



Office of the Commissioner  
of Lobbying of Canada

Commissariat au lobbying  
du Canada

# Accessibility Plan 2023-2025





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## Commissioner's Message

I am pleased to present Office of the Commissioner of Lobbying's (OCL) 2022–25 Accessibility Plan (the Plan) prepared in accordance with the [Accessible Canada Act](#). The Plan sets out objectives and supporting actions that reflect OCL's commitment to accessibility to enable the full participation of its personnel, clients and stakeholders in the delivery of its activities and its mandate.

The objectives and supporting actions were established by reviewing OCL's internal and external activities, best practices, Government of Canada policies and standards, and by consulting with employees and stakeholders. The key priorities for improving accessibility include accessibility awareness, workplace accommodations, the built environment, and website accessibility.

The Plan's implementation will support OCL's core mandate by improving access to our services for stakeholders, including registrants, public office holder and members of the public with disabilities.

I wish to extend my gratitude to the Office of the Privacy Commissioner (OPC) with whom we have been IM/IT partners for several years and who kindly accepted to share their plan to assist in the preparation of the OCL's plan.

I look forward to implementing the Plan and to report annually on our progress.

**Nancy Bélanger**  
Commissioner of Lobbying

# Executive Summary

The Office of the Commissioner of Lobbying (OCL) was established in July 2008 under the [Lobbying Act](#) to support the [Commissioner of Lobbying](#). The Commissioner is an independent Agent of Parliament responsible for regulating lobbying at the federal level. The purpose of the Act is to ensure transparency and accountability in the lobbying of public office holders in order to increase the public's confidence in the integrity of government decision-making. The Commissioner's mandate is threefold:

- maintaining the [Registry of Lobbyists](#), which contains and makes public the registration information disclosed by lobbyists;
- developing and implementing educational programs to foster public awareness of the requirements of the Act and [Lobbyists' Code of Conduct](#); and
- conducting verifications and investigations to ensure compliance with the Act and the [Lobbyists' Code of Conduct](#)

The OCL supports a culture that embraces diversity and inclusion in order to enable the full participation of its personnel, clients and stakeholders in the delivery of its activities and its mandate. The Canadian legislative framework that supports diversity and inclusion was strengthened by the addition of an Act to ensure a barrier-free Canada, also known as the Accessible Canada Act (ACA), which came into force on July 11, 2019.

This document sets out the OCL's plan over the next three years for reducing barriers and preventing the introduction of new barriers in the seven priority action areas, as described in Section 5 of the Accessible Canada Act, in support of the following 10 organizational goals:

**Goal 1** – Create a culture of accessibility, where respect and inclusion are embedded in all aspects of the workplace and where all employees are empowered and supported to achieve their full potential.

**Goal 2** – Implement accessible practices to eliminate and prevent barriers to the recruitment, retention, and promotion of persons with disabilities.

**Goal 3** – Ensure that OCL staff is sufficiently equipped to deliver accessible programs and services.

**Goal 4** – Provide Canadians with barrier-free access to the OCL's programs and services.

**Goal 5** – Create a workplace free of physical barriers to improve the working environment for all OCL staff of various abilities.

**Goal 6** – Ensure that OCL staff have a safe environment to work in.

**Goal 7** – Provide accessible technology to ensure that OCL staff have access to the tools and platforms they need to perform their work.

**Goal 8** – Acquire and implement technologies that ensure that all Canadians can access OCL's programs and services.

**Goal 9** – Remove barriers for OCL communications products by creating an “accessibility by design” culture, where staff at all levels are informed and aware of accessibility by design requirements.

**Goal 10** – Share knowledge and best practices widely to reduce barriers across the public service.

## General Background

The Government of Canada (GoC) aspires to have a public service that is accessible by default for the Canadian public, government institutions and their workforce. This aspiration is rooted in the belief that an inclusive public service is more innovative, efficient and productive. The goal is to make Canada’s public service barrier-free.

