



# The Privy Council Office Accessibility Plan 2023-2025



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# Accessibility Plan

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## General

### Background

The Privy Council Office (PCO or department) has developed a comprehensive departmental Accessibility Plan. This plan is part of the PCO's continued commitment to equity, diversity, and inclusion (EDI) and compliance with the *Accessible Canada Act (ACA)*.

The ACA is the Government of Canada's federal legislation to create a barrier-free Canada by 2040. The ACA requires regulated entities to identify barriers and develop actions to eliminate barriers across the following seven accessibility priority areas:

- employment
- built environment
- information and communications technologies
- communication, other than information and communication technologies
- the procurement of goods, services and facilities
- the design and delivery of programs and services, and
- transportation

The Act requires all regulated entities, including government departments such as the PCO, to do the following:

- develop and publish an accessibility plan
- implement a process to receive and respond to feedback on accessibility and on the plan itself in a timely manner, and
- publish annual progress reports to communicate progress made against the plan

The ACA includes the key principle “**Nothing Without Us**”, which means that persons with disabilities should be consulted when developing laws, policies and programs that impact them. The PCO recognizes the importance of consulting with persons with disabilities in the development of its accessibility plan and ongoing evaluation of the plan's effectiveness.

### About the Privy Council Office

The PCO serves Canada and Canadians by providing advice and support to the Prime Minister, portfolio ministers, and Cabinet. Led by the Clerk of the Privy Council, the department helps the government in implementing its vision, goals, and decisions in a timely manner.

The PCO exists to:

- support the development and implementation of the Government of Canada's policy and legislative agendas
- coordinate responses to issues facing the Government and the country, and
- support the effective operation of Cabinet

### **Accessibility statement**

At the PCO, we believe that everyone should be treated with respect and dignity, which is why our Accessibility Plan is so important. Our plan demonstrates the department's commitment to creating a barrier-free experience for persons with disabilities through deliberate action in the PCO's applicable accessibility focus areas. The plan will make sure the department remains compliant with the ACA, but more importantly foster a culture of accessibility and disability inclusion.

### **Guiding principles**

We have established the following guiding principles to help us achieve our vision:

- **foster a culture of inclusion** where persons with disabilities feel welcomed, safe, and comfortable being themselves day to day
- **create a barrier-free experience** for all employees and stakeholders with disabilities
- **achieve continuous improvement** in our plan and initiatives through listening, engaging with and responding to the feedback of persons with disabilities, and
- strive to **close the persons with disability representation gap**

### **Feedback process and contact information**

The PCO has a [\*feedback process\*](#) to accept feedback relating to accessibility and the accessibility plan. You can submit feedback by contacting:

Director, Equity, Diversity, Inclusion and Accessibility

- [\*Accessibility feedback form\*](#)
- Email: [accessible@pco-bcp.gc.ca](mailto:accessible@pco-bcp.gc.ca)
- Telephone: 613-957-5153
- Mail: 85 Sparks Street, Ottawa, (Ontario) K1A 0A3

You can provide contact information or submit feedback anonymously. The PCO is only able to acknowledge receipt and respond directly to feedback if contact information is provided.

### **Alternate formats**

You can request an alternate version of our feedback process description, accessibility plan or progress reports by email at [accessible@pco-bcp.gc.ca](mailto:accessible@pco-bcp.gc.ca) or telephone at 613-957-5153.

Formats available:

- print
- large print (larger and clearer font)
- braille (a system of raised dots that people who are blind or who have low vision can read with their fingers)
- audio (a recording of someone reading the text out loud), and
- electronic formats that are compatible with adaptive technology

### **An overview of the department's accessibility plan**

The PCO's Accessibility Plan represents the commitments the department is making to address the most significant known accessibility barriers within our organization. The PCO identified barriers through consultation with management and departmental employees. This consultation included obtaining feedback directly from employees with disabilities through:

- consultations with the Persons with Disabilities Focus Group, and
- a departmental accessibility survey to seek feedback on lived experiences and accessibility barriers

Refer to the [Consultations section](#) of this Plan for more details on the consultations performed.

