# **Accessibility Plan**

2023-2025



























Information contained in this publication or product may be reproduced, in part or in whole, and by any means, for personal or public non-commercial purposes without charge or further permission, unless otherwise specified. Commercial reproduction and distribution are prohibited except with written permission from the Financial Consumer Agency of Canada.

For more information, contact:

Financial Consumer Agency of Canada 427 Laurier Ave. West Ottawa ON K1R 1B9

https://www.canada.ca/en/financial-consumer-agency.html

ISSN 2817-1292

© His Majesty the King in Right of Canada, as represented by the Minister of Finance Canada, December 2022.

Aussi disponible en français sous le titre : Plan d'accessibilité 2023-2025







# Table of contents

Message from the Commissioner	1
Message from the Equity, Diversity and Inclusion Champion	2
General	3
About the Financial Consumer Agency of Canada	3
FCAC's obligations under the Accessible Canada Act	3
FCAC's context	3
FCAC's responsible authority on accessibility	5
Contact information	6
Consultations	7
FCAC's accessibility action plan	8
Priority area: Employment	8
Priority area: The built environment	9
Priority areas: Information and communications technology and other communications	10
Priority area: Procurement	12
Priority area: Programs and services	12
Measures to prevent accessibility barriers	14







# Message from the Commissioner



I am pleased to present the Financial Consumer Agency of Canada's (FCAC) 3-year accessibility plan. This plan details the current state of accessibility at the Agency relative to the 7 priority areas in the Accessible Canada Act and outlines the actions we will take over the next 3 years to remove identified barriers, prevent new ones from forming, and promote equity, diversity and inclusion in our workforce and core business activities. Accessibility is an essential component of disability inclusion.

FCAC takes an intersectional approach to fulfilling its mandate, seeking to understand and consider the demographic and socioeconomic characteristics, needs and challenges of Canada's diverse population, including persons with disabilities. This

approach is evidenced in FCAC's National Financial Literacy Strategy 2021–2026. We will continue to seek out opportunities to amplify our impact in all areas of our work by ensuring we apply an equity, diversity and inclusion lens in our supervisory, research and education programs.

At the Agency, our diverse and talented employees are the foundation of our success. An inclusive organizational culture of innovation, collaboration and excellence underlies all our work. We remain focused on our people's well-being and on enhancing our tools, business processes and organizational functions in a barrier-free environment.

We recognize that a long-term commitment is required to make progress. We will monitor and measure our progress in advancing accessibility and will share these results annually. It will take concerted effort, but it is another opportunity for us to make a collective impact. I invite you to read this accessibility plan, and I welcome your feedback.

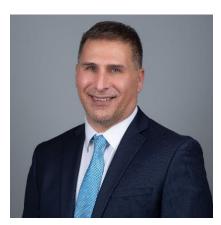
Judith Robertson Commissioner







# Message from the Equity, Diversity and **Inclusion Champion**



Every day, people with disabilities face barriers. Sometimes these are physical and pose challenges in accessing buildings, using facilities, and connecting and communicating with service providers, colleagues, friends and family. Other barriers are attitudinal in nature and can be invisible, unintentional or systemic. Most often, these are perpetuated by stigma or misunderstanding.

We all have a role to play in removing societal barriers and helping to build an accessible and inclusive workforce at FCAC. This is important because, according to the 2017 Canadian Survey on Disability, more than 6 million Canadians — 22% of the population aged 15 and over — have a disability.

I invite you to do your part to create awareness and help eliminate the barriers that prevent Canadians with a disability from participating fully in work and society.

Frank Lofranco Deputy Commissioner, Supervision and Enforcement







# General

### About the Financial Consumer Agency of Canada

The mandate of the Financial Consumer Agency of Canada (FCAC, the Agency) is to protect financial consumers by supervising federally regulated financial entities and strengthening the financial literacy of Canadians. As a regulator, FCAC monitors and supervises the compliance of financial institutions, external complaint bodies and payment card network operators with consumer protection measures set out in legislation, public commitments and codes of conduct. Through research and education, the Agency enhances the financial literacy of Canadians and raises awareness of their rights and responsibilities in their dealings with financial institutions.

FCAC derives its mandate from the Financial Consumer Agency of Canada Act, which outlines the Agency's functions, administration, and enforcement powers, and lists the sections of federal laws and regulations under its supervision.

