parties will receive accessibility training.

The training will include:

- A review of the purposes of the AODA and the requirements of the Accessibility Standards of Customer Service (Ontario Regulation 429/07) and instruction about the following:
 - How to interact and communicate with persons of various types of disability
 - How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance 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 or services to a person with a disability
 - What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services
- A review of the requirements of the accessibility standards referred to in the *AODA Integrated Accessibility Standards* (Ontario Regulation 191/11) ("IASR") and on the Human Rights Code as it pertains to persons with disabilities.
- The training provided will be appropriate to the duties of the employee, volunteer or third party. Training will take place as part of the on-boarding orientation processes or within 45 days of hire to an applicable role and on an ongoing basis in connection with changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities. Upon completion, **CRAYOLA CANADA** will keep a record of the training provided including the dates on which accessibility training took place.

Feedback

CRAYOLA CANADA welcomes feedback on how our products and services were delivered to people with disabilities. Feedback can be submitted to infocanada@crayola.com (call 1-800-342-6534 X 2252). Feedback will be forwarded to the appropriate personnel, responded to, documented and tracked. Feedback will be accepted in accessible formats and with other communication supports as required. The Company will also ensure that all other customer feedback processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.

Documentation

Documentation that describes this Policy and each of its requirements shall be maintained on the Company website and provided to individuals, upon request, and in the appropriate format or communication support.

CUSTOMER SERVICE STANDARDS:

CRAYOLA CANADA supports the full inclusion of persons with disabilities as set out in the *Canadian Charter of Rights and Freedoms, Ontario Human Rights Code, the Ontarians with Disabilities Act (ODA), 2001* and the *Accessibility for Ontarians with Disabilities Act (AODA) 2005*.

CRAYOLA CANADA will use reasonable efforts to ensure that its policies, programs and procedures are consistent with the following principles:

- 1) Dignity
- 2) Independence
- 3) Integration (except when alternate measures are necessary to meet the needs of persons with disabilities); and
- 4) Equal opportunity to obtain, use and benefit from its goods and services.

1) Dignity

The principle of respecting the dignity of a person with a disability means treating them as customers and clients who are as valued and as deserving of high quality and timely service as any other customers. Persons with disabilities are not treated as an afterthought or forced to accept lesser service, quality or convenience.

2) Independence

In some instances, independence means freedom from control or influence of others- freedom to make one's choices. In other situations, it may mean the freedom to do things in one's own way. People who may move or speak more slowly or differently must not be denied an opportunity to receive customer service because of this. Staff must allow persons with disabilities to take the time they need, without rushing them or taking over a task for them if someone prefers to do it themselves in their own way.

3) Integration

The provision of goods or services to persons with disabilities and others must be integrated to allow persons with disabilities to fully benefit from the same services in the same or similar way as other customers.

4) Equal Opportunity

In the case of services, equal opportunity means that persons with disabilities have the same opportunity as others to obtain, use and benefit from the way goods or services are provided.

The Provision of Goods and Services to Persons with Disabilities

When communicating with a person with a disability, **CRAYOLA CANADA** will do so in a manner that takes into account the customer's disability. In addition, **CRAYOLA CANADA** will make every reasonable effort to:

- Ensure that all customers receive the same value and quality of customer service experience;
 - Allow customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
 - Use alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
 - Take into account individual needs when providing goods and services; and
 - Communicate in a manner that takes into account the customer's disability.
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Assistive Devices

Persons with disabilities may use their own assistive devices when accessing goods or services by **CRAYOLA CANADA**.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, if an aisle isn't wide enough for a customer to maneuver their wheelchair, a sales associate would assist by asking if help is required and by bringing the goods to the customer so they are accessible for viewing.

Service Animals

A customer with a disability that is accompanied by a guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No Pet" policies do not apply to guide dogs, service animals and/or service dogs.

Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law, **CRAYOLA CANADA** will offer alternative methods to enable the person with a disability to access goods and services (for example, securing the animal in a safe location and offering the guidance of an employee).

If there is a conflict that arises concerning a service animal on site (e.g., with another staff member who is allergic or fearful about an animal), managers will work with the parties to find an acceptable solution. The best solution will be one that respects each individual's right to a safe, secure and accessible environment.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability **CRAYOLA CANADA** may request verification from the customer. Verification may include:

- A letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;

Support Persons

Any person with a disability who is accompanied by a support person will be allowed to enter **CRAYOLA CANADA's** premises open to the public or other third parties with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation taking place in the presence of the support person.