The department identified barriers across accessibility areas. These barriers represent both systemic themes and individual employee experiences. The PCO used the barriers reported by employees as the foundation for the development of commitments, which include:

- implementing strategies to recruit, onboard, retain and develop employees with disabilities
- enhancing existing accommodations processes to improve the experience for persons with disabilities

- reviewing and adjusting departmental offices based on universal accessibility principles and Canadian Standards Association (CSA) standards
- reviewing the information management (IM) and information technology (IT) environment holistically to provide a barrier-free experience
- improving accessibility of communications and interactions between all department stakeholders, and
- fostering increased dialogue and education about disability inclusion

The department aims to embody a culture of continuous improvement. As the PCO monitors the implementation of the plan, we will continue to seek feedback from persons with disabilities to ensure it achieves the desired impact and results.

### **Accessibility areas included in the accessibility plan**

Our plan focuses on five priority accessibility areas we believe are critical to achieving our accessibility vision and creating a barrier-free environment for our employees and stakeholders:

- employment
- the built environment
- information and communications technologies
- communication, other than information and communication technologies, and
- the procurement of goods and services

Given the nature of the PCO's mandate and operations, the ACA's federal transportation network priority area, and design and delivery of public facing programs and services priority area are not applicable.

## **Areas described under section 5 of the Accessible Canada Act (ACA)**

### **Employment**

#### **Where is the PCO now?**

The PCO is committed to providing persons with disabilities equal participation in every aspect of employment. We continue to monitor employee self-identification data to measure the department's effectiveness in recruiting, retaining, and promoting persons with disabilities.

We have seen a steady increase in the number of employees self-identifying as having disabilities. A representation gap currently exists when compared to workforce

availability (WFA). As of September 2022, the department had 5.2% representation of persons with disabilities vs. 8.8% WFA. (Source: 2016 Census and the 2017 Canadian Survey on Disability). This gap fluctuates based on business area and level within the department. The PCO is continuing to take steps to foster an inclusive culture and encourage employees to self-identify their disabilities.

The PCO has taken actions to increase the recruitment, onboarding, retention, promotion, and inclusion of persons with disabilities within the organization, specifically:

- **Partnering with LiveWorkPlay in the execution of a recruitment plan for the last four years.** Through this partnership, we have supported persons with intellectual disabilities in developing skills and experience needed to access employment opportunities.
- **Developing a guide to support the recruitment of persons belonging to equity deserving groups.** This guide, along with our EDI strategy will continue to help the department in diversifying recruitment channels and recruiting more persons with disabilities.
- **Forming the Persons with Disabilities Focus Group to identify barriers and recommend solutions to improve inclusion.** The Focus Group will play an important role in providing feedback on the department's accessibility efforts and creating more dialogue around disability inclusion.
- **Continuing to provide a defined accommodations process to support employee accommodations needs.**

## What we heard

We heard that effective and timely accommodations are critical to supporting some persons with disabilities in their roles. Employees shared the importance of a defined, centralized, transparent, and efficient process. This includes transparent communication and engagement during the process.

We also heard about the importance of education and awareness about accessibility in creating a culture of disability inclusion. Employees and management shared a desire for increased dialogue and learning around accessibility and disability inclusion. The PCO recognizes that this commitment to learning is essential as the department seeks to eliminate existing barriers.

## Looking forward

Looking forward, the PCO is committed to:

- active dialogue around accessibility and supporting learning on disability inclusion



- work closely with the Persons with Disabilities Focus Group in implementing the commitments within this plan
- improve the recruitment, onboarding, retention, and development of persons with disabilities through dedicated initiatives, and
- provide a barrier-free accommodations experience

## **Employment key commitments**

### **2023**

- Continue to support the Persons with Disabilities Focus Group in identifying accessibility barriers and available solutions, raising awareness about disability inclusion, and implementing initiatives to foster a more inclusive working environment
- Improve existing accommodations processes by creating a centralized and streamlined process grounded in leading practices
- Create a centralized accommodations fund to cover costs of employee accommodation requests
- Implement mechanisms to communicate the PCO's commitment to accessibility and accommodations throughout the candidate recruitment process (e.g., updating job postings templates, communication templates, meeting invites etc.)
- Continue to regularly collect and track employee self-identification data to evaluate the effectiveness of strategies and initiatives