FCAC is an independent agency that reports to Parliament through the Minister of Finance.

# FCAC's obligations under the Accessible Canada Act

The Accessible Canada Act was enacted on July 11, 2019, and associated regulations came into force in December 2021. The act's goal is to achieve a Canada without barriers by 2040. It requires federal regulated entities, including FCAC, to proactively identify, remove and prevent accessibility barriers and publish a 3-year accessibility plan by December 31, 2022. There are 7 priority areas under the act:

- employment
- built environment
- information and communication technologies
- communications (other than information and communications technologies)
- procurement of goods, services and facilities
- design and delivery of programs and services
- transportation<sup>1</sup>

The act also requires organizations to publish annual progress reports on the implementation of their plan and establish a process to obtain feedback on both the plan and accessibility barriers from employees, stakeholders, and members of the public.

### FCAC's context

External perspective: A leader in reducing barriers to improve consumer financial outcomes

FCAC takes an intersectional approach to fulfilling its mandate, seeking to understand and consider the demographic and socio-economic characteristics, behaviours, motivations, challenges and communication preferences of Canada's diverse population, with particular attention to vulnerable groups. FCAC develops and adapts its interventions to address the diverse needs of different populations, promoting access to financial products and services, and the reduction of any identified systemic barriers and/or discrimination in the financial sector.

<sup>&</sup>lt;sup>1</sup> This priority area under the act does not apply to FCAC and is not addressed in this accessibility plan.







FCAC's research indicates that financial vulnerability affects a wide variety of people, regardless of culture, community or background. While vulnerability is not limited to certain groups or demographics, systemic barriers have led to certain groups being more likely to face financial vulnerability. Other research has shown that the low-income population includes disproportionate women, single adults and people with disabilities. For this reason, FCAC identifies these segments of the population as priority groups.

Internal perspective: An agency with a diverse, inclusive and respectful workforce

FCAC's 2021–2026 Strategic Plan describes how the Agency will fulfill its vision to be a leader and innovator in financial consumer protection by focusing on 4 strategic goals. One of the goals is to enable the future of work by strengthening people management practices and fostering a culture of innovation, collaboration and excellence.

In addition, the core principles in the Strategic Plan are intended to foster an organizational culture that prioritizes the well-being of its team members and the achievement of its consumer protection mandate. The principles of the Agency's "one mandate, one team" approach, coupled with a strong commitment to equity, diversity, inclusion and bilingualism, are the foundational pieces that will allow the Agency to build a truly diverse workforce and foster a strong sense of belonging for employees.

FCAC has a non-unionized workforce and is subject to the Public Service Employment Act. During 2021–2022, FCAC's staff grew by 16%. As of March 31, 2022, there were 189 employees. FCAC's approach to employment equity includes:

- targeted recruitment to enhance representation
- new accommodation and accessibility measures
- intentional efforts to celebrate diversity and promote an inclusive and respectful workforce

In 2021–2022, FCAC hired 42 new employees, 7 of whom identified as having a disability. As a result, FCAC's representation of persons with disabilities increased to 11.6% from 9.8% and exceeded the workforce availability of 9.1%.

FCAC collects anonymous employee feedback by participating in the Public Service Employee Survey. This survey provides information to support the continuous improvement of people management practices, and the results allow federal organizations to identify their strengths and areas of concern. The survey was last conducted in 2020 and contained several questions related to diversity and inclusion. Eighty-six per cent of FCAC respondents indicated that the Agency respects individual differences (e.g., culture, work styles, ideas, abilities), and 90% indicated that FCAC implements activities and practices that support a diverse workplace. These results were significantly higher than the public service average.

There were also several survey questions related to the duty to accommodate. Fourteen per cent of respondents indicated having requested a workplace accommodation, out of whom about a third had done so because of a disability. Overall, 88% of respondents who requested an accommodation were satisfied with the measures implemented. Moreover, 83% of survey respondents indicated that they would feel comfortable requesting an accommodation from their immediate supervisor. These results were on par with the public service average.<sup>3</sup>

<sup>&</sup>lt;sup>2</sup> To determine if persons with disabilities are equitably represented at the Agency, their representation was compared to the 2017 Canadian Survey on Disabilities.

