

MILITARY POLICE COMPLAINTS COMMISSION OF CANADA

Accessible Canada Act

Multi-Year Accessibility Plan

January 1, 2023, to December 31, 2025

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MILITARY POLICE COMPLAINTS COMMISSION OF CANADA

ACCESSIBILITY PLAN

Accessible Canada Act

Background

In July 2016, the government of Canada began their consultations with more than 6,000 Canadians to determine what an accessible Canada means to them. To find more information on this consultation please reference: [Creating new federal accessibility legislation: What we learned](#). As a result of these consultations, *Bill C-81: An Act to Ensure a Barrier-Free Canada (the Accessible Canada Act)*, 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 Governmental goal, the Military Police Complaints Commission (MPCC) 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).

Summary of the Accessible Canada Act - Canada.ca

According to the [2017 Canadian Survey on Disability](#), which is surveyed every five years, one in five Canadians (6.2 million) aged 15 years and over had one or more disabilities that limited them in their daily activities. Based on the Treasury Board of Canada Secretariat workforce analysis dated March 31, 2022, the workforce availability estimate for persons with disability was 9.0%; the data indicates that the MPCC exceeded its representation whereby 20% of our employees are self-identified as persons with disabilities. MPCC does acknowledge, however, that given the size of our micro-organization, the departure of just one person with a disability could significantly skew the MPCC data.

Government of Canada's Accessibility Strategy

The [Government of Canada's Accessibility Strategy](#) has a vision of 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:

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

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

- **prepare and publish accessibility plans:**
 - make 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
- **set up a feedback process:**
 - have a way to receive and deal with feedback about their accessibility
- **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

These requirements help ensure that accessibility is a priority and that all departments are continuously improving and implementing inclusive design and accessibility by default. The responsibility for accessibility will no longer be placed on persons with a disability but rather the federal government will establish proactive mechanisms to address accessibility systemically, from the start.

General

The Military Police Complaints Commission of Canada (MPCC) is a civilian, quasi-judicial oversight agency that operates at arm's length from the Government of Canada. The MPCC derives its mandate from Part IV of Canada's *National Defence Act* (NDA). While it reports to Parliament through the Minister of National Defence, the MPCC is both administratively and legally independent from the Department of National Defence and the Canadian Armed Forces. The MPCC is formally part of the Core Public Administration under the Institution Schedule I.1 and of the HR Schedule IV of the *Financial Administration Act* (FAA).

As with other Government of Canada departments, the MPCC must comply with the Federal Government Acts and Regulations. All Treasury Board of Canada Secretariat (TBS) policies and guidance apply to the MPCC, as it is part of the organizations that make up the core public administration, as defined in section 11 of the Financial Administration Act. The MPCC Chairperson who is a Governor in Council Appointee and designated as the deputy head must monitor and ensure compliance with TBS Policies and provide reports to TBS as the Public Service Employer.

Feedback Mechanism

The *Accessible Canada Act* requires organizations to establish a departmental process for receiving and dealing with feedback regarding the implementation of the accessibility plan. MPCC will be regularly monitoring and evaluating feedback and ensuring that it is incorporated into its future plans when possible. Please reference the [Annex A: Feedback process at the Military Police Complaints Commission of Canada](#) for more information on our feedback process.

If you have any questions, feedback or suggestions, you can communicate with us by mail at:

Military Police Complaints Commission of Canada
Attention: Senior Director, Corporate Services
270 Albert Street, 10th Floor
Ottawa, ON, K1P 5G8

Telephone: 613-947-5625 (local) or 1-800-632-0566 (toll free)

Email: reception@mpcc-cppm.gc.ca

You can also choose to communicate with us anonymously by mail, by telephone or use our online Accessibility feedback form. If submitting your feedback anonymously, do not state your name or provide any other identifying information (for example, your email address or phone number). Please do not include your return address on the envelope if you send feedback by mail.

Alternate formats of this accessibility plan are available upon request. Please contact the Military Police Complaints Commission of Canada (MPCC) for information and support.

Executive Summary:

The MPCC's accessibility plan was developed by a third-party consultation firm with the input from the MPCC's subject matter experts, external stakeholders, and people with disabilities. This section summarizes the results from our external survey that was conducted in October 2022. It is important to note that despite the fact that the survey was widely distributed, it did not generate much feedback, as very few individuals participated.