The government has placed significant emphasis on improving the participation of persons with disabilities in the federal public service and in the Canadian workforce. The results of the 2017 Canadian Survey on Disability suggest that 6.2 million Canadians aged 15 and over (22% of the population) have a disability, though the actual numbers are likely higher. As a result of the physical, administrative, institutional, technological and attitudinal barriers that exist in the workplace, persons with disabilities are underrepresented in the Canadian labour force. Only 59% of Canadians with disabilities aged 25 to 64 are employed, compared to 80% of Canadians without disabilities.

As the number of people living with a physical disability is expected to rise from 2.9 million to 3.6 million over the next 13 years, this nearly doubles the pace of population growth overall. Removing barriers that prevent persons with disabilities from purchasing goods and services and accessing both business and government services and employment is critical to both improving their quality of life and ensuring that Canadian society benefits from their valuable participation.

## The Accessible Canada Act

The GoC held consultations with persons with disabilities and the ability’s community and heard from more than 6,000 Canadians about what an accessible Canada means to them. This consultation informed the creation of the [Accessible Canada Act](#) (ACA).

The ACA, which came into force on July 11, 2019, takes a proactive and inclusive approach to identifying and eliminating barriers in federal jurisdiction by 2040. It includes seven priority areas for action:

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

Under the ACA, federally regulated entities must report to the public on their policies and practices in relation to the identification and removal of barriers by publishing their accessibility plans, feedback processes and progress reports.

Each department, agency and federally regulated employer is also required to develop an accessibility plan and report on progress made against this plan annually, starting in December 2022.

## Government of Canada Context

The ACA will guide government departments, agencies and federally regulated organizations in removing barriers to achieve full accessibility and in their reporting obligations to demonstrate progress.

A federal workforce that is reflective of the Canadian population is viewed as essential to the design and implementation of programs and services that are bias- and barrier-free and address the needs of all Canadians.

It is important to note that the federal government has introduced many initiatives over the years to increase the representation, promotion and retention of employment equity group members and to systematically reduce any barriers. Federally regulated organizations, including all federal government departments and agencies, undertake these actions consistent with the [Employment Equity Act \(EEA\)](#), which covers visible minorities, Indigenous peoples, persons with disabilities and women.

As a country, Canada is recognized globally for its support of diversity. Along with the ACA and the EEA, the [Canadian Charter of Rights and Freedoms](#), the [Canadian Human Rights Act](#), the [Pay Equity Act](#), the [Canadian Multiculturalism Act](#), and the [Official Languages Act](#) are also part of the legislative framework supporting diversity and inclusion in Canada.

## The OCL Context

The Office of the Commissioner of Lobbying of Canada (OCL) ensures transparent and ethical lobbying by administering the [Lobbying Act](#) and the [Lobbyists' Code of Conduct](#). Its responsibilities include maintaining a searchable registry of information reported by lobbyists, providing education to stakeholders and verifying that lobbyists comply with requirements.

The OCL is a micro-organization of 33 skilled, talented and dedicated professionals who work to achieve our mandate of ensuring transparent and ethical lobbying.

While the OCL has promoted employment equity for many years, management has recognized the need to strengthen recruitment and workplace initiatives in relation to persons with disabilities and work towards building a more diverse workforce, a more accessible work environment and a more equitable approach to working with Canadians.

The OCL's aim with this accessibility plan is twofold:



- identify, remove and prevent accessibility barriers in the OCL’s delivery of services to the public, and
- continue to address the accessibility needs of its current and future employees.

## Moving Toward a More Accessible OCL

The OCL’s accessibility plan is supported by other relevant initiatives, including the Human Resources and Employment Equity, OCL Strategic Plan 2021-2024 as well as staff training on accessibility and inclusion in the workplace.

