



**PUBLIC PROSECUTION  
SERVICE OF CANADA**

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**2022-2025**

**National Accessibility Plan**

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## MESSAGE FROM KATHLEEN ROUSSEL, DIRECTOR OF PUBLIC PROSECUTIONS AND ATTORNEY GENERAL OF CANADA

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I am pleased to present the Public Prosecution Service of Canada's Accessibility Plan, the first of its kind. The Plan takes stock of where we are as an organization in providing an accessible workplace for all of our employees, and one that is free of stigma.

While the PPSC is trying to make progress in respect of accommodations that allow employees to give the best of themselves to our workplace, we are also trying to make two important changes. The first is to change the conversation about living with a disability to eliminate the stigma that still exists for many people living with disabilities. Secondly, we want to move towards a workplace that is inclusive by design.

This plan is not perfect, but it reflects an evolution. We will continue to evolve in order to retain and attract more employees living with disabilities, at all levels of the organization, and to continue to address discrimination that persons living with disabilities may experience. Changing the conversation means addressing stigma and educating ourselves and our employees about different abilities, rather than “dis”abilities.

In closing, I want to thank the members of our National Council of Employees for Persons Living with a Disability for their contribution to this plan – they give of their time for the greater good, as professionals with other obligations within the PPSC. I am grateful for their support in helping the PPSC's equity, diversity, inclusion and accessibility goals.

## INTRODUCTION AND LAND ACKNOWLEDGEMENT

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Last year, I had the privilege of hearing Lee Seto-Thomas at a national event. She is the Director of Workplace Well-being and Elder's Circle at Canadian Heritage. She mentioned something that touched me deeply and that really shaped my work in accessibility: "Disabilities are a gift from the creator to remind us of our humanity, they help us make meaningful changes to the world. They teach us to love, to have compassion and to be creative".

With leadership and empathy, it is possible to create a workplace where employees feel that they belong, that they can sustain work-life harmony and support one another to be, do and feel their very best, whether they are working from home or in-person at the office.

It is my pleasure to present to you this first Accessibility Plan. This plan has brought colleagues together from coast to coast to coast. I am grateful for the significant collaboration and support from members of the National Council of Employees for Persons Living with a Disability (NCE PwD). Their contributions have been key in the development of this plan. I would like to bring attention to the fact that each pillar of the plan was drafted by a member of our NCE PwD, who led the discussions with internal stakeholders. The NCE pillar leads brought their lived experiences to the table to present their pillars in their own unique ways. The NCE PwD and I still have much work to do in order to implement the many focused activities identified for the various pillars. My hope is that this Accessibility Plan marks the beginning of an everlasting culture-change in our department.

I acknowledge Canada as the land of the First Peoples (Nations), Inuit & Métis. I pay homage to the Indigenous Peoples, past, present and future who continue to work, educate and contribute to the strength of this country. I recognize land that is shared through historic treaties, developed through contemporary treaties and land that continues to be unceded territory.

I leave you with a quote from Chief Willie Littlechild: "The recognition of our history on this land is an act of reconciliation and we honour those who walk with us."

Norma Pavoni,

National Liaison EDIA and Accessibility Officer

## GENERAL - CONTACT INFORMATION

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**Title:** National Liaison EDIA and Accessibility Officer  
Accessibility and Disability Champion  
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**Toll-free telephone number:** 1-833-791-1086. Please leave a detailed message for the Accessibility Officer. Should you wish to leave your contact information, a member of the Advancement Centre for EDIA will return the call within 72 hours.

**This document is available in alternate formats upon request.**

Such formats include, but are not limited to: print, large print, Braille, audio format or an electronic format that is compatible with adaptive technology that is intended to assist persons living with a disability.

**Follow the PPSC:**

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## ACCESSIBILITY STATEMENT

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The Public Prosecution Service of Canada (PPSC) is a key participant in the Canadian criminal justice system. An important aspect of its mission is to contribute to making Canada a safe and just society. Every employee plays a unique role in the PPSC's mission. This places them in a very important and privileged position of trust. It requires high standards of ethical behaviour and an emphasis on a collective responsibility in developing and maintaining an organizational culture where all employees are treated equitably with respect, dignity, and fairness. When employees are able to bring their whole selves to work, feel valued, and offer their best potential, they will be able to contribute in a concrete and meaningful way towards a criminal justice system that is more equitable and fair to all Canadians.

The PPSC is committed to an organizational culture change anchored in the principles of equity, diversity, inclusion, and accessibility. We commit to working together to ensure its sustainability.

The implementation of this Accessibility Plan is an ongoing engagement that will require continuous dedication, action, and decision making on the part of senior management and all employees. It will take time, resources, and perseverance. The PPSC will need to advance in a way that ensures everyone in the organization experiences a work culture that is more accessible, with a clear focus on removing and preventing barriers that currently exist at the PPSC. This Accessibility Plan is an evergreen document and upcoming progress reports will be published in December 2023 and December 2024. NCE sub-groups will continue to meet and engage stakeholders to ensure commitments and focused activities are meeting our unique goals. Annex D attached lists past and ongoing achievements to remove and prevent barriers within our organization.

### CONSULTATIONS WITH EMPLOYEES LIVING WITH A DISABILITY

The NCE PwD, created in September 2021, was consulted and included in all aspects of this plan. The council meets on a monthly basis. It has been, and will continue to be, at the center of all conversations. A list of its seventeen (17) members and their disabilities is provided in Annex A.

Since the month of May 2021, the National Liaison EDIA and Accessibility Officer has held a total of twenty-nine (29) discussions with employees living with a disability who required assistance with workplace adjustments and accommodation. Elements from these confidential discussions were factored into this plan.

In consultation with the NCE PwD, the National Liaison EDIA and Accessibility Officer prepared a national survey to help identify barriers (see Annex B). This confidential digital survey was sent by the Director of Public Prosecutions on May 18, 2022. It remained open and available to all employees for a period of three (3) weeks. Thirty-three percent (33%) of employees took part in the survey, which was promoted extensively by the NCE PwD during National AccessAbility Week (NAAW) 2022. The survey contained separate questions for PwD, supervisors/managers and allies. The National Liaison EDIA began drafting the plan once survey results were compiled and made available to the NCE PwD, in the summer of 2022.

The NCE PwD used the software Survey Monkey to ensure confidentiality and supplied employees a Word accessible format, as per Accessibility, Accommodation and Adaptive Computer Technology's (AAACT) recommendation. The company Just Accessibility prepared the Word document. Because of the current culture of the organization, the NCE PwD felt that it would gather the most candid responses from employees if they were given the opportunity to answer questions anonymously.

The NCE PwD also reviewed the results of the May 2021 Public Service Employee Survey (PSES) and took that data into consideration.

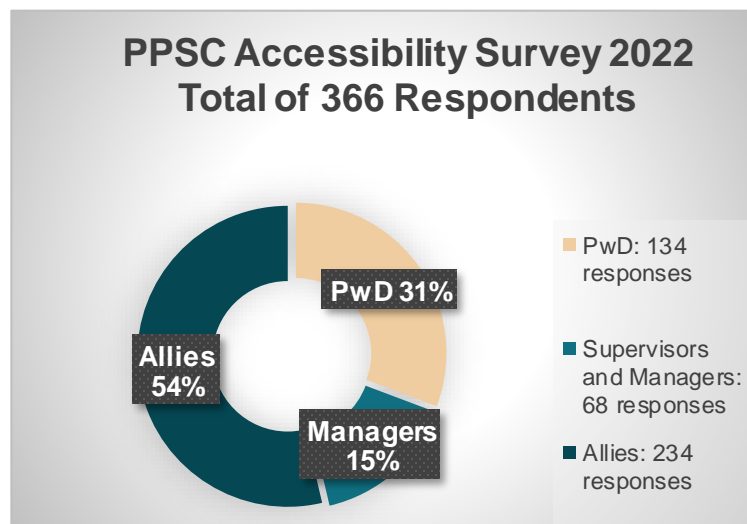


Figure 1 - PPSC Accessibility Survey 2022 had a total of 366 respondents. 134 PwD. 68 supervisors and managers, with some also identifying as a PwD. 234 allies, with some also identifying as a supervisor and/or a PwD.

## Public Prosecution Service of Canada – Accessibility Plan 2022

### *Creating a culture of belonging for employees living with a disability*

A member of the NCE PwD led each pillar of this Accessibility Plan. They worked closely with a sub-group of the NCE PwD, and consulted with primary stakeholders and managers at the PPSC. The pillar leads were supported by:

- National Liaison EDIA and Accessibility Officer, Norma Pavoni;
- NCE PwD co-chair, Jason Mitschele, a blind prosecutor and interim team leader from the Ontario Regional Office.