Based on the priority areas identified in the *Accessible Canada Act*, the MPCC has determined several actions listed below to work towards the elimination and prevention of the identified barriers. These actions will have a direct impact on increasing a culture of inclusiveness that calls attention to accessibility at the MPCC. Additionally, the MPCC will be measuring and reporting on progress with respect to the implementation of these actions. The MPCC identified the following actions:

- While the MPCC employees are aware of their rights to accommodation during the recruitment and hiring process, continued efforts should be made to increase their awareness on accessibility.
- Ensure all documents posted on the website are accessible.
- Provide alternative formats and communication supports upon request by a user or employee.
- Consider accessibility in the development of policies and procedures.

Further, where operationally feasible, the MPCC will continue to promote telework and flexible work arrangements to accommodate the needs of all employees (Telework agreements are signed on a yearly basis).

Accessibility Statement:

The Military Police Complaints Commission strives to be an organization that exhibits fairness and impartiality, inspires trust, and contributes to a climate of confidence in military policing. The MPCC strives to be barrier-free, accessible and inclusive to all and is committed to providing accessible and inclusive services for all employees, clients, complainants, subjects and other stakeholders. MPCC will review and develop its programs, policies, directives and services with the intent to continually improve.

Multi-Year Accessibility Plan

A. Priority areas identified by the Act

1. Employment

The MPCC is dedicated to implementing government-wide initiatives and increasing representation of persons with disabilities across all occupational groups and levels. As such, the MPCC is committed to removing and preventing barriers to recruitment, retention, and the promotion of persons with disabilities. Staffing within the MPCC is done in accordance with the Public Service Employment Act, supporting Regulations and/or any additional policy, directive or guidance generally provided to departments by the Public Service Commission. The MPCC's Human Resources recruitment functions follow the structured Public Service Commissions' tools and processes for advertising vacancies that require all departments to actively offer accommodation throughout the assessment phases, up to and including the letter of offer. Once hired, employees who subsequently identify a need for accommodations can submit a request to their manager who in turn will reach out to the various members of the corporate services team for action. Emergency protocols for floor evacuations at the MPCC include consideration for employees with disabilities.

Barriers:

1. Continued efforts should be made to increase MPCC employee's awareness on accessibility upon appointment and thereafter, so they are aware of their rights to accommodation.

Actions

1. Review and determine general training/information sessions, tools, or communication strategy to increase employees' and managers' awareness and knowledge on accessibility.
2. Adopt the GC Workplace Accessibility Passport which is a tool for public service employees and applicants to document and support measures and tools they need to succeed in the workplace.
3. Review and determine targeted training to employees who are tasked to draft / publish public documents to ensure that these meet the accessibility standards for communication.

Additional goals:

- While MPCC currently exceeds the Government of Canada target employment rate for people with disabilities, it will strive to support the government-wide initiative to increase representation across the Public Service.

2. Built Environment

The MPCC continues to pursue an accessible built environment. As such, the MPCC will continue to work with employees, building owners, and Public Services and Procurement Canada to achieve the highest level of accessibility within the current office space. The office of the MPCC is located in downtown Ottawa in a building owned by a private company, where the government space is leased by Public Services and Procurement Canada. The MPCC is one of many tenants that share some of the common areas, such as the entrance to the building, lobby area, elevators, washroom facilities and parking. The building includes a wheelchair ramp and power door operators at the entrance. Power operated doors are also available at the MPCC office entrances and at the washroom entrances. Washrooms include an accessible stall. MPCC workstations are equipped with power sit/stand desks and ergonomic office chairs allowing an accessible desk set-up to respond to employee accommodations.

Barriers:

There are no identified barriers at this time which are under MPCC's responsibility.

Actions:

1. An external subject matter expert will be engaged to provide recommendations to continuously improve office accessibility.
2. We will use the inclusive design checklist for accessibility considerations (including design, safety, ergonomics, and signage).

3. Information and Communication Technologies (ICT)

The MPCC webpage is a sub-page of the Government of Canada website. The pages are templated and follow a specified structure. MPCC employees can add content to the webpage and the main mechanism to file MPCC complaints is on the webpage.

Barriers

1. Content added to the webpage must be accessible and there is a shortage of internal expertise in creating accessible documents.