In addition, in 2020, the OCL launched its new website and ensured it met [Web Content Accessibility Guidelines](#) (WCAG) 2.1 Level AA, which are part of web accessibility guidelines published by the Web Accessibility Initiative of the W3C, the main international standards organization for the Internet. To ensure our website remains accessible and barrier free, the OCL continually reviews and improves its website content in terms of plain language and usability with a focus on key documents including forms destined for the Canadian public and highly technical or legal guidance for businesses and organizations. The OCL’s Communications team will continue to do usability testing whenever the OCL’s website is updated to ensure it is compliant with the current version of WCAG.

In addition, to foster an inclusive hiring process and following the advice of the Canadian Human Rights Commission, our human resources provider, the OCL will establish unconscious bias pre-requisite training for managers with delegated staffing authority. Central agency inventories, pools and student placement programs for persons with disabilities are considered by hiring managers to meet their staffing needs.

The OCL also provides employees with specialized accessibility equipment as required based on the results of ergonomic assessments, including oversized screens, large print keyboards, and writing assistance software.

Finally, all performance agreements include an organizational priority, with corresponding performance indicators, related to promoting and fostering diversity, equity, accessibility, inclusion and substantive equality of official languages within the OCL.

### Principles

In keeping with the “nothing about us without us” guiding principle, this plan was developed in consultation with OCL Staff, clients and stakeholders.

The sections below set out the planned activities identified by the OCL to achieve 10 accessibility goals over the next 3 years, including activities that the OCL already performs to support accessibility for Canadians and its staff.

## General

This information is provided for the purposes of providing feedback and for requesting alternative formats of the plan and/or feedback process.

This plan has been a collaborative effort on the part of the OCL Executive Management Team as well as staff, public office holders, registrants, registrant representatives and the general public. This plan is a living document and will be updated regularly as new developments take place.

Should you have any questions, please direct them to:

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## Employment

**Goal 1 – Create a culture of accessibility, where respect and inclusion are embedded in all aspects of the workplace and where all employers are empowered and supported to achieve their full potential.**

Supporting actions	Lead	Target FY
1. Promote accessibility-related tools, resources and events, including promoting and encouraging participation in activities for the National Accessibility Week.	Management	Ongoing
2. Provide accessibility learning opportunities to staff including bolstering the OCL required training curriculum with additional mandatory and recommended training.	Corporate services	2022-23
3. Promote mechanisms for staff with disabilities to share experience and raise concerns. This includes analysing and acting on feedback received through the 2022 Public Service Employment Survey and creating exit questionnaires to better identify workplace retention barriers and gaps.	Management	2023-24

**Goal 2 – Implement accessible practices to eliminate and prevent barriers to the recruitment, retention, and promotion of persons with disabilities.**

Supporting actions	Lead	Target FY
1. Leverage interdepartmental accessibility groups to acquire tools and develop accessibility expertise in staffing in consultation with the Canadian Human Rights Commission, our human resources provider.	Hiring managers & Corporate Services	Ongoing

2. Review available workforce data to gain insight into gaps for persons with disabilities. This includes analyzing staff utilization rates, staff representation rates and drop-off rates at different stages of the selection process.	Hiring managers & Corporate Services	Ongoing
3. Promote talent management programs that facilitate the participation of persons with disabilities.	Hiring managers & Corporate Services	Ongoing
4. Implement the GC Workplace Accessibility Passport* to help facilitate and streamline conversations between staff with disabilities and managers about the tools, supports and measures they require to succeed in the workplace.  *An initiative under the <a href="#">Public Service Accessibility Strategy</a> and a key project under the <a href="#">Centralized Enabling Workplace Fund</a> . The Passport originates from a recommendation made by the Persons with Disabilities Champions and Chairs Committee in 2018.	Hiring managers & Corporate Services	2022-2023
5. Implement and promote the new self-identification questionnaire designed to collect information on the composition of the Public Service workforce to comply with legislation on employment equity.	Corporate Services	2022-2023
6. Ensure onboarding practices are accessible. This includes reviewing and updating the OCL orientation program and checklist for new employees.	Hiring managers & Corporate Services	2024-2025

## The design and delivery of programs and services

The OCL has identified services that ensure transparency and accountability in the lobbying of public office holders to increase the public’s confidence in the integrity of government decision-making as follows:

- maintain a registry of lobbyists
- offer client services
- verify and investigate allegations of non-compliance
- review requests for exemption to the five-year prohibition on lobbying
- verify the compliance of monthly communications reports
- provide outreach
- maintain media relations

The goals and related activities set out below represent the next steps that the OLC is undertaking to increase the accessibility of services management practices.