Sub-groups held regular meetings during the summer and fall of 2022 to discuss survey results, barriers identified, and possible actions to help remove these barriers.

A draft version of this plan was distributed for consultation on November 1, 2022. It was shared with the Senior Designated Official responsible for EEDI (SDOEEDI), members of the Advancement Centre for EDIA (ACEDIA), the GBA Plus Responsibility Centre, the Communications Division, the NCE PwD, and co-chairs of the Supervisors' Network. An additional eleven (11) employees living with a disability self-disclosed in the national accessibility survey and mentioned that they wanted to contribute to the development of the Accessibility Plan. A confidential email was sent to these eleven (11) employees on August 30, 2022, giving them the opportunity to contribute to the plan either by joining a sub-group or by meeting confidentially with the National Liaison EDIA and Accessibility Officer.

Input received from the consultations included diverse experiences and perspectives. Comments were helpful, detailed, constructive, and actionable.

In building this plan, the NCE also considered the Self-Assessment Tool (SAT) provided by the Treasury Board Secretariat. This very thorough, self-paced questionnaire, which was made available to departmental accessibility leads, helped the NCE propel consultations, informally assess accessibility as well as learn about best practices currently in place across the federal public service.

The PPSC plans on sending out a second, shorter version of its accessibility survey during NAAW 2023, in preparation of the December 31, 2023 Progress Report.

## INCLUSIVE LANGUAGE

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While the NCE has considered the current rules surrounding inclusive writing, it wants to acknowledge at the outset that this plan may not be perfect. The PPSC is a member of the Interdepartmental Terminology Committee on Equity, Diversity and Inclusion (EDI), who co-developed and published a terminology guide on EDI terms and concepts. [The Guidelines for Inclusive Writing](#) are designed to help organizations produce writing that is free of discrimination. The Guidelines were developed to provide a variety of possible solutions to issues one might encounter when drafting an inclusive text.



### PLAIN LANGUAGE

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While the NCE has considered some of the current rules surrounding plain language, it wants to acknowledge at the outset that this plan may not be perfect. Although the PPSC is not yet an expert in the field of plain language, it actively tries to integrate it into its communications. The NCE has reviewed this plan with plain language in mind and tried to make it clear, concise, and to-the-point. Should you have any feedback to provide, please email us at [PPSCAccessibilityFeedback@ppsc-sppc.gc.ca](mailto:PPSCAccessibilityFeedback@ppsc-sppc.gc.ca).

### GENDER-BASED ANALYSIS PLUS (GBA PLUS)

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GBA Plus has been a consideration since the launch of the national accessibility survey in May of 2022. When developing the solutions based on the barriers shared by employees, the NCE considered a full range of possible intersectional factors. These factors went above and beyond those that were represented by employees living with a disability who helped draft this plan. GBA Plus analysis is a continuous process, and the NCE will continue to leverage it as a tool to monitor for possible barriers and help develop practical solutions in an effort to meet the needs of employees. Bias awareness is an important element of any GBA Plus process. The National Liaison EDIA made sure to recognize biases as they came up in discussions with stakeholders and addressed them with the assistance of the NCE PwD. This is an ongoing commitment of the NCE: to explore, uncover, challenge, and reduce biases in the department.

### BACKGROUND AND GENERAL INFORMATION

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The PPSC is a national, independent, and accountable prosecuting authority. Its main objective is to prosecute federal offences in a manner that is fair and free from any improper influence. It also provides legal advice and assistance to law enforcement. It was created in 2006. Its mandate is set out in the Director of Public Prosecutions Act. The Act empowers the Director of Public Prosecutions (DPP) to:

- initiate and conduct federal prosecutions;
- intervene in proceedings that raise a question of public interest that may affect the conduct of prosecutions or related investigations;
- issue guidelines to federal prosecutors;
- advise law enforcement agencies or investigative bodies on general matters relating to prosecutions and on particular investigations that may lead to prosecutions;
- exercise the authority of the Attorney General of Canada in respect of private prosecutions; and

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- exercise any other power or carry out any other duty or function assigned by the Attorney General of Canada that is compatible with the Office of the DPP.

In 2020, an initiative was launched to review our mission statement and corporate values. After a thorough analysis and a consultation process, it was determined that the current set did not reflect the PPSC as an organization, and did not support the future direction of the organization. The new set of values is more practical and acts as a guide to employees in their daily actions, behaviours, and decisions.

#### **Mission Statement**

The PPSC's mission is to serve the public interest and help make Canada a safe and just society by:

- Conducting prosecutions in a manner that is equitable, objective, and independent, while protecting the rights of every individual; and
- Contributing to the change necessary to support a criminal justice system that is fair to all.

#### **The New Values are:**

- Respect;
- Trust;
- Professionalism;
- Courage;
- Equity and inclusion; and,
- A commitment to truth and reconciliation with Indigenous peoples.

Each value is now accompanied by a concrete description of what this value means in practice.

The new values and their descriptions are the product of extensive consultations across the PPSC. These consultations were designed to be as inclusive as possible. They included employees and managers from all regions, backgrounds, and occupational groups. In addition, the consultations paid particular attention to the feedback of four (4) NCEs, namely the national councils for Indigenous employees, Black employees, PwD, and 2SLGBTQIA+ employees. Their feedback was instrumental in determining which values were ultimately included, and how they were described.

As of March 31, 2022, the PPSC has 1,197 employees. They perform their duties within eleven (11) regional offices and headquarters.

The PPSC employs a diverse workforce: students, clerks, financial and acquisitions officers, IT specialists, communications advisors, HR specialists, administrative assistants, legal assistants, prosecutors, paralegals, team leaders, managers and executives. They are classified under the following groups: AS, CR, CS, CT-FIN, EC, EX, IS, LC, LP, LS, PE, PG, and PM.

In January of 2021, the Director of Public Prosecutions, Kathleen Roussel, named a Senior Designated Official responsible for Employment Equity, Diversity and Inclusion (SDOEEDI).

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### *Creating a culture of belonging for employees living with a disability*

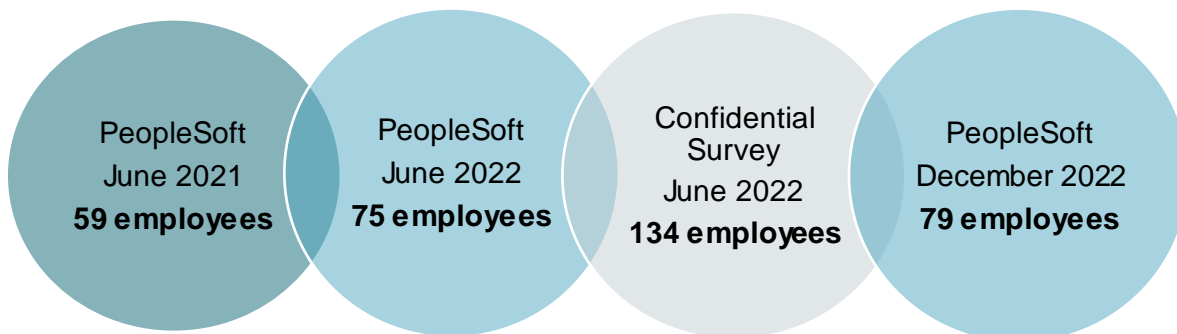
In May of 2021, the SDOEEDI named a National Liaison EDIA and Accessibility Officer. This person acts as the Departmental Accessibility and Disability Champion and co-leads the NCE PwD. The Accessibility Officer also represents the organization in various communities of practice :

- Adopters' Meeting for the GC Workplace Accessibility Passport;
- Interdepartmental Accessibility Community of Practice; and,
- Disability Inclusion and Workplace Accommodation Community of Practice.

The ACEDIA was created in December of 2021 and is led by the SDOEEDI. This Centre is influencing and accelerating the growth and development of a diverse workplace and an equitable and inclusive culture. It also seeks to nurture and provoke change to help remove or mitigate systemic barriers at all levels, while taking a people-centered approach. It tries to acknowledge harm and works restoratively to promote a sense of pride and belonging in every employee. The Centre is also trying to influence the hearts and conscience of employees in order to have a meaningful impact on the organization's collective journey towards becoming a safer, more equitable workplace, free of discrimination, and harassment. The Centre co-developed and launched an ambitious EDIA Action Plan in 2022. It is one of the Centre's early accomplishments.

The NCE is hopeful that this first Accessibility Plan will create a culture of belonging for all employees working at the PPSC. Some employees have been hiding their disability in order to fit in and feel accepted. As well, the retention of employees living with a disability has sometimes been a challenge. This needs to change. In 2021-2022, the NCE worked on shifting the culture and creating a safe and brave environment for PwD. Although there has been some progress, there is still much to do.