Actions:

1. Ensure all content posted to the webpage is compliant to Web Content Accessibility Guidelines (WCAG) requirements.
2. Review systems, software, and equipment to ensure that they are accessible. Where they are not accessible, the MPCC will develop a plan to remediate the accessibility shortfalls.
3. Ensure that accessibility considerations are included in the MPCC ICT plan.

4. Communications other than ICT

MPCC is dedicated to ensuring that all its communications, whether internal or external, are accessible. This includes ensuring that MPCC communications are written in plain and accessible language.

Barriers:

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

Actions:

1. Develop an internal process and information on providing alternative formats and communication supports.
2. Identify and adopt standards for public-facing communications to be in plain language.
3. Evaluate current public-facing documents for clarity and plain language and provide plain language versions where necessary.

Additional Goals:

- Will promote accessible and inclusive internal and external communications practices in compliance with the latest Web Content Accessibility Guidelines (WCAG).
- Will review the MPCC website to ensure that it meets Web Content Accessibility Guidelines (WCAG) 2.1 (2018) (including: no red/green colours, which are difficult for those with colour blindness; increase contrast between colours in bar graphs; avoiding split/merged cells in tables). [Web Content Accessibility Guidelines \(WCAG\) 2.1 \(w3.org\)](https://www.w3.org/WAI/WCAG21/)

5. The Procurement of Goods, Services and Facilities

Public Services and Procurement Canada (PSPC) is a key partner in achieving accessibility at the MPCC. As such, the MPCC will implement procurement principles, rules, and practices with the goal of advancing accessibility objectives.

Barriers:

1. External consultants (investigators and others) may not have accessibility-related training prior to being contracted and interacting with MPCC employees and clients.

Actions:

1. Provide accessibility training as needed to contractors and investigators.

6. The design and delivery of programs and services

As an organization that offers services to members of the public, the Military Police, the Canadian Armed Forces and our stakeholders, the MPCC must consider accessibility in the delivery of our programs and services. A fundamental aspect in achieving this will be the feedback received from our clients and implementing meaningful accessibility improvements.

Barriers:

No barriers were identified at this time.

Actions:

1. Establish processes to provide complainants, subjects, and other stakeholders with alternate formats of their Final Reports which includes the MPCC Findings and Recommendations when requested.
2. Conduct additional external survey with our clients to assess the current state of accessibility with respect to the delivery of our programs and services.
3. When applicable, consult with people with disabilities prior to new policies and procedures to be implemented.
4. Adopt standards for public-facing communications to be in plain language.

7. Transportation

This priority area under the Act is not applicable to the MPCC.

MPCC's accessibility action plan at a glance

Action	Timeline (Calendar year)
Employment	
Review and determine general training/information sessions, tools, or communication strategy to increase employees' and managers' awareness and knowledge on accessibility.	2023
Adopt the GC Workplace Accessibility Passport which is a tool for public service employees and applicants to document and support measures and tools they need to succeed in the workplace.	2023
Review and determine targeted training to employees who are tasked to draft / publish public documents to ensure that these meet the accessibility standards for communication.	2023-2024 (based on availability of training)
Built Environment	
An external subject matter expert will be engaged to provide recommendations to continuously improve office accessibility.	2023
We will use the inclusive design checklist for accessibility considerations (including design, safety, ergonomics, and signage).	2023
Information and Communication Technologies (ICT)	
Ensure all content posted to the webpage is compliant to Web Content Accessibility Guidelines (WCAG) requirements.	2023-2024
Review systems, software, and equipment to ensure that they are accessible. Where they are not accessible, the MPCC will develop a plan to remediate the accessibility shortfalls.	Begin in 2023 and complete by 2025
Ensure that accessibility considerations are included in the MPCC ICT plan.	Begin in 2023 and complete by 2025
Communications other than ICT	
Develop an internal process and information on providing alternative formats and communicative supports.	2024
Identify and adopt standards for public-facing communications to be in plain language.	2024
Evaluate current public-facing documents for clarity and plain language and provide plain language versions where necessary.	2024
The Procurement of Goods, Services and Facilities	
Provide accessibility training as needed to contractors and investigators as needed.	2023