<sup>&</sup>lt;sup>3</sup> FCAC's Public Service Employee Survey results can be found here: <u>2020 Public Service Employee Survey Results by Theme for Financial Consumer Agency of Canada</u>.







# FCAC's responsible authority on accessibility

The Assistant Commissioner, Corporate Services is FCAC's responsible authority on accessibility.







### Contact information

FCAC welcomes your feedback, questions and suggestions on accessibility at the Agency. You can contact us using any of the ways shown below:

Online: Financial Consumer Agency of Canada

Telephone (Consumer Services Centre):

• toll free: 1-866-461-3222

• in Ottawa or outside Canada: 613-960-4666

\*Information officers are available Monday to Friday from 8:30 a.m. to 5:00 p.m. Eastern Time.

Teletypewriter TTY (for persons with hearing impairment):

toll free: 1-866-914-6097

• in Ottawa or outside Canada: 613-947-7771

Video relay service: FCAC welcomes video relay service calls. You do not need to authorize the operator to communicate with FCAC. Visit Canada VRS to learn more.

Email: Contact us

Twitter: @FCACan

YouTube: FCACan

Facebook: FB.com/FCACan

Instagram: <a href="fcac\_can">fcac\_can</a>

Postal address:

Financial Consumer Agency of Canada

**Enterprise Building** 

427 Laurier Ave. West Ottawa, ON K1R 1B9

To request a copy of this plan in an alternative format, please contact us.







# Consultations

FCAC partnered with a third party specialized in accessibility to gather information about the Agency's current state of accessibility and identify potential barriers. Several activities were conducted to collect data:

- Document review: The assessment began with a review of relevant FCAC information, including employment equity reports, human resources policies and action plans, Public Service Employee Survey results, the Agency's terms and conditions of employment, and the emergency procedures manual.
- FCAC subject matter expert consultations: FCAC employees whose work aligns with the Accessible Canada Act's priority areas answered a questionnaire tailored to their role at the Agency.
- FCAC employee consultations: All personnel were invited to complete a survey posted on the Agency's internal website to provide insight about any barriers to accessibility they have experienced or may be aware of at FCAC. Almost one third of respondents self-identified as a person with a disability.
- Third party accessibility advisory group consultations: The third party consulted with its
  accessibility advisory group, which comprised 9 Canadians with disabilities.<sup>4</sup> Members of the
  advisory group visited FCAC's website and social media channels, reviewed the process for filing
  a complaint, and contacted the Agency's Consumer Services Centre. Members then convened a
  meeting to discuss their findings. FCAC subject matter experts were invited to observe the
  discussion.

The information gathered was analyzed to determine the Agency's current state of accessibility and identify potential barriers. The third party also proposed actions to remove the barriers. Those actions are contained in this plan, along with other relevant measures the Agency is taking to advance equity, diversity and inclusion in its workforce and core business activities to proactively prevent new accessibility barriers from forming.

<sup>&</sup>lt;sup>4</sup> The 2017 Canadian Survey on Disability identified 10 types of disabilities: vision, hearing, mobility, flexibility, dexterity, pain-related, learning and developmental, mental health-related and memory.







# FCAC's accessibility action plan

This section describes the goal and current state of accessibility at FCAC broken down by the Accessible Canada Act's priority areas. It also details the barriers that were identified by the third party and through internal and external consultations and explains the actions that will be undertaken over the next 3 years to remove barriers and prevent new ones from forming.

### Priority area: Employment<sup>5</sup>

#### Goal

FCAC attracts, develops and retains employees by promoting a diverse and inclusive workplace and maintaining employment practices that are accessible and free of barriers.

#### Current state

Established in 2001, FCAC initially outsourced its human resources management to another government entity. The Agency appointed its first chief human resources officer in 2018 and introduced a new human resources service delivery model in 2019. Also in 2019, the Agency launched its first People Management Framework to guide human resources activities over the next 3 years and beyond.

In October 2021, FCAC launched its first Policy on Accommodation. The policy recognizes the duty to accommodate for employees as well as persons seeking employment. Beyond a duty, the Agency believes that an enabling environment allows everyone to maximize their contributions and potential and supports a high-performing workforce committed to achieving its ambitious vision to be a leader and innovator in financial consumer protection.

