

Canada Development Investment Corporation

Accessible Canada Act

Multi-Year Accessibility Plan

January 1, 2023 to December 31, 2025

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Canada Development Investment Corporation ACCESSIBILITY PLAN

Accessible Canada Act

Background

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. To attain that goal, we must 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; and
- transportation (airlines, as well as rail, road and marine transportation providers that cross provincial or international borders)

The [Government of Canada's Accessibility Strategy](#) has a vision of the Government of Canada being the most accessible and inclusive public service in the world.

Guiding principles

- "Nothing without us": persons with disabilities are involved in the design and implementation of the strategy
- Collaboration: departments and agencies 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 departments and agencies will report openly and transparently on their efforts to remove barriers

Goals

Five goals are key to realizing the vision:

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

The *Accessible Canada Act* has the following planning and reporting requirements for federally regulated organizations:

1. 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 their Plans every 3 years or as specified in regulations, and
- consult people with disabilities when creating and updating their Plans

2. Set up a feedback process:

- have a way to receive and deal with feedback about their accessibility

3. Prepare and publish progress reports:

- make regular progress reports that describe the actions the organization has taken to implement their Accessibility Plans
- include information in their reports on feedback received and how the organization took the feedback into consideration, and
- consult people with disabilities when preparing their reports

General

Canada Development Investment Corporation (“CDEV”) is a federal Crown corporation incorporated in 1982 under the *Canada Business Corporations Act* (“CBCA”) to provide a commercial vehicle for Government investment and to manage commercial holdings of the Government. CDEV’s primary objective is to carry out its activities in the best interest of Canada, operating in a commercial manner. In addition to certain activities of its own, CDEV has a number of wholly-owned subsidiaries for which it is responsible: Canada Eldor Inc. (“CEI”), Canada Enterprise Emergency Funding Corporation (“CEEFC”), Canada Hibernia Holding Corporation (“CHHC”), Canada TMP Finance Ltd. (“TMP Finance”), Canada Growth Fund Inc. (“CGF”) and Trans Mountain Corporation (“TMC”).

Under the *Accessible Canada Act*, 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.

This Accessibility Plan (“Plan”) applies to CDEV and its subsidiaries CEEFC, TMP Finance, CEI and CGF as all are managed by CDEV employees in the same built environment. CHHC and TMC have prepared their own Accessibility Plans. CHHC’s Plan can be found in the Accessibility section on the CDEV website and TMC’s Plan can be found on their website.

Feedback Mechanism

The *Accessible Canada Act* requires organizations to establish a process for receiving and dealing with feedback regarding the implementation of the Accessibility Plan. CDEV will regularly monitor and evaluate feedback to incorporate into future Plans where possible.

If you have any questions, feedback or suggestions, please contact us:

Title:	Accessibility Lead Canada Development Investment Corporation
Telephone:	416-966-2221
Email:	Accessible@cdev.gc.ca
Mailing Address:	1240 Bay Street, Toronto ON M5R 2A7, Suite 302

Feedback Process:

1. Feedback will be received by either telephone (and transcribed to an accessible Word document), mail (and scanned to a pdf) or email.
2. All feedback will be saved in a designated “Accessibility Plan Feedback” electronic folder.
3. The sender of any feedback will be notified that it has been received and suggested modifications to the Accessibility Plan will be reviewed.

Alternate formats of this Accessibility Plan are available upon request. Please contact CDEV or information and support.

Executive Summary

The Canada Development Investment Corporation is a Crown corporation. As such CDEV must create a Multi-Year Accessibility Plan as required under the *Accessible Canada Act* (“ACA” or the “Act”), which came into force on July 11, 2019.

This document sets out CDEV’s Accessibility Plan for reducing barriers and preventing the introduction of new barriers over the next three-year period by identifying four overarching accessibility goals:

Goal 1 – Ensure that CDEV employees are sufficiently equipped to deliver accessible programs and services.

Goal 2 – Ensure that CDEV communications products are developed with accessibility in mind.

Goal 3 – Implement accessible practices to eliminate and prevent barriers to the recruitment, retention, and promotion of persons with disabilities.