### SELF-IDENTIFICATION AT THE PPSC



Results from the first national accessibility survey are clear: employees living with a disability are reluctant to self-identify and/or to speak about their disability, as they fear that the stigma and the judgment will prevent them from advancing in their careers. Some also fear that they will face discrimination or be let go once their contract comes to term, while others have reported not wanting to put an additional burden on their supervisors.

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### *Creating a culture of belonging for employees living with a disability*

The PPSC must create an environment that recognizes disability, provides the necessary support quickly and efficiently, and challenges shaming and stigma. All employees need to feel that they belong and they should expect to be treated with dignity and respect.

The PPSC plans on building and sustaining a culture of belonging by focusing on the following priorities:

- ✓ Retention and career development of employees living with a disability, ensuring that they have the tools and resources that they require in order to succeed in their jobs. This includes providing them with opportunities to have meaningful careers at the PPSC and the federal public service.
- ✓ Implementation of a new Workplace Accessibility Centre that will become a centre of expertise for all matters related to accessibility and workplace adjustments for employees living with a disability. This new Centre will act as the central point of contact with all key players and experts to resolve requests quickly and efficiently.
- ✓ Training and communication: educate staff on the disabilities that are most prevalent at the PPSC, help supervisors and managers navigate accessibility requests, and create an everlasting culture of inclusion and belonging.

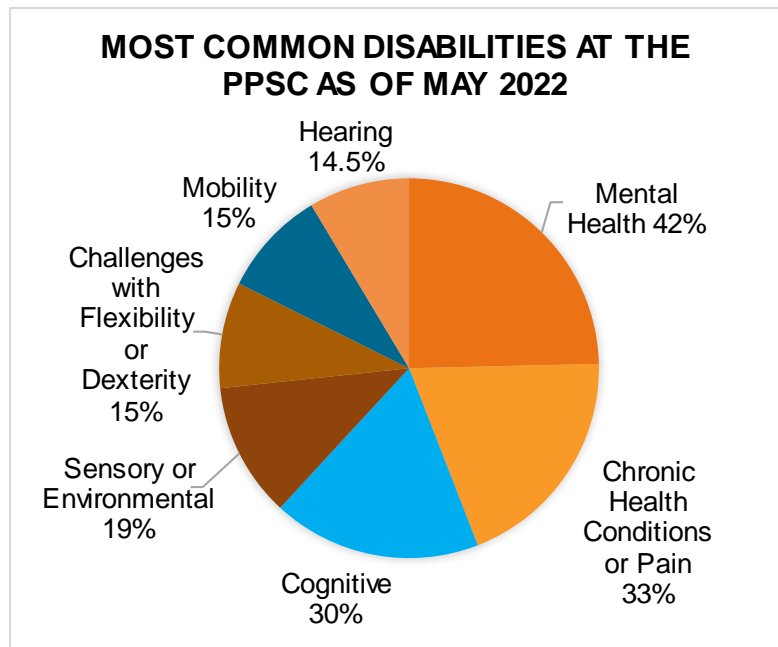


Figure 2 - Most common disabilities at the PPSC as of May 2022: 42% mental health, 33% chronic health conditions or pain, 30% cognitive, 19% sensory or environmental, 15% challenges with flexibility or dexterity, 15% mobility, 14.5% hearing

### PILLAR 1 - EMPLOYMENT

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#### **Quote from the pillar lead, Paula Flood, who self identifies as having Attention Deficit**

**Hyperactivity Disorder (ADHD):** *“Each of us has strengths, and a great desire to put them to use at work. We want to know that we are adding value, and contributing the best way we can. When we can do that, everyone benefits, including our organization. But jobs, like our built environments, have been created for able people. Those of us with disabilities often struggle to get access to the jobs that we want, and know we can do, because of the various barriers in the assessment processes, or biases about what people with disabilities can do. Then, if and when we get the jobs, we have to deal with the barriers on the job. Stigma, lack of understanding about needs, lack of accommodation and/or technology, these preclude us from doing our best work. But when we break down these barriers? All employees benefit, and the workplace is enriched!”*

### Consultations

In September of 2021, the PPSC created its very first employee council, the NCE PwD. This employee-led council has since been at the center of the conversations on how to make the PPSC more accessible. This committee currently counts seventeen (17) members.

In May of 2022, the PPSC launched an online survey aimed at gathering specific data on the barriers experienced by employees living with a disability across all regions. Three hundred and sixty-six (366) employees took the survey, one hundred and thirty-four (134) of whom indicated that they live with a disability.

Annex C contains a detailed account of the questions asked as well as the data compiled from the survey. Below are the questions that we asked in our national accessibility survey for the employment pillar:

- Are you aware of the existence of the GC Workplace Accessibility Passport for Persons living with a disability? (Question for all employees)
- Have you experienced barriers during a staffing process at the PPSC? Check all that apply. (Question for PwD only)
- Have you experienced barriers during your onboarding at the PPSC? (Question for PwD only)
- Have you experienced barriers to promotion and/or career progression within the PPSC? (Question for PwD only)
- In the past 2 years, have you asked for any type of accommodation/adjustment? (Question for PwD only)

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## Creating a culture of belonging for employees living with a disability

- If you requested an accommodation/adjustment in the past 2 years, was your request accepted, denied or is it still ongoing? (Question for PwD only)
- If you requested an accommodation/adjustment in the past 2 years, what is your overall satisfaction with how it was handled? (Question for PwD only)
- Who do you think is your first point of contact for accommodation/adjustment requests at the PPSC? (Question for all employees)
- Who do you contact when you experience delays or when an accommodation/adjustment request is denied? (Question for all employees)
- Can you tell us what is working well at the PPSC in terms of accessibility and accommodation? (Question for all employees)
- Can you tell us what has room for improvement at the PPSC in terms of accessibility and accommodation? (Question for all employees)
- How can the PPSC improve the way that it deals with accessibility and accommodation requests for employees living with a disability? (Question for all employees)

## Findings for Employment

### Barriers Identified for Employment

### Focused Activities to Remove and Prevent Barriers for Employment

#### Recruitment

Assumptions, biases, ableism, and preconceived ideas from hiring managers/panels with a limited understanding of disabilities and possible accommodation.

Belief that a worker with a disability does not pull their own weight, cannot do the job 100%, or might not have the same capacity as other workers.

Belief that accommodation for PwD will be difficult and/or expensive.

Assessment methods can be barriers to PwD.

- Training, support, objectives, and accountability for hiring managers. Work collaboratively with the Supervisors' Network to include training in their yearly calendars and in Learning Roadmaps.
- Training, including Canada School of Public Service (CSPS) course COR120, on accessibility and the GC Accessibility Passport to be mandatory for hiring managers and hiring panel members.
- Ensure that the Public Service Commission Guide on Biases and Barriers in Assessments, the Guide for Assessing Persons with Disabilities, and other resources on fair assessments, are used and followed in every staffing process.
- Train staffing advisors on disabilities and related accessibility requirements.
- Simplify our approaches: review the PPSC's internal processes in order to make application instructions and screening questions, straightforward and as simple as possible.
- Integrate universal design principles into assessment processes wherever possible.
- Include review of accommodation in informal discussions when candidates with a disability have been screened out. Consider routine review, with internal candidates, of effectiveness of accommodation measures in the