**Goal 3 – Ensure that OCL staff is sufficiently equipped to deliver accessible programs and services.**

Supporting actions	Lead	Target FY
1. Ensure that training on soft skills such as unconscious bias and how to handle difficult situations is offered to public-facing staff to build awareness and understanding of persons with disabilities and accessibility issues.	Management	2023-2024
2. Dedicate more internal resources with lived accessibility experience to coach staff on issues related to accessibility.	Corporate Services	2023-2024
3. Review the services inventory with an Accessibility Lens <sup>1</sup> and ensure this inventory is posted in the Government of Canada interactive data tool, <a href="#">GC Infobase</a> , in keeping with the Policy on Service and Digital.	Management	2023-2024

**Goal 4 – Provide Canadians with barrier-free access to the OCL’s programs and services.**

Supporting actions	Lead	Target FY
1. Encourage the use of plain language for investigation reports and other OCL publications, such as guidance documents and interpretation bulletins.	Registration, Policy and Public Affairs	Ongoing
2. Conduct a study/survey to seek Canadians views on the accessibility of the OCL’s programs and services.	Corporate Services	2022-2023
3. Retain an external resource to review and assess OCL’s website, the Lobbyists Registration System, products and client touch points from an Accessibility Lens.	Registration, Policy and Public Affairs & Corporate Services	2023-2024
4. Explore solutions identified to simplify, when possible, OCL’s website, the Lobbyists Registration System, products and client touch points to ensure accessibility and usability.	Registration, Policy and Public Affairs & Corporate Services	2024-2025
5. Monitor to ensure that identified solutions have the desired effects, or whether more accessibility features can be incorporated.	Management	2024-2025
6. Further enhance the accessibility of our website by letting users know they can request content in alternative formats and provide contact information for making these requests.	Registration, Policy and Public Affairs	2022-2023

<sup>1</sup> An Accessibility Lens is a tool for identifying and clarifying issues affecting persons with disabilities used by policy and program developers and analysts to assess and address the impact of initiatives (policies, programs or decisions) on persons with disabilities.

## The built environment

The built environment can have a material impact on health and wellbeing and, if optimized, can ensure that all staff, clients and stakeholders have equal and fair access to and use of internal infrastructure.

### Goal 5 – Create a workplace free of physical barriers to improve the working environment for all OCL staff of various abilities.

Supporting actions	Lead	Target FY
1. Continue to identify and implement workstations for persons with an impairment.	Corporate Services	Ongoing

### Goal 6 – Ensure that OCL staff have a safe environment to work in.

Supporting actions	Lead	Target FY
1. Document and review evacuation plans with staff with disabilities.	Corporate Services	2023-2024
2. Discuss with Public Services and Procurement Canada and the landlord of the feasibility that smoke, fire and other emergency alarms have visual as well as auditory alerts.	Corporate Services	2024-2025

## Information and communication technology (ICT)

Central agencies and common service providers set government standards for the acquisition of software and hardware for many products and services. Their leadership is essential in moving toward more accessible infrastructure.

### Goal 7 – Provide accessible technology to ensure that OCL staff have access to the tools and platforms they need to perform their work.