Goal 4 – Acquire and implement technologies that ensure all Canadians can access CDEV services and products.

Accessibility Statement

CDEV strives to be barrier-free, accessible, and inclusive to all stakeholders, specifically those with disabilities. CDEV will review and develop its programs, policies, documents, and services with the intent to continually improve.

Multi-Year Accessibility Plan

A. Priority areas identified by the Act

1. Employment

CDEV is committed to removing and preventing barriers to recruitment, retention, and the promotion of persons with disabilities. Employees will be given access and training on accessibility resources and information needed in completing their responsibilities.

Actions

1. Benchmark against ACA standards for Employment and update relevant CDEV policies, guidelines and programs as needed.
 - ACA standards for Accessible Employment is targeted for 2024 publication
2. Provide additional accessibility training for specific employees on topics as identified by their role. i.e., training on WCAG 2.0 (Web Content Accessibility Guidelines), creating accessible documents and accessible recruitment (including encouragement towards people with disabilities to apply to posted job applications).

2. Built Environment

CDEV recognizes the importance of an accessible built environment. As such, CDEV will continue to work with employees, building owners, and the Government of Canada to achieve the highest level of accessibility within office location(s).

Actions:

1. Benchmark against ACA standards published for Built Environment and update relevant CDEV policies, guidelines, and programs as needed.
 - ACA standards for Built Environment, is targeted for publication in 2025
2. Ensure alternative arrangements are made available to anyone needing accessibility accommodations prior to attending a site or office.
3. Work with CDEV's lessors to incorporate accessibility best practices for all leased spaces.

3. Information and Communication Technologies ("ICT")

CDEV is advancing our technology and digital capabilities, including the website, which has been designed with accessibility in mind.

Actions:

1. Benchmark against ACA standards for ICT and update relevant CDEV policies, guidelines, and programs as needed.
 - ACA standards using European harmonized standard, EN 301 549, as a guideline is targeted for 2023 publication
2. CDEV's new website is compliant with WCAG and will be activated in early 2023. A certificate of WCAG 2.0 compliance for the new website can be found in the Annex B below. CDEV will ensure all future content posted to the website is compliant to WCAG requirements.

4. Communications other than ICT

CDEV is dedicated to working towards making its communications, whether that be internal or external, are accessible. This includes ensuring that our communications are written in plain language. In a "document heavy" environment communication is central to our services.

Actions:

1. Benchmark against ACA standard for Communication and update relevant CDEV policies, guidelines and programs as needed.
 - ACA standards for Communication is targeted for publication in 2023
2. Create standards for public-facing communications to be in plain language where necessary.
3. Evaluate current public-facing documents for clarity and plain language and provide plain language versions where necessary.

5. The Procurement of Goods, Services, and Facilities

CDEV strives to engage with third party providers who have high standards of accessibility.

Actions:

1. Benchmark against ACA standards for Procurement when published.
 - No ACA standards for Procurement are currently targeted for publication
2. Establish accessibility expectations of supplier.

6. The Design and Delivery of Programs and Services

CDEV is responsible for managing investments and corporate interests held by the Government of Canada, including making purchases and sales of assets on behalf of the Canadian Government. CDEV provides information, reports, and content available to the public on the website.

Actions:

1. Benchmark against ACA standards for Design and Delivery of Programs and Services and update relevant CDEV policies, guidelines, and programs as needed, when published.
 - No ACA standards for Design and Delivery of Programs and Services are currently targeted for publication
2. Review feedback from our external stakeholders to assess the current state of accessibility with respect to the delivery of our programs and services.
3. Build a culture where universal design is used to guide the design and delivery of CDEV's policies, guidelines services and programs.

7. Transportation

This priority area under the *Act* is not applicable to CDEV.

B. Consultations

Methodology

This Plan was prepared through consultation with subject matter experts within CDEV. CDEV consulted with persons with disabilities with respect to the Plan.

Subject Matter Experts

Subject matter experts at CDEV were consulted in facilitated focus groups. Internal stakeholders with knowledge of employment practices, procurement, facilities, digital resources, communications, and the design and delivery of public facing documents were consulted in small focus groups. Questions regarding accessibility barriers, current accommodation practices, and priorities for remediation were discussed and responses have been used to inform this Plan.