FCAC released its first Equity, Diversity and Inclusion Action Plan in March 2022 to support a strategic and coordinated approach to building both a culture and business ethos where valuing equity, diversity and inclusion is the norm. The triennial plan is a roadmap to foster a culture of diversity and inclusion, create a more inclusive and diverse workplace, and integrate equity, diversity and inclusion into the Agency's core programming.

In fall 2022, the Agency launched its first employment system review. Beyond meeting an Employment Equity Act obligation, its purpose is to conduct an in-depth assessment of all employment systems, policies and practices and includes collecting employee feedback about the way these are implemented. This comprehensive review identifies best practices that can be expanded across the workplace as well as existing or potential barriers that may prevent specific groups from contributing to their full potential.

Given that FCAC is subject to the Public Service Employment Act, its recruitment practices are nonpartisan and merit based. The goal is to ensure a workforce that is representative of the diversity, linguistic duality and range of backgrounds and skills of all Canadians. The Agency's human resources advisors regularly promote hiring from Public Service Commission inventories that include candidates who have self-identified as having a disability. In recent years, FCAC has hired students through the Accessible Career Transitions Program, a recognized Carleton University initiative that helps students who self-identify as having a disability secure meaningful employment.

<sup>&</sup>lt;sup>5</sup> FCAC takes a holistic approach to the act's priority area of employment by considering all elements of the people management function. These include compensation, organization and classification, labour relations, pensions and benefits, executive management, values and ethics, diversity and inclusion, occupational safety and health, wellness, performance and talent management, and employee recourse.







The Agency's job advertisements and onboarding materials encourage applicants and employees to selfidentify and to request any accommodation measures they need to participate fully.

FCAC recognizes that celebrating diversity and providing opportunities to learn are pivotal in raising awareness and fostering a healthy, inclusive and respectful environment. The Agency promotes equity, diversity and inclusion initiatives, related national and international events, and awareness campaigns, such as National AccessAbility Week in June and National Disability Employment Awareness Month in October. It also offers learning activities on equity, diversity and inclusion topics, such as unconscious bias, and promotes other learning resources, including the Canada School of Public Service's Accessibility Learning Series and resources from GCTools.<sup>6</sup>

#### Identified barriers

1. FCAC's "Job opportunities at FCAC" webpage does not tell users they will be redirected to the Government of Canada's jobs website.

Noting the strength of FCAC's current employment practices, the third-party review and consultations identified only 1 barrier. FCAC posts all job opportunities through the Public Service Commission's online application system, which is the Government of Canada's standard. Findings indicate that the "Job opportunities at FCAC" webpage is confusing because it does not explain that when a user clicks on the link to view current employment opportunities, they will be redirected to the Government of Canada's job portal. This can be particularly challenging for people who are using screen readers.

#### Actions to remove barriers

Action	Timeline
1. Include text on the "Job opportunities at FCAC" webpage that	March 2023
indicates that applicants will be redirected to the "GC Jobs"	
webpage, where members of the public can search for and apply	
to jobs at FCAC.	

### Priority area: The built environment

#### Goal

FCAC's physical spaces are barrier-free and enable employees and visitors to circulate freely and safely.

#### Current state

FCAC's main office is in Ottawa. Efforts are underway to establish a second office space in Toronto. As part of a workplace modernization project, construction began in 2022 on the Agency's Ottawa office. The new space was designed to maximize accessibility and meet the Canadian Standards Association's built environment standards. This new office space will include:

- accessible, universal washrooms
- accessible kitchen space with lowered counters and roll-under sinks
- power door openers
- adjustable workstations and height-adjustable desks
- wide hallways with enough space for a person using a wheelchair to move freely
- a colour-coding system to help people with low vision find their way around
- Braille lettering on signs throughout the building

<sup>&</sup>lt;sup>6</sup> GCTools is an internal suite of digital platforms for Government of Canada employees to drive innovation, communication, collaboration, professional networking and inter-departmental initiatives.







FCAC has an up-to-date emergency procedures manual and requires all new employees to read it. The manual includes information for persons who need assistance due to a disability. It requests that they self-report to the Agency's responsible authorities to ensure that appropriate procedures can be put in place to assist them during an emergency.