# Public Prosecution Service of Canada – Accessibility Plan 2022

## Creating a culture of belonging for employees living with a disability

Barriers Identified for Employment	Focused Activities to Remove and Prevent Barriers for Employment
	<p>assessment process, and make adjustments and improvements as necessary.</p>
<p>Pw D may self-screen if they feel like they cannot compete.</p>	<ul style="list-style-type: none"><li>• Have staffing processes articulate a clear welcome to Pw D, as well as information on accommodation requests.</li><li>• Ensure annual regional HR Staffing plans have clear objectives for hiring and retaining Pw D.</li><li>• Plan for targeted recruitment and outreach activities; collaborate with community organizations such as LiveWorkPlay to recruit talented employees.</li></ul>
<p>Merit criteria that exclude certain Pw D.</p>	<ul style="list-style-type: none"><li>• Review work descriptions and ensure that only key criteria are included in the merit criteria, both in advertised and non-advertised processes.</li><li>• Ensure that training is provided to HR Staffing Advisors and managers on determining bona fide merit criteria.</li><li>• Ensure all merit criteria are written in clear, plain, and concise language.</li><li>• Consider including the NCE Pw D in the review of language and criteria of posters prepared for staffing processes targeted to Pw D.</li></ul>
<p>Some non-advertised staffing processes may limit opportunities for Pw D.</p>	<ul style="list-style-type: none"><li>• Review internal processes, policies, and practices leading to internal non-advertised promotions with the Supervisors' Network to ensure that Pw D will be given consideration for opportunities.</li><li>• Encourage managers to share general information about the nature of their process decisions at the planning stage, perhaps at the beginning of each fiscal year.</li><li>• Encourage the informal early resolution of staffing and/or discrimination complaints (via informal discussion or neutral ombuds).</li></ul>
<b>Development and Promotion</b>	
<p>Lack of consistent onboarding practices results in some Pw Ds not receiving the required support and guidance to fully understand their roles and responsibilities.</p>	<ul style="list-style-type: none"><li>• Develop, implement, and monitor uniform onboarding practices across regions to support Pw D.</li><li>• Ensure onboarding training material are available in alternate formats, and that documentation is simplified and accessible.</li><li>• Include accessibility support information in onboarding process, including training, tools, the GC Accessibility Passport, and other resources. Provide information on PPSC's NCE Pw D.</li><li>• Revise letter of offer to include information about the GC Passport and the role of the Accessibility Officer.</li></ul>
<p>Not enough developmental opportunities offered to Pw Ds, thus preventing them from qualifying for promotions.</p>	<ul style="list-style-type: none"><li>• Ensure that Pw D have equal access to acting opportunities, either through rotation or through advertised staffing processes. Connect with the Supervisors' Network to provide information on this topic.</li><li>• Consider implementing a Mentorship Plus (sponsorship) to ensure Pw Ds are given fair consideration for developmental opportunities.</li><li>• Develop inclusive and accessible Talent Management and Succession Planning programs in consultation with the NCE Pw D, and apply consistently across the PPSC.</li></ul>



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## *Creating a culture of belonging for employees living with a disability*

Barriers Identified for Employment	Focused Activities to Remove and Prevent Barriers for Employment
	<ul style="list-style-type: none"> <li>Plan for the participation of PwD at the EX-01 level in the Mosaic Leadership Development Program.</li> </ul>
<p>Lack of information about opportunities and mechanisms of staffing and talent management.</p>	<ul style="list-style-type: none"> <li>Consider coaching for PwD in order to assist them in succeeding in staffing processes.</li> <li>Ensure transparency of talent management and succession planning programs – provide information sessions to all employees.</li> </ul>
<p>Bias in performance management may lead to fewer promotions for PwD.</p>	<ul style="list-style-type: none"> <li>Analyze the link between performance reviews and promotional rate for PwD.</li> <li>Encourage the use of the GC Accessibility Passport when setting performance objectives.</li> <li>Ensure that LR Advisors are trained in accessibility issues and are able to provide relevant advice to managers for performance issues that may be related to disability.</li> </ul>
<b>Culture and Retention</b>	
<p>Fear of retaliation. Complaints from PwD may be career limiting.</p>	<ul style="list-style-type: none"> <li>Increase training for staffing and LR representatives to ensure fairness in complaint processes.</li> <li>Ensure sufficient communication for awareness concerning support available from neutral ombuds (HWS) in the event of complaints and/or retaliation.</li> </ul>
<p>The stigma associated with having a disability is so negative that employees refuse to self-identify or seek accommodation.</p>	<ul style="list-style-type: none"> <li>Mandatory training for managers on increased awareness, understanding of disability/ability, and their responsibility to create a psychologically safe environment.</li> <li>NCE PwD to continue its information campaign in support of PwD, aligning the messages to the programs offered in support of PwD.</li> <li>Develop and implement a comprehensive plan to encourage the self-identification of employees living with a disability to reduce stigma.</li> <li>Prepare event to socialize the new tool for self-ID that will be launched by TBS.</li> <li>Develop and implement a plan to increase the number of PwD in leadership roles.</li> </ul>
<p>Harassment and discrimination: in the most recent PSES results, twenty-three percent (23%) of PwD respondents have reported harassment compared to fourteen percent (14%) for other employees. Twenty-one percent (21%) of PwD have reported discrimination compared to eight (8%) for other employees.</p>	<ul style="list-style-type: none"> <li>Offer training to improve accessibility, disability awareness and/or disability confidence of employees, managers, and functional communities such as HR professionals.</li> <li>Ensure supervisors and managers recognize and appreciate the contributions of NCE PwD members as well as Regional EDI Committee members in their performance planning and review processes.</li> <li>Raise awareness about accessibility and disability inclusion by continuing to organize national events for International Day of Persons with a Disability and NAAW.</li> <li>Commemorate days and communicate information, engage in conversations on special national or international awareness days, for example, National Disability Employment Awareness Month, and World Autism Month.</li> </ul>



# Public Prosecution Service of Canada – Accessibility Plan 2022

## Creating a culture of belonging for employees living with a disability

### Barriers Identified for Employment

### Focused Activities to Remove and Prevent Barriers for Employment

- NCE PwD to plan and conduct communication campaigns throughout the year to raise awareness on accessibility resources available to all employees.
- Participate in the new Interdepartmental HR advisory committee on PwD. This Committee will be discussing and sharing best practices in retention, recruitment and promotion, and the Advisor will ensure that HR practitioners are informed and practices are integrated in our processes.

### Accessibility, Accommodation, and Individualized Adjustments

PwD do not know who to contact when they experience an accessibility issue.

- Ensure that all employees and all managers have the required information, including email address, iNet page, tools and guidance related to Accessibility, such as:
  - New generic email address
  - New 1-800 number
  - New feedback process on iNet for monitoring user experience with accessibility issues

PwD complain of long wait times and burdensome accommodation process.

PwD have a level of fear and discomfort in raising concerns about barriers. The Duty to Accommodate file is currently being managed by the Labour Relations team whose focus is sometimes perceived as supporting managers more than employees.

There is a sense of an attitude in the department that an accommodation is a "special favour" that can be granted, withheld or cancelled at any time.

- The new Workplace Accessibility Centre will manage accessibility and individualized workplace adjustments for PwD. It will streamline and improve the accommodation experience for all parties involved. An internal multi-disciplinary committee will also be set up and will include LR, IT, OHS, Procurement and Facilities.
- The approach to accommodating people with disabilities at the Workplace Accessibility Centre will be one of "yes, by default", and will promote a culture of creating the right conditions for employees to thrive in the workplace.

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### PILLAR 1 Stakeholders

NCE Pw D sub-group leader:

Paula Flood

Sub-group members:

Adam Halliday

Jacques Hardy

John Hartman

Tim McLaughlin

Penny-Laine Narlock

Sub-group supported by:

Jason Mitschele and Norma Pavoni, co-chairs of the NCE Pw D

Internal stakeholders consulted:

Dominic Bouchard – Interim Director, Workforce Services and Solutions (September 19th - November 4th, 2022) Classification and Organizational Design

Cynthia Lascelle – Interim Director, Workforce Services and Solutions (November 7th - December 31st, 2022) Performance/Talent Management, Official Languages, Character Leadership, HR Planning and HR Data Analytics

Mireille Lamontagne – Manager, Staffing and Executive Services

Natalie Crouch, Team Leader, HR Administrative Services

Bojana Zizic – Director, Workplace Wellbeing, Development

Cristian Contreras – Manager, Labour Relations

Luc St-Martin - Manager, HR Programs and Development

Stéphanie Viau – Manager, Occupational Health and Safety

## PILLAR 2 – THE BUILT ENVIRONMENT

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**Quote from the pillar lead, Heather Russell, who self identifies as having a congenital limb difference:** *“Virtually all built environments, our workplaces included, are designed to be accessible for people who have the stamina to stand and walk sturdily, are not large or small in stature, have fine motor skills, clear vision, strong hearing, the ability to focus in loud crowded spaces under harsh lights and bright colours, and a placid immune system. That is an onerous criteria list, and it creates barriers for a lot of people. It’s time for change. Our workplaces need to be accessible and inclusive for everyone.”*

### Consultations

In September of 2021, the PPSC created its very first employee council, the NCE PwD. This employee-led council has since been at the center of the conversations on how to make the PPSC more accessible. This committee currently counts seventeen (17) members.

In May of 2022, the PPSC launched an online survey aimed at gathering specific data on the barriers experienced by employees living with a disability across all regions. Three hundred and sixty-six (366) employees took the survey, one hundred and thirty-four (134) of whom indicated that they live with a disability.

