

# Accessibility Plan

OFFICE OF THE CORRECTIONAL INVESTIGATOR  
2023-2025

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## A. General

In July 2016, the Government of Canada (GC) began consultations with more than 6,000 Canadians in order to determine what an accessible Canada means to them. As a result of these consultations, Bill C-81: An Act to Ensure a Barrier-Free Canada, was tabled in June 2018. The *Accessible Canada Act*, which aims to make Canada a barrier-free country by January 1, 2040, came into force in July 2019. In order to attain that goal, all GC organizations are required to proactively identify, remove and prevent barriers in the following seven (7) priority areas:

- employment
- the built environment (buildings and public spaces)
- information and communication technologies
- communication, other than information and communication technologies
- the procurement of goods, services and facilities
- the design and delivery of programs and services
- transportation (airlines, as well as rail, road and marine transportation providers that cross provincial or international borders)

In light of various studies conducted since 2017, it is evident that the public service as a whole has some work to do to in terms of improving representation in the public service and ensuring that persons with disabilities can participate fully and meaningfully in the workplace. The GC's [Accessibility Strategy for the Public Service of Canada<sup>i</sup>](#) (the GC Strategy) lays out a vision for becoming the most accessible and inclusive public service in the world.

### The Strategy's guiding principles

- "Nothing about us without us" – persons with disabilities are involved in the design and implementation of the Strategy
- Collaboration – GC organizations work in collaboration with each other, with bargaining agents and with other public, private and not-for-profit organizations
- Sustainability – the Strategy prioritizes actions that will have an enduring impact
- Transparency – the Strategy is developed and implemented transparently; and GC organizations will report openly and transparently on their efforts to remove barriers

### The GC Strategy's goals

Five goals are key to realizing the vision:

1. Employment – Improve recruitment, retention and promotion of persons with disabilities
2. Built environment – Enhance accessibility
3. Technology – Make information and communications technology usable by all
4. Services – Equip public servants to design and deliver accessible programs and services
5. Culture – Build an accessibility-confident public service

In addition to the publication of GC organizations' first Accessibility Plan, the *Accessible Canada Act* has the following planning and reporting requirements:

- **Prepare and publish accessibility plans**
  - Develop accessibility plans to identify, remove and prevent barriers in the priority areas in their:
    - policies
    - programs
    - practices
    - services
  - update organization plans every three years or as specified in regulations
  - consult people with disabilities when creating and updating organization plans
- **Establish a feedback process**
  - Build internal capacity to receive and deal with feedback about accessibility within the organization
- **Prepare and publish progress reports**
  - Issue regular progress reports describing the actions the organization has taken to implement these accessibility plans, including the feedback received and how the organization took the feedback into consideration
  - Consult people with disabilities when preparing progress reports

These requirements help ensure that accessibility is an ongoing priority and that all GC organizations are continuously improving and implementing inclusive design and working towards an accessible by default end state. The responsibility/accountability for accessibility will no longer be placed on persons with a disability but rather with all functional groups within GC organizations. The GC will establish proactive mechanisms to address accessibility systemically, from the outset.

## B. OCI Context

The Office of the Correctional Investigator (OCI or “the Office”) is a micro agency of 40FTEs with one program dedicated to conduct investigations of complaints directed to the Correctional Service of Canada by federally incarcerated individuals or supervised offenders in the community, and carries out systemic investigations of issues that affect large numbers of federal offenders. The OCI reviews all Correctional Services of Canada investigations of deaths in custody and serious bodily injury cases to ensure Correctional Service of Canada compliance with law and policy. The Office also conducts reviews of all use of force incidents. The OCI’s investigative activities support a safe, lawful and humane federal correctional practice to ensure that federal correctional decisions and practices are in compliance with human rights, law, policy, and are fair.

As a separate agency, the OCI’s under the Institution Schedule I.1 and of the HR Schedule IV of the Financial Administration Act (FAA).