#### Identified barriers

The third party could not identify barriers in FCAC's built environment because the Agency's Ottawa office was under construction during the development of this plan. Employees will begin occupying the new workspace in 2023. Given that buildings that have been designed to be accessible can still pose challenges for some people with disabilities, the Agency will encourage its employees and visitors to submit feedback on accessibility barriers that they experience while at FCAC's physical locations.

# Priority areas: Information and communications technology and other communications

#### Goal

FCAC's information and communications technology products and services are accessible, and its information and resources are easy to understand in an increasingly digital world.

#### Current state

All information management and information technology tools implemented at the Agency meet Government of Canada accessibility standards. The Agency migrated these tools to a cloud-based system, Microsoft 365, in spring 2021. This transition increased the Agency's security safeguards and the reliability of its networks and supports flexible and hybrid work arrangements. The platform promotes digital inclusion by offering features such as accessibility checkers and accessible templates. It is compatible with assistive technologies, such as screen readers.

The Agency's Consumer Services Centre performs a vital role in supporting the Agency's consumer protection mandate by providing helpful information directly to financial consumers, merchants and stakeholders. The Consumer Services Centre can be reached by telephone, email or mail, or by submitting an online feedback form. The Agency also offers a teletypewriter (TTY) service. A teletypewriter is a device that allows users to send typed messages across phone lines. Many people who are deaf, deafened, hard of hearing, or who are deafblind may use teletypewriters to call other individuals. The Agency is committed to ensuring that its communication channels remain as accessible as possible.

The Agency also manages internal and public-facing websites and social media channels. FCAC's website content meets all accessibility guidelines, including Web Content Accessibility Guidelines 2.1. The Agency strives to ensure that all social media images include alternative text (ALT text) and that descriptive transcripts are available for the Agency's promotional videos. The Agency's intranet site, known as the Forum, follows digital accessibility guidelines.

The Agency uses the Government of Canada's Canada.ca Content Style Guide in addition to a language analysis platform to ensure its information is readable, clear and simple. A strategic review to streamline FCAC's consumer information is currently being conducted. As part of this initiative, content is being reviewed to ensure it is written in plain language and at a grade 8 level, which is the Government of Canada's established target level.<sup>7</sup>

Although FCAC strives to write its consumer-directed information in plain language, some sections of its website and other written materials directed at the financial industry or academia may not be.







In fiscal year 2021–2022, FCAC offered sign language interpretation for 2 national events at which the National Financial Literacy Strategy and Financial Literacy Month were launched. Live captioning of videos and pre-recorded speeches are available for virtual events and transcripts for internal videos are also regularly available.

#### Identified barriers

1. There is no live chat option for communicating with FCAC.

Although phone and email communication are currently the predominant methods of communication, live chat functions have become an important communication tool. The third-party review and consultations determined that a live chat would improve accessibility, particularly for people who have difficulty with hearing and cannot use a phone but would appreciate a quick response.

2. The "Code of Conduct when contacting FCAC" webpage does not include accessibility practices.

FCAC is committed to providing high-quality and timely consumer services. When contacting FCAC, Canadians can expect to be treated with respect and impartiality. The "Code of Conduct when contacting FCAC" webpage outlines expectations for both FCAC and the consumer when the Agency is contacted. While the Code reflects FCAC's core value of respect, the third-party review recommended that it also include the principles of equity, diversity and inclusion. Also, to meet the requirements of the Accessible Canada Act, the webpage could include a declaration that materials will be provided in alternative formats upon request as well as information about how to contact the Agency to provide feedback on accessibility barriers.

3. Some information on FCAC's website is complex and may be difficult for people with disabilities to read and understand.

The third-party review and consultations found that some information on FCAC's website was difficult to understand. Navigating Canada's financial landscape is a challenge for many people due to the growing complexity of financial products and services, the number of choices and providers, and the digitalization of finance. While these aspects may pose barriers for many Canadians, they can be particularly challenging for some people with disabilities, especially those with cognitive, learning, or intellectual disabilities. A strategic review to streamline FCAC's consumer information is currently being conducted. As part of this initiative, content is being reviewed to ensure it is written in plain language and at a grade 8 level, which is the Government of Canada's established target level. 8 It is important that FCAC provides information in plain language that is easy to read and understand and free of jargon.