Annex C contains a detailed account of the questions asked as well as the data compiled from the survey. The following questions were asked for the Built Environment pillar:

- How would you rate the accessibility of your current office building based on your own needs? (Question for PwD only)
- How would you rate the accessibility of your current office building in general? (Question for all employees)
- Who do you contact to report a problem with the accessibility of a building at the PPSC? (Question for all employees, but results were separated in order to better understand the barriers experienced by PwD)
- Are you aware of the accessibility features and services available at the PPSC for your own needs? (Question for PwD only)
- Are you aware of the accessibility features and services available at the PPSC? (Question for all employees, but results were separated in order to better understand the barriers experienced by PwD)
- Are in-person meetings and events fully accessible to you? (Question for all employees, but results were separated in order to better understand the barriers experienced by PwD)

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- Are you aware of your building's current emergency evacuation plan? (Question for all employees, but results were separated in order to better understand the barriers experienced by PwD)
- What is your preference for onsite work post-pandemic? (Question for PwD only)

Generally, comments received about this particular pillar were as follows:

- Only twenty-five percent (25%) of employees with disabilities find their workplace completely accessible.
- Twenty-seven percent (27%) of all employees do not know who to contact to report a problem with the accessibility of a building at the PPSC.
- Thirty-three percent (33%) of PwD employees do not know who to contact to report a problem with the accessibility of a building at the PPSC.
- Fifty percent (50%) of employees with disabilities do not know about accessibility features and services available at the PPSC.
- Approximately twenty percent (20%) of employees found in person meetings and events were not accessible or only partially accessible.
- Approximately fifty percent (50%) of all employees do not know their building's evacuation plan, or they do know it but have concerns about it.
- The vast majority of employees with disabilities would prefer to work from home the majority of the time.

The Built Environment Sub-Group formed in February 2022, and held nine (9) meetings since then. The sub-group has focused on gathering information on workplace accessibility already compiled by different government agencies, meeting with AAAC, analyzing the results of our national accessibility survey, and consulting with the Facilities Management and Accommodations Services Unit (FMA) regarding the HQ Refit Project. The sub-group consulted with the NCE PwD as a whole regarding the proposed HQ Refit and identified many problematic elements with the design, based on our knowledge and lived experiences as PwD. The sub-group hopes that concerns raised by PwD will be heard and improvements will be made to the design for the HQ Refit.

As our workplaces are designed only to accommodate what we loosely define as able-bodied neurotypical people, they are not fully accessible for many employees. To properly assess how our workplaces are functioning for employees, an audit of each region is needed. The audit could be conducted internally, or it could be conducted by an outside agency. In either scenario, the participation of PwD is essential.

The scope of change needed to make our workplaces inclusive by design and accessible by default may seem daunting, but, in order for the PPSC to be a truly equitable and inclusive employer, we need to have workplaces that are accessible for every employee so they can do their job and feel like they belong.

### Findings for the Built Environment

Barriers Identified for the Built Environment	Focused Activities to Remove and Prevent Barriers for the Built Environment
<p>Some alarms may not be heard by employees with a hearing impairment.</p>	<ul style="list-style-type: none"><li>• To supplement the standard audible alarm systems, visual alarms (for instance, flashing lights) should be installed to signal an emergency to people with hearing disabilities.</li><li>• Communicate information to employees and ask that those who might benefit from this tool to email our Accessibility Officer who will ensure follow-up.</li><li>• Facilities Management and Accommodations Service Unit (FMA) will be assessing current office alarm systems and will work with the NCE to both determine priority areas requiring such refit and to develop a workplan to ensure all locations have been upgraded.</li><li>• Moving forward, all refits to include a visual alarm system in FMA's standards.</li></ul>
<p>For employees who have difficulties with the built environment, alternative work arrangements should be provided on a case-by-case basis.</p>	<ul style="list-style-type: none"><li>• For supervisors and managers, consideration in advance of how alternative work arrangements, including but not limited to telework, task modifications and other alternatives, should be integrated into daily operations. This will ensure that accommodation is provided in a more efficient manner when the need arises.</li><li>• Supervisors and managers should consult and follow our new Guide for Hybrid Work and seek support if they require assistance in providing the appropriate accommodation.</li><li>• Engage with the Supervisors' Network to make sure that information is readily available for supervisors and managers.</li></ul>
<p>Ensure colour schemes are adequate for employees with visual impairments and sensory sensitivities.</p>	<ul style="list-style-type: none"><li>• Workplace colour schemes should be selected in order to help people with visual impairments navigate throughout a workplace.</li><li>• Workplace colour schemes should not be overly stimulating or distracting for employees with cognitive disabilities.</li><li>• FMA will consult NCE while fit-up designs are being developed by external design consultant experts. NCE will determine if experts need to be consulted.</li><li>• As well, patterns on the walls and floors should be avoided in favour of uniform colours. Spatial changes like the turning of a hallway may be indicated by using contrasting colours on the walls and/or floors.</li></ul>

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<p>Counters and sinks are too high for all employees to reach.</p>	<ul style="list-style-type: none"><li>• Kitchen and washroom counters, soap dispensers, paper towels/air dryers, and electrical outlets, should be installed at a height that allows a person using a wheelchair to use them.</li><li>• Hand soaps in dispensers should be unscented to avoid adverse reactions by persons with environmental sensitivities.</li><li>• FMA to collaborate with NCE to identify and develop a work plan to remediate existing situations.</li></ul>
<p>Rounded door knobs are difficult for many employees to use. Opt for door openers and levers instead.</p>	<ul style="list-style-type: none"><li>• Openers should be conveniently located near the door they are meant to open and at a height easily reached by someone using a wheelchair.</li><li>• FMA to collaborate with the NCE to identify offices with limited door openers or that require adjustments. Prioritized work plan is to be developed in collaboration with NCE PwD.</li><li>• Security Services to be consulted to ensure employee security and safety is maintained.</li></ul>
<p>Doors should have a glass panel so employees can see who is on the other side, with the exception of witness rooms.</p>	<ul style="list-style-type: none"><li>• All doors should have a glass panel to enable people to see if there is someone on the other side.</li><li>• Where necessary, additional panels should be placed at a level appropriate for those using wheelchairs.</li><li>• Prioritized work plan is to be developed in collaboration with NCE PwD to correct offices built prior to 2010.</li></ul>
<p>Common gathering areas, such as the kitchen, should have a door or be positioned so that smells and sounds are not distracting to employees working in the vicinity.</p>	<ul style="list-style-type: none"><li>• To be considered in all new refit or redesigns. This particularly affects employees with cognitive disabilities or scent sensitivities.</li><li>• Consultation with the NCE is required to identify specific issues of concern to be addressed.</li><li>• Work arrangements to be considered by managers/supervisors on a case-by-case basis in collaboration with FMA.</li></ul>
<p>Elevators are not accessible for all employees.</p>	<ul style="list-style-type: none"><li>• Elevators should feature both visible and verbal door opening/closing and floor indicators.</li><li>• Elevators should have enough room to accommodate a motorized wheelchair or scooter. Call buttons should be located at a position on the wall where they can be reached by most people, whether they are standing or sitting.</li><li>• Consultations will be engaged between FMA and NCE PwD to discuss challenges that could result in limitations (elevator size and features, etc.)</li></ul>

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Barriers Identified for the Built Environment	Focused Activities to Remove and Prevent Barriers for the Built Environment
	<p>for new office locations, to identify gaps, develop solutions, and mitigate risk.</p> <ul style="list-style-type: none"><li>• Undertake to report any issue with maintenance or repair of elevators promptly.</li></ul>
Lack of enclosed workstations is a barrier to some employees.	<ul style="list-style-type: none"><li>• A number of workstations should be designed to be more enclosed, or designed in such a way that they can easily be more enclosed, should this be required to accommodate employees with certain disabilities.</li><li>• There should be an adequate number of enclosed workstations for all employees so that persons with disabilities are not segregated, and therefore stigmatized, by having only one area of the office they can work in.</li></ul>
Evacuation plans need to be reviewed for accessibility.	<ul style="list-style-type: none"><li>• Consult and work with regional offices to ensure that there is an adequate number of employees in the workplace at all times to help employees who need assistance during an evacuation.</li><li>• NCE to host a self-identification campaign to encourage employees living with a disability who may require assistance during evacuations to express their needs and concerns to their regional managers.</li><li>• The NCE PwD will be consulted as new emergency and evacuation plans are developed, in line with new work environments and hybrid work model.</li></ul>
Floor warnings and pathways may be an impediment to some employees.	<ul style="list-style-type: none"><li>• Consider tactile indications on the floor outside of workstations, hallways, equipment rooms, kitchen, and/or washroom areas, that will enable employees with a visual impairment to prepare for a change in floor surface.</li><li>• Communication reminding employees that pathways should also be kept clear of any potential impediments, such as cords and wires.</li><li>• Consider wayfinding using technology for larger offices.</li></ul>
Boardrooms are not fully accessible.	<ul style="list-style-type: none"><li>• Review all boardrooms across the country to ensure that they are accessible and equipped for hybrid meetings.</li><li>• Whenever possible, rectangular tables should be replaced with oval shaped tables, and additional chairs of varying sizes added.</li><li>• Meeting rooms should have microphones to facilitate participation for employees with a hearing disability. This is especially the case for hybrid meetings where some participants may be in a meeting room while others attend remotely.</li><li>• Prioritized workplan is to be developed in collaboration with NCE.</li></ul>