### Accessibility Approach

As a micro-agency of 40 FTE, OCI was not required to report on metrics such visible minority and disability. Therefore, to identify staff needs and tailor the organizational accessibility plan, the Office will apply a two-phased approach:

- First, using the data collected from other organizations across government as well as relevant information collected through Public Service Employee Surveys, Occupational

Health and Safety Inspections, and in-house Exit and Stay interviews, the following can be identified as barriers to people with disabilities:

- Disabilities and the barriers faced by persons with disabilities are not well-understood.
  - There is reluctance or lack of awareness by some employees to self-identify as having a disability.
  - There is reluctance or lack of awareness of their rights by some employees to request accommodation.
  - Commonly noted barriers to full participation for persons with a disability can include inaccessible meetings, resources and documents (including email, internal websites, work-related information, software).
  - There is a shortage of internal expertise in creating or procuring accessible tools and documents, or leading accessible meetings.
  - The burden is often placed on the employee to research possible solutions and accommodation, especially for IT equipment.
  - Processes for procuring adaptive or ergonomic equipment, software, tools can be long and unclear.
  - There is no existing formal process to provide, in a timely manner, alternative formats and communication supports upon request by a user or employee.
  - Accessibility is not deliberately considered when new policies and practices are put in place.
  - Change initiatives tend to focus on fixing problems as they are identified, rather than starting from an expectation of accessible design.
  - With the adoption and development of a hybrid approach to the workplace, there is opportunity now to re-evaluate the built environment in planning the return to a physical office.
- Second, using the initial analysis and bases of the current Plan, the OCI commits to increasing awareness and promote self-identification, as well as hold engagement and consultation opportunities with the very few employees who have self-identified as persons with disabilities. The engagement activities will leverage existing services such as the Office of the Ombuds of Mental Health and Well-Being for Small Departments and Agencies to support employees with anonymous participation while encouraging them to feel safe in communicating their accommodation needs. Additionally, the office will seek subject matter support in building awareness through established mandatory training for all OCI employees on accessibility, accommodation and common barriers faced by persons with disabilities.
  - The consultation and engagement approach will also solicit feedback on this Plan and any early outcomes in order to ensure that specific gaps and issues of top priority for current OCI staff are considered and are addressed.
  - Under the OCI strategic priority: OCI as an Employer of Choice, the Office will seek a Champion for Accessibility who identifies as a person with a disability, to establish and promote OCI's accessibility objectives, open a channel for continuous feedback, and expend OCI's access to accommodation tools and services. The Champion will work

closely with the diversity, equity and inclusion Champion in contributing to the strategic priority: OCI as an Employer of Choice.

- Given its size, OCI does not have internal resources and capacity to meet all of its accessibility goals. To address this, OCI Accessibility Champion will network with established communities of practice, to take stock and assess existing services that may be of interest for its employees.
- Over the next year, OCI will also consult and explore with other departments and agencies with similar size and mandate, on how to address accessibility needs of its stakeholders and of federally incarcerated individuals.

### Feedback process

The *Accessible Canada Act* requires organizations to establish a departmental process for receiving and dealing with feedback regarding the implementation of the accessibility plan. The OCI will establish channels for employee feedback through its exit and stay interview processes.

The Office is dedicated to continuous improvement and aims to deliver accessible services to our employees, collaborators and stakeholders. The Accessibility Champion will be responsible to regularly monitor and evaluate the feedback and report quarterly to the OCI management table to ensure its consideration in future plans, when possible.

For questions, feedback or suggestions, please contact the OCI by:

- calling OCI 1-877-885-8848
- sending your feedback by mail to the attention of the Correctional Investigator Office of the Correctional Investigator Canada, PO Box+ 3421, Station D, Ottawa, Ontario K1P 6L4Canada
- sending your feedback by fax to 613-990-0563
- sending an email to: [org@oci-bec.gc.ca](mailto:org@oci-bec.gc.ca)
- scheduling a stay interview with the Small Department and Agencies Ombuds (for OCI employees only)

## C. Priority areas identified by the *Accessible Canada Act*

The OCI plans to address the Government of Canada's Accessibility Strategy and its goals, by contribution to the following areas:

### 1. Employment

The Office is dedicated to implementing government-wide initiatives and increasing representation of persons with disabilities across all occupational groups and levels by ensuring that removing and preventing barriers to recruitment, retention, and promotion of persons with disabilities are priorities.