4. Some social media posts use alternative text inconsistently.

People who have vision-related disabilities may rely on screen readers to describe digital content. When a screen reader encounters an image, it reads out the alternative text that has been provided for that image. The alternative text is meant to explain in words what the picture is as well as any information contained within it. This is meant to allow a person using a screen reader to get the same information as someone who is able to see the image. The third-party review determined that some of the Agency's social media posts did not include alternative text. FCAC's website content meets all accessibility guidelines, including Web Content Accessibility Guidelines 2.1. The Agency strives to ensure that all social media images include alternative text (ALT text) and that descriptive transcripts are available for the Agency's promotional videos.

<sup>8</sup> Although FCAC strives to write its consumer-directed information in plain language, some sections of its website and other written materials directed at the financial industry or academia may not be.







#### Actions to remove barriers

	Action	Timeline
1.	Update FCAC's "Code of Conduct when contacting FCAC"	March 2023
	webpage to mention people with disabilities and accessible	
	communication practices.	
2.	Explore adding a live chat option to FCAC's website.	End 2024
3.	Explore conducting user testing of FCAC's consumer-directed	End 2024
	information to identify accessibility barriers.	
4.	Review FCAC's consumer-directed information and apply plain	Ongoing
	language principles.	
5.	Ensure that all social media posts are accessible and consistent	Ongoing
	with the use of alternative or descriptive text.	

### Priority area: Procurement

#### Goal

FCAC's procurement practices include accessibility considerations.

#### Current state

FCAC's current process for buying products and services adheres to the Government of Canada's Directive on the Management of Procurement. This directive requires organizations to consider accessibility requirements in the purchase of goods and services. The Agency's technical authorities are required to include accessibility requirements in their purchase requests or complete a justification form explaining why they did not do so. The Agency purchases information technology equipment through Shared Services Canada or Public Services and Procurement Canada, both of which have accessibility standards. In addition, the Agency considers user preferences when procuring information technology equipment.

#### Identified barriers

The third-party review could not identify any specific barriers in FCAC's procurement process.

### Priority area: Programs and services

#### Goal

Reduce barriers in the financial ecosystem that limit or hinder people with disabilities from accessing, understanding, and using appropriate financial products, services, and education to their benefit.

#### Current state

Insights from research and behavioural science are key to providing evidence-based, trustworthy, and practical information for financial consumers. FCAC develops and adapts its information, tools and resources to address the diverse needs of different populations, promote equitable access to financial products and services, and reduce any identified systemic barriers or discrimination in the financial sector.

FCAC offers several tools on its website to help Canadians create and manage a budget, establish financial goals, and choose appropriate financial products. These tools comply with the Government of Canada Web Experience Toolkit standards and Web Content Accessibility Guidelines 2.0. Also, each tool has its own feedback mechanism.







FCAC regularly collaborates with 18 financial literacy networks across Canada, representing approximately 600 organizations, including the Canadian Financial Empowerment Network for those with Disabilities. This network's mission is to champion financial literacy initiatives for Canadians whose lives have been affected by disabilities or special needs and to empower them to improve their financial futures by providing easily accessible tools and resources that help improve financial literacy and independence. The network was formed in 2019 and currently has 4 representatives and 3 partner organizations who work with a broad range of stakeholder organizations in the disability and/or special needs space.

The Agency also regularly collaborates on consumer protection and financial literacy initiatives with other government departments, including Employment and Social Development Canada's Office for Disability Issues, the Government of Canada focal point for key federal partners working to promote the full inclusion and participation of Canadians with disabilities in all aspects of society and community life. FCAC has participated in Office for Disability Issues meetings in recent years.

In July 2021, FCAC released Make Change that Counts: National Financial Literacy Strategy 2021–2026. The Strategy provides a framework to build a more accessible, inclusive and effective financial ecosystem for all Canadians. It is a 5-year plan that focuses on reducing barriers, catalyzing actions, and creating new opportunities for Canadians to achieve positive financial outcomes and build financial resilience.