Accessible Canada Act Review Committee

The Plan was also reviewed by Excellence Canada's standing *Accessible Canada Act* Review Committee. Since 1991, Excellence Canada, a not-for-profit corporation, has been developing national organizational standards of excellence that focus on continual improvement across all business areas. Since 2009, under its People Access division, it has helped employers adopt the *Accessibility for Ontarians with Disabilities Act* regulations, recognizing the impact that accessibility has upon all the business areas of an organization. Consultation group members are individuals with a variety of lived experience with disabilities, and knowledge of a range of accessibility issues. The committee consists of members who self-identify with a disability including mobility, vision, learning disability, mental health disability and hearing loss. Committee members were provided an overview of the functions at CDEV and an advance copy of the draft CDEV Accessibility Plan. Members provided comments on the Plan format and readability, accessibility actions as outlined in the Plan, suggested timelines for actions, and specific barriers that could be encountered. Committee feedback has been incorporated into this Plan. The consultation period was November 28, 2022 to December 2, 2022.

C. Implementation, Monitoring and Reporting

To ensure that accessibility remains a constant priority within the government, the *Accessible Canada Act* dictates that regulated entities prepare and publish annual progress reports on the implementation of their Accessibility Plans. Like our Plan, progress reports must be prepared in consultation with persons with disabilities. The progress reports must also present the feedback that we received (if any) and how that feedback was taken into consideration. CDEV's first progress report will be published 12 months after the publication of our first Accessibility Plan, in December 2023.

This progress report will include updates on the actions CDEV has taken. As specified in the regulations, organizations must publish a revised Plan every three (3) years. As such, the CDEV's first revised Accessibility Plan will be published in December 2025.

D. GLOSSARY

Barrier

According to the [Accessible Canada Act](#) the definition “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

According to the [Accessible Canada Act](#) the definition “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.”

ICT (information and Communication Technology)

“an extensional term for information technology (IT) that stresses the role of unified communications and the integration of telecommunications (telephone lines and wireless signals) and computers, as well as necessary enterprise software, middleware, storage and audiovisual, that enable users to access, store, transmit, understand and manipulate information.”

Web Content Accessibility Guideline (WCAG)

The WCAG documents explain how to make web content more accessible to people with disabilities. Web “content” generally refers to the information in a web page or web application, including:

- natural information such as text, images, and sounds
- code or markup that defines structure, presentation, etc.”

The Web Content Accessibility Guidelines (WCAG) are part of a series of web accessibility guidelines published by the Web Accessibility Initiative (WAI) of the World Wide Web Consortium (W3C), the main international standards organization for the Internet. They are a set of recommendations for making Web content more accessible, primarily for people with disabilities.

Annex A: Barriers by ACA Type

The following list provides a summary of barriers identified as responses to questions asked during facilitated focus groups between CDEV stakeholders and Excellence Canada.

Employment

- Employees have decreased access and familiarity with accessibility resources and information.
- There is no written accommodation process for employees with disabilities.
- There is no advertising encouraging people with disabilities to apply for jobs.

Built Environment

- CDEV's office space can create unintentional barriers, for example heavy doors.
- Employees and visitors may not be aware of accessible features of office spaces.

Information and Communication (ICT)

- Content added to the webpage must be created in an accessible manner.
- There is limited internal expertise on accessibility best-practices.

Communications other than ICT

- There is no formal process to provide alternative formats and communication supports upon request by a user or employee.
- Technical and/or sector specific language is used in public facing reports and documents.

Procurement

None

Design and Delivery of Programs and Services

None

Transportation

None

Annex B: WCAG 2.0 Compliance Certificate



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CDEV WCAG 2.0 CONFIRMATION

This letter is to confirm, as of Dec 1st, 2022, GeekPower has completed the website WCAG 2.0 audit on the new CDEV Website, set for publication in early 2023. We can confirm that at this time the website does meet WCAG 2.0 specifications

A handwritten signature in black ink, appearing to read 'J. Luksa', is positioned above the printed name.

Joshua Luksa
Director - GeekPower Inc.