### **2024**

- Perform an accessibility and disability inclusion learning needs assessment to identify learning needs and explore available training
- Design and implement new talent strategies to hire, develop and retain more persons with disabilities
- Continue to diversify the talent pipeline by building upon existing partnerships with external organizations focused on employing persons with disabilities
- Review the onboarding process with a pan-disability lens (e.g., make sure onboarding process and resources are inclusive of employees who are neurodiverse or have other invisible disabilities)

### **2025**

- Based on the results of the learning needs assessment, provide accessibility and disability inclusion training to all employees, managers and executives

## **Built environment**

### **Where is the PCO now?**

The PCO is on a journey to improve the universal accessibility of all departmental offices. As we seek to enhance accessibility, we are also balancing our heritage, sustainability, and security commitments. The PCO has taken steps over the past two years to improve workspace accessibility, including providing:

- ergonomic chairs
- desks with sit-stand flexibility, and
- accessible features whenever possible during new fit-up projects

Universal accessibility (UA) audits of departmental offices are underway by Public Services and Procurement Canada (PSPC) and the PCO. The goal of the audits is to assess compliance with UA Best Practices and Canadian Standards Association (CSA) standards for accessibility. While the audits are an ongoing activity, some early recommendations include:

- accessibility improvements to illumination
- heritage stairs and handrails
- main entrance access
- wayfinding, and
- signage

Some opportunities to improve accessibility within secure spaces are at odds with security requirements and the PCO will work to balance both these priorities. The PCO will continue to work closely with PSPC in the performance of the audits, monitor ongoing UA compliance and support improvements as needed.

### **What we heard**

Employees shared positive feedback about workspace features such as:

- ergonomic chairs
- accessible doors, and
- clear instructions for using video systems in conference rooms

While some departmental employee survey respondents who self-identified as having a disability shared that they do not have difficulties accessing or navigating PCO offices, others reported challenges. Barriers identified include:

- accessing accessible public parking
- washrooms and elements
- moving through doorways due to lack of electronic buttons
- gaining access to buildings (key card and code entry), and
- using signage and wayfinding (entrances, workspaces, and elevators)

Some employees also shared opportunities for the built environment to be improved to better support neurodiverse employees. For example through sensory-friendly workspaces and designated areas with adjusted lighting and limited distractions.

### **Looking forward**

The PCO will:

- continue to work with PSPC to evaluate the accessibility of departmental offices
- embed UA Best Practices and CSA Standards to create an accessible and inclusive environment for all employees
- monitor and address accessibility barriers within the offices and workspaces
- review existing evacuation plans to make sure alternative supports are available for individuals with disabilities, and
- support employee needs for sensory-friendly workspaces through adjustments made as part of the department's accommodations process

### **Built Environment key commitments**

#### **2023**

- Review emergency and evacuation plans for accessibility and include alternative supports for employees or visitors with disabilities. Evaluate the experience of persons with disabilities during practice drills
- Improve existing Occupational Health and Safety (OHS) built environment inspection process by including checklist items to monitor the ongoing accessibility of all departmental offices
- Improve existing accommodations processes by creating a centralized and streamlined process grounded in leading practices
- Create a centralized accommodations fund to cover costs of employee accommodation requests
- Identify and communicate list of nearby accessible parking. Identify and communicate accessible pick up and drop off locations at each PCO office

## 2024

- In partnership with the PSPC, continue to evaluate the accessibility of all departmental offices against Universal Accessibility Best Practices and CSA Standards for accessibility. Develop plans for improvement as needed

## Information and communication technologies

### Where is the PCO now?

#### Web content

- The department's Government of Canada public-facing website, including all new published content conforms with the Treasury Board Standard on Web Accessibility
- The PCO publishes content in HTML format and offers alternate formats upon request. Alternate formats include print copies, audio versions and other options

#### Social media

- The PCO continues to improve accessibility and inclusion within the department's social media presence. Some examples include alternate text for select photos and the use of inclusive language in communications
- The PCO has identified an opportunity to increase accessibility by including alternate text for all photos and plain text language in all communications as a standard practice