The National Strategy lays out a framework through which stakeholders can reduce barriers in the ecosystem that limit or hinder people from accessing, understanding, and using appropriate financial products, services, and information to their benefit. It identifies 3 ways in which stakeholders can reduce barriers for financial consumers:

- Communicate in ways people understand. How information is presented to people can have a significant impact on their decisions. Information that is difficult to understand can be a barrier to knowledge—and an obstacle to making appropriate decisions.
- Build and provide for diverse needs. The financial ecosystem should build financial products, services, and literacy efforts that acknowledge and embrace a sophisticated understanding of diversity and inclusion. This includes accommodating disabilities and cognitive challenges. While there has been an increase in stakeholder activities to reach and engage a wider diversity of Canadians, more can be done to reduce barriers and make financial literacy efforts, as well the financial system overall, more inclusive, and accessible.
- Support increased digital access and digital literacy. As the financial sector moves online, it is evident that a financial literacy strategy for today's increasingly digital financial marketplace needs to highlight the need for digital access and digital literacy. While this move to digital was already well underway prior to 2020, the COVID-19 pandemic has accelerated this trend, making the need for digital access and literacy even more pressing.

#### Identified barriers

1. The process for filing a complaint against a bank can be onerous and confusing. This could lead some people with disabilities not to do so.

Canadian financial consumers who experience problems with federally regulated financial institutions (that is banks and federally regulated trust, loan and insurance companies) have the right to make complaints. By law, federally regulated financial institutions are required to have procedures for handling complaints. FCAC also has set specific expectations for these financial institutions regarding their procedures for handling complaints.







Financial consumers can contact FCAC for information about a financial institution's complaint-handling process or if they experience delays when using it. FCAC does not resolve individual disputes and does not provide redress or compensation.

The third-party review and consultations found the complaint-handling process confusing and difficult to understand. The information on complaint handling is contained on different web pages, so it requires readers to click on several links. Also, the steps to file a complaint are unclear, and the amount of work that a person is required to do to submit a complaint is onerous and may discourage some people with disabilities from filing.

#### Actions to remove barriers

	Action	Timeline
1.	Review FCAC's educational material on the complaint process for accessibility and ease of understanding and develop a plan to address any barriers that are identified.	March 2023

# Measures to prevent accessibility barriers

FCAC is committed to advancing accessibility through continuous monitoring and oversight. FCAC's Equity, Diversity and Inclusion Action Plan provides a concrete roadmap to chart progress and measure results, while ensuring that the Agency continues to consult with designated group members and equity seeking groups, including persons with disabilities. The roadmap will enable the Agency to detect and proactively address emerging issues that may produce new accessibility barriers.

Prevention measures are focused on four broad areas:

- 1. Physical accessibility: Ensuring FCAC's new office space meets the Canada Standards Association's built environment standards and promptly addressing issues identified by employees and visitors on barriers that they experience while at FCAC's physical locations.
- 2. Organizational policies, practices and decision-making processes: Considering accessibility and equity, diversity and inclusion perspectives in developing the Agency's internal policies and work practices, and in decision-making.
- 3. Organizational culture: Fostering a culture that minimizes attitudinal barriers such as discrimination, stereotyping and stigma, by continuing to increase awareness, understanding, and knowledge of diversity and inclusion issues at all levels of the organization. This could be achieved by promoting events from the equity, diversity and inclusion commemorative calendar, organizing learning activities and continuing to strengthen the use of equity, diversity and inclusion strategies in recruitment and staffing processes.
- 4. Supervisory, research and education programs as part FCAC's financial consumer protection mandate: The Agency will continue to apply an equity, diversity and inclusion lens in the execution of its mandate, including:
  - continuing to identify and understand the diverse needs of target population groups, such as persons with disabilities, through data collection and research;
  - through implementing the National Financial Literacy Strategy 2021–2026, collaborating and engaging with community-based organizations serving diverse audiences to validate research findings, understand needs, and develop and user-test resources to better serve their audiences;







- through implementing the National Financial Literacy Strategy 2021-2026, reflecting the needs of diverse demographics, such as persons with disabilities, in the development of consumer information, programs, and experimental interventions;
- engaging and collaborating with other government departments, external partners, and industry to contribute to research and policy analysis of systemic inequities in the financial sector; and
- leveraging ongoing research to inform the supervision of financial consumer protection obligations, giving consideration to the potential implications for diverse population groups.

These prevention measures will continue to sustain the Agency's high-performing workforce and help to ensure that its employees, persons seeking employment with FCAC, and visitors to its physical premises are treated with dignity and respect in an inclusive, barrier-free environment. Also, these sustained efforts will create a more accessible, inclusive, and effective financial ecosystem that supports diverse Canadians in meaningful ways.