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Barriers Identified for the Built Environment	Focused Activities to Remove and Prevent Barriers for the Built Environment
Common areas are not fully accessible.	<ul style="list-style-type: none"><li>• Ensure that chairs in the kitchen are not fixed to the floor or table. This allows for chairs to be moved to accommodate a person in a wheelchair. Furniture should preferably be constructed of environmentally safe, low-emission, and formaldehyde-free materials to reduce the risk of adverse reactions and disability in persons with environmental sensitivities.</li><li>• FMA to collaborate with NCE PwD to prioritize immediate requirements.</li></ul>
Uniform lighting schemes may cause challenges to employees with sensory sensitivities.	<ul style="list-style-type: none"><li>• To assist persons with low vision, adequate lighting should be installed to guarantee consistent levels of illumination in hallways and circulation areas.</li><li>• Boardrooms should also be equipped with different intensities of lighting and/or sets of lights that can be used independently or together. This allows for maximum flexibility when accommodating persons with different types of visual impairments for different purposes.</li><li>• Replacement of pattern-noisy venetian blinds with roller blinds can also improve lighting.</li><li>• The FMA continues to work with PSPC and design consultants to ensure the proper lighting is installed in offices during a refit project. A workplan is to be developed in collaboration with the NCE PwD, to prioritize immediate requirements.</li></ul>
Parking areas for cars and bicycles are not accessible and sometimes are not sufficient to accommodate all employees who are entitled to use them.	<ul style="list-style-type: none"><li>• Review parking areas for all PPSC buildings (government-owned buildings and rental buildings), communicate information regionally to all employees, and ask if additional parking is required.</li><li>• FMA can play an advocacy role on a case-by-case basis with landlords.</li></ul>
Stairs cause a barrier for some employees.	<ul style="list-style-type: none"><li>• Where possible, ramps should be used instead of stairs for transitions between one level and another. Where stairs cannot be avoided, ramps may provide an alternative. Ramps should be easily accessible and large enough for persons using a motorized wheelchair.</li><li>• Edge of stairs should be clearly marked using both brightly coloured strips and a change in the texture of the floor.</li><li>• FMA to collaborate with NCE, to prioritize immediate requirements.</li></ul>
Visual signage is lacking and is a barrier for employees with a visual disability.	<ul style="list-style-type: none"><li>• Ensure tactile signs, using Braille and raised letters/numerals, are located outside of every workstation and boardroom throughout the workplace.</li><li>• Eliminate or reduce “help” buttons to call for assistance.</li><li>• FMA to collaborate with NCE PwD on signage moving forward.</li></ul>



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Barriers Identified for the Built Environment	Focused Activities to Remove and Prevent Barriers for the Built Environment
Size of rooms and workstations is a barrier for employees using mobility devices.	<ul style="list-style-type: none"><li>• When designing the layout of workstations, consideration should be made for current and future employees who use a wheelchair or motorized scooter.</li><li>• A work plan is to be developed in collaboration with NCE PwD, to prioritize immediate requirements.</li></ul>
Switches and controls may be out of reach for some employees.	<ul style="list-style-type: none"><li>• FMA to collaborate with NCE PwD to identify and develop a work plan to remediate existing situations.</li></ul>
Persons with environmental sensitivities may have issues when moving to newly renovated buildings.	<ul style="list-style-type: none"><li>• Moves into newly renovated spaces should be timed to allow emissions from new carpeting or equipment to dissipate prior to occupancy so as to minimize the potential for adverse reactions from those with environmental sensitivities.</li><li>• The workplace should be designed to create an environment that is fully accessible by persons with environmental sensitivities. This includes a well ventilated environment with tolerable, low-emission building materials and furniture, as well as unscented, low-emission cleaning and maintenance products. A more enclosed workstation may be required to accommodate an employee's sensitivities.</li><li>• Ensure communication of scent-free policies within all regional offices and add signage to remind employees.</li></ul>
Washroom facilities are a barrier for some employees.	<ul style="list-style-type: none"><li>• Review of all washroom facilities across the country. Continue to advocate for adequate washrooms in line with our requirements and realities.</li><li>• Locked bathrooms are a barrier. If a bathroom has to be locked for security reasons, it should have a motorized door and a simple unlocking mechanism.</li><li>• Bathrooms should be large enough to accommodate a person in a motorized wheelchair or scooter while providing an adequate amount of privacy.</li><li>• FMA to collaborate with NCE PwD to identify and develop a work plan to remediate existing situations.</li><li>• Multiple accessible washrooms should be available as single accessible washrooms are often preferred for use by able-bodied people and therefore not available for employees with mobility issues.</li><li>• Ensure railings are installed on walls near the facilities in the accessible stall or washroom to provide assistance for people with disabilities to move to and from their wheelchair or scooter.</li></ul>

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	<ul style="list-style-type: none"> <li>• Ensure that air fresheners and deodorizers are not used in washroom facilities in order to avoid health risks for persons with environmental sensitivities and asthma.</li> <li>• Access to gender-neutral bathrooms should be available and designed to take into account the capacities of those who use electric wheelchairs and their support workers. Those support workers may not be the same gender as their client.</li> </ul>
<p>Width of primary aisles and secondary pathways is a concern for employees with a mobility challenge.</p>	<ul style="list-style-type: none"> <li>• These should all be wide enough to accommodate two people who use wheelchairs to pass each other safely. Updated Building Codes have already started to address the issue of primary and secondary aisles in office settings. FMA will work closely with design consultants to ensure these dimensions are being met in future refit projects.</li> <li>• FMA to collaborate with NCE PwD to identify and develop a work plan to remediate existing situations.</li> </ul>

### PILLAR 2 Stakeholders

NCE PwD sub-group leader:	Heather Russell
Sub-group members:	John Hartman Racel Padua Sarah Wilkinson
Sub-group supported by:	Jason Mitschele and Norma Pavoni, co-chairs of the NCE PwD
Internal stakeholders consulted:	Anna Aggelopoulos – Manager, Facilities Management and Accommodations Services Unit  Marc Chamailard – Executive Director, Security Services and Facilities Management Division

## PILLAR 3 – INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)

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**Quote from the pillar co-lead, Joshua Hunt, who self identifies as having a cognitive disability, light sensitivity, and right-side muscle weakness:** *“I was diagnosed 24 years ago with a brain tumor, and underwent treatments to have it removed. Since then, I have lived with the various challenges brought on by the side effects of the removal and the treatments. With my disability, I have felt welcomed and appreciated at the PPSC. I was able to experiment with various types of technologies in the past couple of years. I hope to bring some awareness on the many types of electronic aids that are available and that can help employees living with different types of disabilities.”*

### Consultations

In September of 2021, the PPSC created its very first employee council, the NCE PwD. This employee-led council has since been at the center of the conversations on how to make the PPSC more accessible. This committee currently counts seventeen (17) members.

In May of 2022, the PPSC launched an online survey aimed at gathering specific data on the barriers experienced by employees living with a disability across all regions. Three hundred and sixty-six (366) employees took the survey, one hundred and thirty-four (134) of whom indicated that they live with a disability.

The following three (3) questions were asked in the national accessibility survey for the Information and Communication Technologies Pillar. Annex C contains a detailed account of the data compiled from the survey.

- What is your level of satisfaction with the ergonomic and/or adaptive equipment you have been provided with to do your work? (Question for PwD only)
- Do you feel supported by IT specialists when you have questions or concerns regarding the accessible software and technologies that you are currently using at the PPSC? (Question for PwD only)
- Are virtual meetings and events fully accessible to you? (Question for all employees)

Results from our internal survey revealed that a large number of employees seemed satisfied with the services provided by IT specialists. In fact, only twelve percent (12%) of employees said that they were not satisfied with the ergonomic and/or adaptive equipment they have been provided with to do their work, and thirty-nine percent (39%) feel supported by IT specialists when they have questions or concerns regarding the accessible software and technologies they are currently using. Finally, nine percent (9%) of our employees mentioned that virtual meetings are not fully accessible, which means that we need to make some progress on that front. As well, we realized that our organization was lacking in some aspects related to ICT while completing the Accessibility Self-Assessment tool.