The OCI will start by focusing on the following employment barriers commonly identified through government wide consultations:

- General misunderstanding of disabilities and barriers for people with disabilities;

- Misunderstanding and lack of awareness of tools for hiring, retaining, promoting and supporting persons with disabilities; and,
- Employee reluctance to self-identify as a person with disability and seek accommodation, if and where/when required.

In order to break down these barriers and become a more accessible workplace, the OCI will:

- Build accessibility awareness and capacity within the organization by
  - Naming its Accessibility Champion to engage with interdepartmental networks, OCI employees and support the implementation of this plan, as well as further the goals of the *Accessible Canada Act*;
  - Adding related Government of Canada-focused training to its mandatory training plan for all employees for 2023-24;
  - Engaging persons with disabilities and all OCI staff to solidify a culture of continuous improvement that supports diversity and inclusion. This will include a quarterly discussion at the management table on progress on OCI's diversity, inclusion and accessibility commitments.
  - Promoting self-identification through the available tools, to ensure that representation within the Office is accurately portrayed;
  - Implementing the [Government of Canada Workplace Accessibility Passport<sup>ii</sup>](#) as a tool for employees and managers to exchange accommodation-related information and embrace a “yes by default” approach to accommodation;
  - Continuing to support flexible work arrangements that address the diverse needs of all employees, while aligning with Government of Canada obligations and organizational requirements. Managers will review and adjust flexible work arrangement agreements on a regular basis to strengthen dialogue and ensure that appropriate accommodations are in place and are working.
- Provide services and tools needed to support persons with disabilities as well as management by:
  - Assessing operational context through consultations with communities of practice, organizations with similar mandates and OCI employees to identify and secure services and tools required. This would include consultations with service providers such as PSPC, PS, CSC and SSC;
  - Promoting events and tools available to all employees and to employees with disabilities, across the federal government;
  - Adjusting our recruitment approach, where required, while ensuring the health and safety of employees;
  - Reviewing and updating our Human Resources recruitment/staffing procedures to offer hiring managers guidance, training and tools in support of staffing and accommodating persons with disabilities.

Responsible: Corporate Services, Accessibility Champion and Management

## 2. Built environment

The physical workplace can present multiple barriers to persons with disabilities, including a lack of automatic door openers, poor signage and space restrictions. In the first survey on the



development of the federal strategy, respondents also noted that physical workspaces do not account for invisible disabilities such as environmental sensitivities, chronic pain, anxiety and autism.

The OCI recognizes the importance of an accessible physical environment to support persons with different abilities. While the Office has always promoted and provided ergonomic evaluations for its employees and equipped all employees with ergonomic equipment, our capacity to re-design our offices to meet the different needs of employees in the workplace has been limited by our current office space.

Through its Occupational Health and Safety inspections, OCI recognizes there is more that needs to be done and plans to deliver on the following:

- Collaborate with PSPC and Facility Management to review its safety and resource plans with the mindset of “inclusive by design” and “accessible by default”, by
  - Completing a review of the emergency and evacuation plan with accessibility considerations, and ensuring that all employees are aware of the procedures to follow, including who to communicate with if they require additional support;
  - Adopting, in consultation with employees, an inclusive design checklist for accessibility considerations (including safety, ergonomics and signage);
  - Establishing a regular procedure using the inclusive design checklist to review its work and common spaces and work with its service providers to ensure its workplace meets accessibility requirements and employee needs.

Responsible: Corporate Services, Management

### 3. Information and Communication Technologies (ICT)

Over the past year, OCI procured the services of a subject matter consulting firm to assess its Information Management and Information Technology environment in order to identify risks and options tailored to OCI environment and context. The assessment also raised challenges that are relevant to accessibility barriers, amongst other aspects, as follows:

- Challenges faced by employees and by our very small Corporate Services team to research possible solutions and accommodation for Information Technology (IT) equipment;
- Lack of awareness and skills among employees regarding creating accessible content and generating accessible documents.