#### Other information and communications technology

- The department uses tools as needed to make digital assets and content more accessible
- The PCO does not currently have a formalized process for ensuring all existing and new digital content is accessible
- There is an opportunity to develop a comprehensive information and communications technology accessibility strategy. This will help ongoing alignment with digital accessibility standards across all corporate information and communication technologies
- There is also an opportunity to embed digital accessibility into the procurement and development of all future digital assets

## IT accommodations

- The PCO has an IT accommodations process that supports all employees in accessing information and communication technologies to support performance in their roles based on individual needs
- The PCO has an opportunity to better communicate and streamline the process to improve employees with disabilities' experience and provide accommodations in a timely manner

## What we heard

The PCO's IT accommodations process supports employees in accessing assistive technology needed to be successful in their roles. Some employees with disabilities shared positive experiences relating to:

- interacting with the service desk
- services provided, and
- effectiveness of the assistive technology received

Some employees with disabilities reported opportunities to improve:

- the timeliness of IT accommodations
- seamlessness of the process
- transparency in communication
- employee involvement in specification selection, and
- IT employees training on helping with specialized technology accommodations

## Looking forward

The PCO is committed to:

- developing a formalized digital accessibility strategy to help achieve the department's long-term digital accessibility objectives, and
- improving existing IT accommodations processes to provide a barrier-free experience

## Information and communication technologies key commitments

### 2022 (ongoing)

- Continue to ensure conformance of the PCO Government of Canada public-facing website and web applications with WCAG 2.0 AA

## 2023

- Improve existing accommodations processes by creating a centralized and streamlined process grounded in leading practices
- Create a centralized accommodations fund to cover costs of accommodation requests
- Develop a comprehensive catalogue of approved assistive technology to streamline and expedite IT accommodations process. Include process for confirming technology specifications with requesting employees
- Provide training to front line IT employees on supporting Persons with Disabilities with accessing and setting up assistive technology
- Implement the Government of Canada's digital Workplace Accessibility Passport. The Passport helps address the obstacles federal public service employees and applicants with disabilities face in getting the tools, supports and measures to perform at their best and succeed in the workplace
- Assess WCAG 2.0 AA compliance for websites and web applications of entities the Privy Council Office supports
- Continue to make sure the department's social media presence is inclusive and accessible to the public. For example, consistently including alternate text for photos and the use of plain and inclusive language in communications. Contribute to setting of a Government of Canada standard for social media accessibility and disability inclusion
- Create a long-term information management and information technology accessibility plan to support accessibility across all digital assets

## **Communication, other than information and communications technologies**

### **Where is the PCO now?**

The department offers alternate communication formats to the public or employees upon request, such as plain text, print copies and audio versions.

The PCO strives to provide the following for department events:

- interpreters
- translations
- transcriptions, and
- materials in advance

The PCO must continue to develop relationships with a broader range of alternate communication format providers to provide timely access when needed.

Within the Communications and Consultations Secretariat, the Editing Services team provides plain language editing and consultation services in both official languages. The editing process includes:

- reviews for inclusive and ableist language, and
- recommendations for structural changes to make documents more accessible

To raise awareness about accessibility and disability inclusion, the PCO has:

- recognized National Accessibility Week and International Day of Persons with Disabilities on an annual basis
- delivered events to promote neurodiversity inclusion, and
- formed the Persons with Disabilities Focus Group to foster increased dialogue on disability inclusion

The department has identified opportunities to:

- improve communication about accessibility
- increase employee and management awareness of existing barriers, and
- increase organizational dialogue about inclusion of persons with disabilities

We have an EDI Corner within the department's intranet which provides employees with resources and guidance. There is an opportunity for the PCO to provide increased resources and guidance relating to accessibility, including guidance relating to:

- plain language writing
- inclusive communication, and
- accessible meetings

### **What we heard**

We heard that meeting option flexibility, including the ability to attend meetings virtually has positively contributed to a more inclusive environment. This appears particularly true for employees with physical and visual impairments, and for neurodivergent employees. Employees identified an opportunity for the PCO to embed this flexibility more consistently across the organization.