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Generally, comments received for this particular pillar were as follows:

- IT specialists are limited.
- Employees feel supported by AACT, not as much by IT specialists at the PPSC.
- It can take too long to have anything IT related implemented due to red tape or IT specialists' workloads.
- When IT specialists are on site, they are usually very knowledgeable. However, employees usually share them with other locations.
- Service through the HelpDesk is somewhat long, taking on average a few days before getting a response, and the problem is usually not fixed immediately.
- Support seems to be lacking for new employees.

We also considered the PSES 2020 results for our department to the following question that specifically touched on the ICT pillar: "I have the tools, technology and equipment I need to do my job." Sixty-nine percent (69%) of PwD who answered (57 employees) said 'yes', as opposed to seventy-five percent (75%) of able-bodied respondents (575 employees).

On September 14, 2022, we began a consultation process with an IT senior project manager who was designated by the Director General responsible for this pillar. We discussed the following questions:

- Has the PPSC assessed its level of maturity in managing and implementing ICT accessibility, using the GC ICT Accessibility Maturity Model?
- Do we track user feedback on accessibility issues in ICT?
- Do we have a formal ICT accessibility testing policy (EN 301 549, WCAG 2.2 AA, WCAG 2.1 AA or WCAG 2.0 AA)?
- Have IT staff received training on how to develop and deliver accessible and inclusive ICT solutions?

Upon investigation, the answer to all of these questions was 'no'. However, there was an openness and willingness from the IT Project Manager to raise awareness and provide training so that our department can meet all required accessibility standards when providing ICT solutions.

### Findings for ICT

Barriers Identified for ICT	Focused Activities to Remove and Prevent Barriers for ICT
<p>Accessibility not taken into consideration in the development of ICT tools and solutions.</p>	<ul style="list-style-type: none"> <li>• Use the ICT Accessibility Maturity Model to help us self-assess against established standards. This internal self-assessment tool will help us define our strengths as well as our shortcomings.</li> </ul>
<p>Lack of tracking user feedback on accessibility issues.</p>	<ul style="list-style-type: none"> <li>• Provide all employees with a generic email address where concerns about accessibility and barriers can be sent and followed-up with in a timely manner by the Accessibility Officer. The new email address is: <a href="mailto:PPSCAccessibilityFeedback@ppsc-sppc.gc.ca">PPSCAccessibilityFeedback@ppsc-sppc.gc.ca</a> / <a href="mailto:SPPCRetroactionAccessibilite@ppsc-sppc.gc.ca">SPPCRetroactionAccessibilite@ppsc-sppc.gc.ca</a></li> <li>• Provide all employees with a toll-free number where they can call in and leave a message about accessibility and any type of barrier. Create and publish service standards. The new number is: 1-833-791-1086. Callers will have the option of identifying themselves and receiving follow-up, or providing confidential information on any barrier experienced in our department.</li> <li>• Create an Accessibility Feedback Form on our iNet in order to track user feedback on accessibility issues.</li> <li>• Identify a tracking tool (SharePoint or GCdocs with limited access for the ACEDIA) to track all accommodation and workplace adjustment requests.</li> </ul>
<p>IT service delivery for Pw D is sometimes long and requires multiple follow-ups.</p>	<ul style="list-style-type: none"> <li>• Find a way to enhance IT service delivery for Pw D. Suggest identification at first point of contact with the Justice service desk (PPSC + Pw D) to make triage more effective within PPSC. Explore potential privacy concerns.</li> <li>• Develop a checklist to assist with their initial triage of requests.</li> <li>• Communicate this new way of proceeding to Pw D.</li> <li>• Send a pulse survey 12-18 months after setting up this new service to make sure that this enhancement is helpful for Pw D.</li> </ul>
<p>Lack of formal ICT accessibility testing policy (provided only on an ad hoc basis).</p>	<ul style="list-style-type: none"> <li>• Use the ICT Accessibility Maturity Model to help us self-assess against established standards. This internal self-assessment tool will help us define our strengths as well as our shortcomings.</li> <li>• Ensure that accessibility testing becomes a normal part of application development methodology.</li> <li>• Ensure that Pw D are consulted before the launch of Amicus and any new or updated IT application. Provide IT with the names of one or more Pw D, which would include a senior paralegal and/or a prosecutor, to join the team and provide guidance on accessibility.</li> <li>• Consult with departments who are more advanced in this regard.</li> </ul>

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Barriers Identified for ICT	Focused Activities to Remove and Prevent Barriers for ICT
IT technicians are not equipped to develop and deliver accessible and inclusive ICT solutions.	<ul style="list-style-type: none"><li>• Update learning plans, as required, for staff in IT.</li><li>• Ensure that training related to accessibility becomes mandatory for all IT staff.</li><li>• Additional reliance on AAAC, experts in the field, for training and consultation.</li><li>• Ensure that accessibility is part of the onboarding process for new IT personnel.</li><li>• Members of our NCE PwD should, whenever operationally possible, test all new technology, software, and IT tools before purchase and rolling out. Consider bringing in a consultant when needed.</li></ul>
Issues with using certain types of hardware.  The tablet: too small to read, inadequate for use in court and for working while travelling.  Issues reported with braille displays.	<ul style="list-style-type: none"><li>• Consult employees before issuing new tools.</li><li>• Ensure appropriate training before issuing new tools for employees and IT personnel.</li><li>• Ensure new devices undergo hands-on testing by PwD.</li><li>• Collaborate with AAAC.</li><li>• Find ways for IT personnel to enhance the service delivery for PwD. This could mean, in some instances, keeping a ticket open until all parties agree that the situation is resolved.</li></ul>
Lack of awareness of services and possible accommodation available.	<ul style="list-style-type: none"><li>• Communication of tools and services available for all employees and services provided by AAAC.</li><li>• Basic information will be published on our iNet (see Pillar 4 – Communications).</li></ul>
Delays or slowness in processing requests for accommodation and obtaining required adaptive equipment.	<ul style="list-style-type: none"><li>• Enhance IT service delivery for PwD. Identification at first point of contact with the Justice service desk (PPSC + PwD) which will make triage more effective within PPSC.</li><li>• Create a centralized hub that would be responsible for accessibility with a centralized budget (see details under Pillar 1 of this Plan as the PPSC is considering the establishment of a one-stop-shop for everything related to accessibility and individualized workplace adjustments).</li></ul>
Virtual meetings are not fully accessible.	<ul style="list-style-type: none"><li>• Consider getting evaluation copies of software for testing prior to purchasing.</li><li>• Consider providing sign language interpretation at all staff meetings for employees with hearing impairments. This will be explored under Pillar 4 – Communications.</li><li>• Consider hiring a company that will provide closed captions in both English and French during bilingual meetings. This will be explored under Pillar 4 – Communications.</li><li>• Provide etiquette, guidance, and training for all employees about their responsibilities in hosting accessible meetings.</li></ul>

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Barriers Identified for ICT	Focused Activities to Remove and Prevent Barriers for ICT
	<ul style="list-style-type: none"> <li>• Provide information to employees on how they can remove noise and notifications from Emojis, chats, and other messages appearing on the screen during online meetings.</li> <li>• Advise all employees of the possibility of recording important meetings (audio or video). Recordings can be broken down and watched at the convenience of the employee.</li> <li>• Publish best practices for virtual meetings.</li> <li>• Monitor, provide guidance, and perform post-mortem accessibility analysis of national events.</li> </ul>
Hearing Impairments: Employees report having difficulty to hear phone messages and following conversations.	<ul style="list-style-type: none"> <li>• Provide training to IT technicians so they can assist employees on using iPhone hearing assistive technologies.</li> <li>• Provide information to managers on how to support employees living with hearing impairments. Connect with the Supervisors' Network to make sure that this information is readily available.</li> <li>• Provide etiquette, guidance, and training for all employees about their responsibilities to support employees with hearing impairments.</li> </ul>

PILLAR 3 Stakeholders	
NCE PwD sub-group co-leaders:	Joshua Hunt and Norma Pavoni
Sub-group members:	Jamileh Torkpour Neal Rice
Sub-group supported by:	Jason Mitschele, co-chair of the NCE PwD
Internal stakeholders consulted:	Violet Fox – Director, Information Technology Devin Petovello - Manager, Infrastructure / Operations Joan Ryan - Manager, Enterprise Solutions John Taylor – Project Manager

## PILLAR 4 – COMMUNICATION, OTHER THAN INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)

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**Quote from the pillar lead, Jacques Hardy, who self identifies as having ADHD, Post-Traumatic Stress Disorder (PTSD) and a mental health disability:** *“Our ability to effectively communicate is what allows us to be part of something bigger than us. Denying this ability to the few who need us to go the extra mile is like denying their humanity.”*

### Consultations

In September of 2021, the PPSC created its very first employee council, the NCE PwD. This employee-led council has since been at the center of the conversations on how to make the PPSC more accessible. This committee currently counts seventeen (17) members.