In addition to formalizing its hybrid workplace approach and in line with the recommendations stemming from the IM/IT assessment, the OCI is also:

- Reviewing and negotiating new MOUs with its service providers to modernize its IT environment and offer better technological accommodation tools and applications.
- Liaising directly with the [Accessibility, Accommodations and Adaptive Computer Technology](#) initiative at Shared Services Canada to take stock of the available services and tools as well as promote and facilitate access to short-term accommodations, adaptive technology, services, and tools for its employees.

Responsible: Corporate Services and Management

#### 4. Communications other than ICT

The OCI is dedicated to ensuring that all its communications, whether internal or external, are accessible, and available in alternative formats in a timely manner. This includes ensuring that our communications and products available to the public are in plain language, and are published in line with accessibility standards.

During 2021-22, OCI assessed its public website and identified accessibility limitations. The Office then prioritized and invested in re-designing its website to ensure that it complies to GC accessibility guidelines. The web redesign project is well underway and is scheduled to go live in June 2023.

The Office has an already established feedback mechanism from the public as it pertains to its mandate and also uses these channels for other stakeholder inquiries. These established channels with the public and stakeholders will be leveraged in order to contribute to our continued improvement of accessible external communication.

Additionally, the OCI, through its upcoming consultations with staff, will assess and explore the need to adjust its internal communications to meet the required accessibility needs.

Responsible: Corporate Services

#### 5. The procurement of goods, services and facilities

OCI's total operating budget is approximately \$889K year. The operating and maintenance budget reflected in the 2023-24 OCI Main Estimates is \$898K. Of that amount, \$575K or 64% is earmarked annually for non-discretionary operational obligations such as an ATIP consultant, memoranda of understanding with Public Safety for the delivery of internal services, and investigative mandated travel. Once these fixed costs are accounted for, the organization is left with an operating and maintenance budget of \$323K. This "discretionary" amount is required to, amongst other things, support the Office with equipment, contracting, training, supplies, and translation services.

Despite its limited procurement budget, the OCI has managed to make investments in addressing some of the identified accessibility barriers. That said, the OCI is committed to working with its procurement services provider, to the greatest extent possible, to ensure that procured goods and services are accessible by design so that Canadians with disabilities can use them without adaptation. The Office currently invested in a number of stand-up desks to allow for ergonomic adjustments with accessibility standards in mind, recognizing that employees may share work spaces, and must be able to tailor them to their own abilities and needs.

As OCI implements its hybrid workplace approach, we will continue to take into consideration barriers to accessibility and will:

- Liaise with the [Accessible Procurement Resource Centre](#)<sup>iii</sup> at Public Services and Procurement Canada for guidance on how to meet new obligations regarding the consideration of accessibility in procurement;
- Work with our service providers to develop and include a checklist for accessibility considerations in procurement justification templates, to ensure these have been taken into account for all procurement activities.

According to the government-wide consultations and assessments, a commonly raised barrier to accessibility experienced by public servants is that procuring adaptive equipment is slow and not well-supported. The OCI will work with its procurement service provider, PSPC, as well as SSC, to develop procedures and processes with respect to accommodation requests and aims to provide rapid access to accessibility tools and equipment.

Responsible: Corporate Services and Management

## 6. The design and delivery of programs and services

The GC Accessibility Strategy challenges all federal organizations to assess their programs, in consultation with persons with disabilities, to identify and remove barriers for persons with disabilities, to build accessibility into new policies and programs, and to develop data on client satisfaction from the perspective of persons with disabilities.

Consultation with larger federal organizations indicates the following common barriers in this area:

- Accessibility is not systematically or transparently considered when new policies and practices are put in place;
- Problematic to fix problems as they are identified, rather than start from an expectation of accessible design.