We heard from some employees that there is a perception that the PCO is committed to equity, diversity and inclusion and is beginning to foster more dialogue around accessibility. Employees shared a desire for increased communication about the PCO's commitment to accessibility and resources to support the inclusion of persons with disabilities.

Some employees with disabilities also reported:

- challenges with inaccessible documents and templates, and
- opportunities to improve accessibility within departmental communications, initiatives and events (e.g., providing written material in advance of meetings, recording meetings)

### **Looking forward**

The PCO will focus on increasing access to information, resources and guidance relating to accessible communication. These commitments will complement the actions taken to improve the accessibility of information and communication technology. Together these commitments will improve accessibility within all communications.

## **Communications, other than information and communications technologies key commitments**

### **2023**

- Develop and implement an accessibility communication strategy to foster a culture of accessibility and disability inclusion
- Build upon past initiatives and deliver events focused on raising awareness about disability inclusion
- Increase employee awareness of accessibility standards and resources by creating an internal hub within the “EDI Corner” of the intranet (including the accessibility plan, accessibility guides and other resources)
- Develop and implement clear accessibility standards and practices for large events and meetings (both in-person and virtual). This includes establishing processes to understand participant accommodations needs in advance to events or meetings
- Create a checklist to support compliance with large events and meetings accessibility standards
- Update all the PCO templates to follow accessibility standards



## 2024

- Provide guidance to employees on accessible communication techniques and inclusive practices
- Provide and communicate toolkit to support plain language writing

## The procurement of goods and services

### Where is the PCO now?

The PCO procures good and services from suppliers when needed and follows PSPC procedures. As needed, Requests for proposals (RFPs) are issued through the Government of Canada's buyandsell.gc.ca site using standard Government of Canada templates.

The PCO has identified opportunities to:

- improve communication of the department's commitment to accessibility
- increase supplier awareness of the department's accommodation processes, and
- upskill the procurement team's understanding of accessible procurement leading practices. This includes recommended practices for supporting and communicating with suppliers with disabilities

### Looking forward

The PCO will:

- provide guidance to employees involved in procurement to increase their knowledge of accessible procurement practices
- review the templates, forms, documents and other communications used in the procurement process to ensure accessibility, and
- clearly communicate the department's accommodations processes to suppliers

## Procurement key commitments

### 2023

- Implement a mechanism for communicating the PCO's commitment to accessibility and information about the accommodations process to suppliers
- Review and update the procurement process, including documents, forms, templates, and communications for accessibility

## 2024

- Provide accessibility guidance to the procurement team on leading practices for accessible procurement and supporting suppliers with disabilities

### **The design and delivery of programs and services**

This ACA priority accessibility area relates to eliminating and preventing barriers to enable receipt of services that are accessible to all.

The PCO supports the Prime Minister and Cabinet in helping the government implement its vision, goals, and decisions in a timely manner. The PCO is not a front-line service department which provides services to Canadians.

The PCO considered opportunities for accessibility as it relates to supporting the Prime Minister and Cabinet and determined that opportunities for improvement are covered by the information and communication technologies, communication and procurement accessibility areas in this plan.

### **Transportation**

This ACA priority accessibility area relates to eliminating and preventing barriers within the federal transportation network. The PCO has not included this area in the scope of the accessibility plan given the nature of the PCO's mandate and operations.

### **Consultations**

The principle of "Nothing without us" recognizes that persons with disabilities are equal participants in all areas of life and should contribute to all decision-making on:

- policies
- programs
- practices, and
- service delivery

The PCO consulted with persons with disabilities throughout every step of the accessibility plan development process. We consulted persons with disabilities to:

- identify barriers
- develop the organization's accessibility vision, and
- develop action plans for each priority accessibility area

The PCO's approach to consultation included:

- discussions with priority accessibility area leads
- consultations with the Persons with Disabilities Focus Group
- performance of an accessibility survey
- collaboration with other federal departments, and
- consultation with external subject matter advisors

The PCO took an accessible approach to consultation. The approach included the accessible design of the survey and offering multiple ways for departmental employees to share feedback.