When support persons are required (e.g., sign language interpreters, real-time captioners, attendants) for the Company's sponsored meetings, consultations or events, **CRAYOLA CANADA** will arrange to pay support persons directly for their time.

Admission Fees

If **CRAYOLA CANADA** charges an admission fee in connection with a support person's presence at an event or function, notice will be given in advance about the amount, if any, that is payable in respect of the support person accompanying a person with a disability.

Notice of Service Disruptions

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of **CRAYOLA CANADA**. In the event of a planned temporary disruption to facilities or services that customers with disabilities rely on to access or use **CRAYOLA CANADA's** goods or services, **CRAYOLA CANADA** will provide advance notice of the disruption. Where the temporary disruption is unplanned, advance notice may not be possible but notice will be provided when **CRAYOLA CANADA** becomes aware of the disruption.

In the event that a notification needs to be posted, the following information will be included:

- Goods or services that are disrupted or unavailable
- Reason for the disruption
- Anticipated duration
- A description of alternative services or options, if available

When disruptions occur, **CRAYOLA CANADA** will provide notice by:

- Posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the **CRAYOLA CANADA** website;
- Contacting customers with appointments;
- Verbally notifying customers when they are making an appointment; or
- By any other method that may be reasonable under the circumstances.

INFORMATION AND COMMUNICATION SUPPORT STANDARDS:

Communication

When communicating with a person with a disability, employees, volunteers and third party contractors will do so in a manner that takes into account a person's disability.

Accessible Websites and Web Content

Internet websites and web content controlled directly by **CRAYOLA CANADA** or through a contractual relationship that allows for modification of the product will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA in accordance with the schedule set out in the AODA Integrated Accessibility Standards. The **CRAYOLA CANADA** website is WWW.crayola.ca.

Emergency Procedures, Plans and Information

CRAYOLA CANADA will provide all existing public emergency procedures, plans and public safety information, upon request in an accessible format or with appropriate communication supports in a timely manner.

EMPLOYMENT STANDARDS:

Recruitment

Information will be posted about the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing will be notified that accommodations for material to be used in the process are available, upon request. The Company will consult with any applicant who requests an accommodation in a manner that takes into account the applicant's disability. Successful applicants will be notified about the policies for accommodating employees with disabilities as part of their offer of employment.

Accessible Formats and Communication Supports for Employee

Upon an employee's request, the Company will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform the employee's job; and

- Information that is generally available to employees in the workplace.

CRAYOLA CANADA will consult with the employee making the request in determining the suitability of an accessible format or communication support.

Workplace Emergency Response Information

If an employee's disability is such that workplace emergency response information is necessary and the Company is aware of the need for accommodation, this information will be provided to employees. In addition, this information will be provided, with the employee's consent, to the person designated to provide assistance. The information will undergo review when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when the Company reviews its general emergency response plan.

Documented Individual Accommodation Plans

A written process for the development and maintenance of documented individual accommodation plans will be developed for employees with disabilities. If requested, these plans will include information regarding accessible formats and communication supports. If requested, the plans will include individualized workplace emergency response information.

Return to Work Process

The Company will have in place a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work process will outline the steps that the Company will take to facilitate the return to work.

Performance Management, Career Development and Redeployment

The Company will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, performance management and when considering redeployment.

BUILT ENVIRONMENT STANDARDS:

CRAYOLA CANADA will comply with the AODA Design of Public Spaces Standards (Accessibility Standards for The Built Environment) when undertaking new construction and redevelopment of public spaces in the following areas:

- Outdoor public eating areas
- Exterior paths of travel
- Accessible parking
- Obtaining services
- Maintenance of accessible elements

The Company will ensure that the Accessibility Design Standards reflect the AODA Built Environment Standards.

RESPONSIBILITIES:

CRAYOLA CANADA will review this Policy annually to ensure ongoing compliance with regulated accessibility standards and legislated obligations.

MONITORING / CONTRAVENTIONS:

The failure to comply with AODA regulations can result in administrative penalties. Supervisors and managers shall monitor current practices to ensure compliance. Failure to comply with this policy may result in disciplinary action, up to and including dismissal.

REFERENCES:

[AODA- Ministry of Community and Social Services](#)

AVAILABILITY OF DOCUMENTS:

Any questions about this AODA policy or availability of documents can be directed

to: **CRAYOLA CANADA**

Phone: 800-342-6534 X 2252

Mail: PO Box 120, 15 Mary St. W
Lindsay, ON K9V 4R8

Email: infocanada@crayola.com