Supporting actions	Lead	Target FY
1. Acquire technology with accessibility in mind.	Corporate Services	Ongoing
2. Integrate validation for accessibility into the software development life cycle.	Corporate Services	2022-2023
3. Add accessibility to the compliance assessment for new non-standard software requests, which already incorporate cybersecurity and privacy assessments, as part of the non-standard software/service request procedure.	Corporate Services	2022-2024

### Goal 8 – Acquire and implement technologies that ensure that all Canadians can access OCL's programs and services.

Supporting actions	Lead	Target FY
1. Consult the <a href="#">Accessibility, Accommodation and Adaptive Computer Technology</a> (AAACT) team on leading-edge	Corporate Services	2023-2024

technology and seek training opportunities provided by AACT. Acquisitions will be undertaken if cost benefit analysis warrants.		
2. Consult and join communities of practice through Government of Canada’s collaboration platforms to identify best practices and share lessons learned on complying with ICT accessibility requirements.	Corporate Services	2023-2024
3. Assist Canadians who require technological assistance with filling out mandatory forms and using OCL services.	Management	Ongoing

### Communication, other than ICT

The GOC community of practice indicates that communications is a system for transmitting or exchanging information, and that performance indicators are under development for accessible communications.

Government accessibility guidance suggests web material should be written to a grade 6 to 8 level. Consideration could be given to a plain language review of the current content for individuals requiring assistance in understanding and acting upon their privacy rights.

### Goal 9 – Remove barriers for OCL communications products by creating an “accessibility by design” culture, where staff at all levels are aware of requirements.

Supporting actions	Lead	Target FY
1. Encourage staff to include plain language training in their learning plans and to follow the plain language process.	Management	Ongoing
2. Ensure current employees and future hires are knowledgeable about GoC guidelines for usability and accessibility of content.	Management	Ongoing
3. Continue to ensure that the OCL website is accessible through ongoing compliance with WCAG and the <a href="#">Standard of Web Accessibility</a> .	Corporate Services	Ongoing
4. Explore methods of offering additional help to Canadians when filling out forms required to access OCL services.	Management	Ongoing

### Goal 10 – Share knowledge and best practices widely to reduce barriers across the public service.

Supporting actions	Lead	Target FY
1. Develop an OCL plain language reference guide and checklist.	Registration, Policy and Public Affairs	2023-2024
2. Share accessible communications knowledge with other GoC departments and agencies.	Registration, Policy and Public Affairs	2023-2024

## The procurement of goods, services and facilities

The OCL has entered into a Memorandum of Understanding with the Canadian Human Rights Commission (CHRC) and also retains the services of a part-time employee for its procurement-related activities. As the contracting authority for the OCL, the Executive Director, Corporate Services will ensure that procurement-related activities conducted on behalf of the OCL comply with all legal and policy requirements, including the ACA. Accessibility requirements will be part of the procurement process from the outset.

## Transportation

This section is not applicable to the OCL.

## CONSULTATIONS - METHODOLOGY

### Methodology

This Accessibility Plan aims to provide a path forward for the OCL to eliminate barriers and adapt to changing demographics and will be updated as new initiatives are introduced. Addressing improvements in the lives of OCL staff and the public with disabilities is paramount.

This plan was prepared by first completing an environmental scan to ensure understanding of central agencies and other government departments accessibility initiatives and to review existing related policies and procedures. The exercise helped identify existing practices and initiatives that could be adopted as a best practice across the organization.

OCL staff, clients and stakeholders were consulted to ensure the approach in the preparation of this plan respected the “nothing about us without us” principle. This was done through an open survey on our website. Comments and next step recommendations received were integrated in the finalization of the plan. The representatives reviewed the proposed activities to ensure the goals are articulate to be better understood by staff and management.

The OCL does not currently have a network of stakeholders in the ability’s community. The OCL largely based its own accessibility plan on the Office of the Privacy Commissioner (OPC) plan. The OPC retained the services of Excellence Canada, an independent, not-for-profit corporation that is dedicated to advancing organizational performance across Canada, to review its accessibility plan for compliance with the Accessible Canada Act.