Due to its operational context, the OCI currently does not proactively identify or seek information about the accessibility or accommodation needs of its clients, nor does it build accessibility criteria into its internal policies and practices. In order to break down and prevent barriers in this area, the OCI will:

- Assess operational context through consultations with communities of practice, organizations with similar mandates, and OCI employees, to identify and secure services and tools required. This would include consultations with service providers such as PSPC, PS, CSC and SSC; and
- Include accessibility considerations and questions in upcoming stakeholder consultations.

Responsible: Policy and Research, Operations, supported by Corporate Services

## 7. Transportation

To deliver on its mandate, OCI investigators require regular travel to various institutions located across Canada, in sometimes in remote locations. During the first year of the Plan's implementation, the Accessibility Champion will work with the operations and policy and research groups to assess the barriers as well as mitigation approach to support persons with disabilities in the role of investigators.

## D. Consultations

As previously highlighted, the OCI is committed to involving persons with disabilities in the design and implementation of its accessibility plan moving forward, to ensure that their unique and valuable perspectives and experiences are reflected and respected.

Due to its limited capacity and lack of internal expertise, the OCI will develop the first iteration of its Accessibility Plan as a basis for meaningful internal and external consultations to identify and put in place the required tools and services to better support persons with disabilities. The Plan

therefore is grounded in feedback provided through government-wide consultation, relevant aspects of the public service employee survey and internal stay and exit meetings. Having a broader range of feedback to guide internal discussions will support an accessible organization for current and future OCI employees and stakeholders.

## E. Implementation, monitoring and reporting

In order to ensure that accessibility remains a constant priority within government, the *Accessible Canada Act* dictates that regulated entities prepare and publish annual progress reports on the implementation of their accessibility plans. These progress reports must be prepared in consultation with persons with disabilities and present the feedback received (if any) and how that feedback was taken into consideration.

The OCI plans to provide its first progress report in fiscal year 2024-25 to report on concrete progress made in achieving the commitments outlined in its Accessibility plan.

As specified in the regulations, GC organizations must publish a revised plan every three (3) years. As such, the Office is committed in revising and publishing its accessibility plan in December 2025.

## F. Glossary

### **Access to Justice**

means a people-centered approach to justice that puts consideration of the individual at the heart of Canada's rule of law, by providing access to information, programs and policies.

### **Accessibility, Accommodations and Adaptive Computer Technology**

The Accessibility, Accommodation and Adaptive Computer Technology Program of Shared Services Canada provides a wide range of services, on a cost-recovery basis, to help integrate employees with disabilities, injuries and ergonomic requirements and who require access to systems, programs, information, computers and computer resources.

### **Barrier**

“means anything—including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice—that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.”

### **Disability**

“means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment—or a functional limitation—whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.”

### **Government of Canada Workplace Accessibility Passport**

The Government of Canada Workplace Accessibility Passport helps address the obstacles federal public service employees and applicants with disabilities face in obtaining the tools, supports and measures to perform at their best and succeed in the workplace. It facilitates recruitment, retention, and career advancement for persons with disabilities. The Accessibility Passport facilitates employee mobility between GC organizations. It is meant to follow each employee and it is an evergreen document that can be updated throughout a career.

### **"Nothing about us without us"**

"Nothing about us without us" is a guiding principle used across the Government of Canada to communicate the message that no policy should be decided by a representative without the full and direct participation of the members of the group affected by that policy.

### **Self-Identification Modernization Project**

In September 2020, the Treasury Board Secretariat launched the Self-Identification (self-ID) Modernization Project to increase the accuracy, depth and breadth of the data across government. The project explored ways to reduce stigma associated with self-identification for all employment equity groups. Following extensive research and consultations, a new questionnaire was co-designed with employees from various diversity networks.

## Endnotes

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<sup>i</sup> Accessibility Strategy for the Public Service of Canada, [Accessibility Strategy for the Public Service of Canada - Canada.ca](#)

<sup>ii</sup> [Government of Canada Workplace Accessibility Passport - Canada.ca](#)

<sup>iii</sup> [Accessible procurement - Advancing socio-economic goals, increasing competition and fostering innovation - Better Buying - Buying and selling - PSPC \(tpsgc-pwgsc.gc.ca\)](#)