The design and delivery of programs and services	
Establish processes to provide complainants, subjects, and other stakeholders with alternate formats of their Final Reports which includes the MPCC Findings and Recommendations when requested.	2024
Conduct additional external survey with our clients to assess the current state of accessibility with respect to the delivery of our programs and services.	2025
When applicable, consult with people with disabilities prior to new policies and procedures to be implemented.	When applicable
Adopt standards for public-facing communications to be in plain language.	2024

B. Consultations

One of the guiding principles of the Government-wide strategy is the statement "*Nothing without us*" which affirms that persons with disabilities are involved in the design and implementation of the MPCC plan. Persons with disabilities offer a unique and valuable perspective, and our ultimate goal is to ensure that we do not have any barriers that prevent their full participation in the workplace and the community we serve.

Methodology

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. The MPCC consulted with persons with disabilities to hear from them on the current state of accessibility at the MPCC and with employees who provide services. The consultation was conducted in three parts:

1. **Subject matter experts** at the MPCC were consulted in facilitated focus groups with their knowledge of employment practices, procurement, facilities, digital resources, communications, and the design and delivery of good and services. Questions regarding accessibility barriers, current accommodation practices, and priorities for remediation were discussed and responses have been used to inform this plan.
2. **External Stakeholders**, including military family members, law firms and other stakeholders were invited to respond to the following survey questions:
 - 1) On a scale of 1 to 5, how satisfied are you with the access to services, information, and resources at Military Police Complaints Commission?
 - 2) Have you encountered an accessibility barrier when interacting with the Military Police Complaints Commission? Yes or No

3) Have you encountered an accessibility barrier when interacting with the Military Police Complaints Commission? Comments (Max 200 words)

4) In your opinion, how can Military Police Complaints Commission improve accessibility and access to their services? (Max 200 words)

5) Do you identify as a person with a disability, or do you have first-hand experience of someone living with a disability?

Nine responses to the survey were received and included in the creation of this plan. The survey was available from October 11, 2022, to November 1, 2022.

3. *Accessible Canada Act* Review Committee

The MPCC Accessibility Plan was also reviewed by the External Consultation Firm's standing *Accessible Canada Act* Review Committee. Consultation Group members are individuals with lived experience with disabilities, and knowledge of accessibility issues. Consultation was conducted September 29th to October 11th, 2022. The five-member 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 the MPCC and an advance copy of the draft MPCC 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 approved plan.

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. Similar to the MPCC accessibility plan, progress reports must be prepared in consultation with persons with disabilities. The progress reports must also present the feedback that the MPCC received (if any) and how that feedback was taken into consideration. The MPCC'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 MPCC has taken. As specified in the regulations, organizations must publish a revised plan every three (3) years. As such, the MPCC'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.”

Quasi-judicial

“means ‘court like’. It includes the actions of non-judicial bodies, such as administrative agencies, exercising their functions and powers in a judicial manner. In deciding whether an action or proceeding is ‘quasi-judicial’, various factors may be taken into account. These include whether a proceeding’s purpose is to make a determination or finding concerning a matter, the truth of which is of public concern.”

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: Feedback process at the Military Police Complaints Commission of Canada

The feedback received will be acknowledged by the Senior Director, Corporate Services, within five (5) business days, by the means of which we received the information:

- If we received the information by mail, we will write back and send the communication by mail to the contributor of the feedback.
- If we received a telephone call, we will return the telephone call to the contributor of the feedback, to acknowledge the voicemail and we will gather the feedback in a conversation. We will ask the contributor of the feedback for an email address or a mailing address to confirm the information transmitted during the telephone conversation was understood and accurate.
- If we received an email to the Reception@mpcc-cppm.gc.ca, the email will be sent to the Senior Director, Corporate Services, as identified as the person of contact for the MPCC, and an email of acknowledgement will be sent.
- If we received feedback on our social media, we will respond on the same social media platform in a private message or if not possible, directly reply to the contributor from the message where the feedback was noted.
- If we received feedback anonymously, a receipt of acknowledgement will not be issued.

Simultaneously, as the acknowledgement to the contributor of the feedback is sent, the MPCC will review the feedback and will consider the information provided and how the MPCC can improve its accessibility from the feedback received.

Furthermore, all feedback, no matter the method conveyed, as well as the submission date, will be retained in our record data management system. The feedback received will be referenced in that year's progress report. We don't identify individuals in our reports.