### **Consultations with persons with disabilities focus group**

The PCO assembled a Persons with Disabilities Focus Group in September 2022. The Focus Group consists of employees with both visible and invisible disabilities. The department formed the Focus Group following a callout sent by email looking for employees interested in joining the group. The Focus Group will play a consultative role working with key partners to promote disability inclusion in:

- recruitment
- onboarding
- employment and retention, and
- advancement

Moving forward, the Focus Group will also:

- provide persons with disabilities with information about EDI initiatives at the PCO, and
- support the overall Employment Equity and Diversity Advisory Committee (EEDAC)

The Focus Group currently consists of 13 employees, along with the Persons with Disabilities and Visible Minorities Co-Champion. The Focus Group was consulted in Fall 2022 during the development of the PCO's accessibility plan. Focus Group sessions were conducted to gather members' input to understand barriers and identify actions to address identified barriers. The Focus Group will continue to be consulted regularly for feedback on the implementation of the plan.

### **Employee accessibility survey**

An anonymous organization-wide accessibility survey was performed to seek feedback from PCO employees on accessibility barriers experienced relating to:

- employment
- built environment
- information communications technology, and
- communications, other than information communications technology

The PCO received more than 250 responses to the accessibility survey. The barriers identified, along with barriers identified by the Persons with Disabilities Focus Group were reviewed together and formed the basis for the PCO's development of accessibility commitments.

### **Leveraging Public Services and Procurement Canada (PSPC) and Shared Services Canada (SSC) guidance and resources**

The PCO leveraged the expertise and direction of PSPC and SSC with respect to certain priority accessibility areas. The PCO leveraged past work performed and guidance from both departments in the development of the accessibility plan.

### **Consultations with external subject matter advisor**

The PCO consulted with accessibility subject matter advisors from Deloitte Canada. These consultations enabled the PCO to learn and identify leading accessibility practices to consider in the development of the accessibility plan.

## Glossary

### Accessibility

The degree to which a product, service, program, or environment is available to be accessed or used by all.

### Accommodation

Any change in the working environment that allows a person with functional limitations in their abilities to do their job. Changes can include:

- adjustments to the physical workspace
- adaptations to equipment and tools
- flexible work hours
- job-sharing
- relocation of the workspace within the greater workplace
- the ability to work from home
- reallocation or exchange of some non-essential tasks for others, and
- time off for medical appointments

Accommodations (adjustments) can be temporary, periodic, or long-term, depending on the employee's situation or changes in the workplace.

### Barrier

Anything that hinders the full and equal participation in society of persons with an impairment. This includes:

- physical
- mental
- intellectual
- cognitive
- learning
- communication or sensory impairment, or
- a functional limitation

Barriers can be physical, architectural, technological, or attitudinal. (Source: Accessible Canada Act)

## **Disability**

Any of the following impairments that in interaction with a barrier, hinders a person's full and equal participation in society:

- physical
- mental
- intellectual
- cognitive
- learning
- communication or sensory impairment, or
- a functional limitation

(Source: Accessible Canada Act)

## **Employee**

A person employed by the Privy Council Office

## **Persons with disabilities**

Persons who have a long-term or recurring physical, mental, sensory, psychiatric, or learning impairment and who:

- consider themselves to be disadvantaged in employment by reason of that impairment, or
- believe that an employer or potential employer is likely to consider them to be disadvantaged in employment by reason of that impairment

Persons with disabilities include persons whose functional limitations owing to their impairment have been accommodated in their current job or workplace. (Source: Employment Equity Act)

## **Self-identification**

Self-identification is the term used for the collection of employment equity information voluntarily provided by employees, under the authority of the Employment Equity Act. The information is used for the purposes of analyzing and monitoring the progress of employment equity groups and for reporting on workforce representation. (Source: Public Service Commission of Canada Self-Declaration Information)

**Workforce availability**

For the core public administration, workforce availability refers to the estimated availability of people in designated groups as a percentage of the workforce population. (Source: Employment Equity in the Public Service of Canada for Fiscal Year 2017 to 2018)