In May of 2022, the PPSC launched an online survey aimed at gathering specific data on the barriers experienced by employees living with a disability across all regions. Three hundred and sixty-six (366) employees took the survey, one hundred and thirty-four (134) of whom indicated that they live with a disability.

Annex C contains a detailed account of the questions asked as well as the data compiled from the survey. Below are the three (3) questions asked to all employees in our national accessibility survey for the Communication pillar:

- Would you benefit from training in making documents more accessible? There are a few straightforward ways to make documents significantly more accessible to people with disabilities, including those with visual impairments, learning disabilities and intellectual disabilities.
- Do you feel that PPSC communications are written in plain language? Plain language is a writing technique of organizing information in ways that make sense to the reader. It uses straightforward, concrete, familiar words. Plain language helps the writer adapt what they have to say to the reading abilities of the people who are most likely to read the document.
- How often do you consciously use plain language in your written communications?

Respondents provided comments relating to the following disabilities: mental health, hearing, speech, cognitive, and vision. Survey results were divided to better understand the perceptions from PwD and those of managers and allies.

Generally, comments received were as follows:



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- Employees living with auditory and vision impairments feel as though they are invisible to those who are not aware of their issues.
- The PPSC does not openly discuss these issues, which results in employees feeling as though their challenges are not acknowledged.
- Among the many solutions suggested, a standard checklist for nation-wide events stood out. This includes addressing the required enhanced support during bilingual meetings, making full use of technological advances, and holding managers accountable in their performance agreements.
- Similar solutions should be implemented to standardize all communications (announcements, newsletters, meeting aids and emails to all staff). This will be a long-term objective for our department as communications are currently de-centralized.

## Findings for Communication, other than ICT

Barriers Identified for Communication, other than ICT	Focused Activities to Remove and Prevent Barriers for Communication, other than ICT
<p><b>Mental health:</b> PwD dislike the practice by some supervisors and managers of sending email communications at any hour of the day/night.</p> <p>This affects employees' ability to have a proper work-life balance, which may impact PwD who are negatively affected by stress.</p>	<ul style="list-style-type: none"> <li>• Look into implementing a core hours policy for corporate emails, while taking into account the various time zones.</li> <li>• Plan for education and awareness of managers and supervisors on email notifications and their expectations when these are sent outside of the employee's regular working hours.</li> <li>• Advancement Centre for EDIA and Mental Health and Wellness Steering Committee to share best practices with employees to safeguard work/life balance.</li> </ul>
<p><b>Hearing Impairments:</b> Capacity to retain information is hindered when only verbal communication is used.</p> <p><b>Cognitive Impairments:</b> Learning options are limited. The Public Service favours oral presentations and self-paced courses as their main delivery method to learning.</p> <p>Employees with cognitive disabilities may process information at a different pace, or best learn new material through alternative mediums.</p>	<ul style="list-style-type: none"> <li>• Provide etiquette, guidance, and training for all employees about their responsibilities to support employees with hearing impairments.</li> <li>• Engage with the Supervisors' Network to make sure that information is readily available for supervisors and managers.</li> <li>• Increase awareness and publish information/helpful tips on interacting with employees with hearing and cognitive impairments on our iNet, and prepare regular communications from our NCE PwD.</li> <li>• Publish accessibility protocols and tools for meetings on our iNet.</li> <li>• Look into the possibility of having onboarding material available in alternate format. This will be further explored under Pillar 1 – Employment.</li> </ul>
<p><b>Hearing Impairments:</b> Plexiglas barriers in courtrooms prevents sound from carrying properly and may disrupt the functioning of hearing aids. It may also distort sounds to the point that some employees are unable to fully understand what is being said during a court hearing.</p>	<ul style="list-style-type: none"> <li>• PPSC Senior Regional Management to approach courts to request accommodation during hearings where courthouses still have Plexiglas installed in their courtrooms.</li> <li>• Advancement Centre for EDIA to provide support to management as needed.</li> </ul>

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Barriers Identified for Communication, other than ICT	Focused Activities to Remove and Prevent Barriers for Communication, other than ICT
<p><b>Hearing Impairments:</b> Pw D report having inadequate support from colleagues. Some showed a lack of care when asked to speak clearly, to repeat what was said, or to provide a clear view of their lips to assist with lip reading.</p> <p><b>Speech impairments:</b> Pw D report being excluded during conversations in general, giving them a disadvantage in their development.</p>	<ul style="list-style-type: none"><li>• Consider providing American Sign Language (ASL), Quebec Sign Language (QSL) and ISL (Indigenous Sign Language) interpretation at all staff meetings for employees with hearing impairments.</li><li>• Consider hiring a company that will provide closed captions in both English and French during bilingual meetings.</li><li>• Consider using an accessible software during bilingual meetings, that will provide interpretation as well as closed captions in both English and French.</li><li>• Provide etiquette, guidance, and training for all employees about their responsibilities to support Pw D with hearing and speech impairments.</li><li>• Publish best practices for meeting hosts on our iNet or the PPSC Insider.</li><li>• Consider having our NCE Pw D develop learning events to promote employees living with a hearing and/or speech impairment and explain the expected behaviors of allies.</li><li>• Provide meeting handouts well enough in advance to allow Pw D the time required to properly review and process the information prior to discussions.</li><li>• Engage with the Supervisors' Network to make sure that information is readily available for supervisors and managers.</li></ul>
<p><b>Vision Impairments:</b> It is sometimes difficult for Pw D to read certain material due to poor choice in colour-coding schemes</p>	<ul style="list-style-type: none"><li>• Review visual components for all corporate templates, which would ensure standardization of colour-coding schemes, and present options that allow high contrasts.</li><li>• Increase awareness of colour-coding schemes and their importance for some employees through an article published in the PPSC Insider or on our iNet.</li><li>• Engage with the Supervisors' Network to make sure that information is readily available for supervisors and managers.</li></ul>
<p><b>Vision / Cognitive Impairments:</b> Not all communications are friendly to read-aloud technologies. Most employees are not aware of the technologies available to make communications more accessible.</p>	<ul style="list-style-type: none"><li>• Promote learning events to help employees understand why accessible documents are important for the PPSC, and clarify that there is an expectation for employees to comply with this standard in all of their communications.</li><li>• Consider mandatory training on making documents accessible for all employees.</li><li>• Ensure that communications sent out to all employees are verified for accessibility compliance. Consult various internal stakeholders to determine how this will be implemented given decentralized communications.</li><li>• Ensure that communications sent out to all employees come with the mention that "This document is available in alternate formats</li></ul>

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Barriers Identified for Communication, other than ICT	Focused Activities to Remove and Prevent Barriers for Communication, other than ICT
	<p>upon request". Plan for an open contract with a company that specializes in alternate formats.</p> <ul style="list-style-type: none"><li>• Provide information to employees on how to use the various functions available in Microsoft and Foxit to help make their communications accessible to read-aloud technologies.</li><li>• Provide information related to simple adaptive technologies that are available to all employees, like assistive writing aids. Create comprehensive lists for ease of access and post the information on our iNet.</li><li>• Engage with the Supervisors' Network to make sure that information is easily accessible for supervisors and managers.</li></ul>
<p><b><u>Vision / Cognitive Impairments:</u></b> Signature blocks are not accessible.</p>	<ul style="list-style-type: none"><li>• Provide guidance to all employees on accessible signature blocks.</li><li>• Advancement Centre for EDIA to send a follow-up communication to ensure that all employees follow the standard.</li><li>• Review badges created by communications for use by the NCE PwD in their signature blocks, and ensure that they are accessible.</li></ul>
<p><b><u>Vision / Cognitive Impairments:</u></b> Corporate templates and publications are not accessible. Day-to-day communications, such as emails, also require a standardization to ensure they are accessible.</p>	<ul style="list-style-type: none"><li>• Review templates and formatting in emails in order to standardize all communications, such as those sent from various national committees (PDF vs Word).</li><li>• Ensure that members of the NCE PwD test all new templates or tools before rolling them out.</li><li>• Develop a list of documents that require review and develop a priority list. Schedule a timeline for all of these documents to become accessible.</li></ul>
<p><b><u>Cognitive Impairments:</u></b> Employees do not appreciate the importance of using plain language in email communications</p>	<ul style="list-style-type: none"><li>• Develop or promote learning events to help employees understand why plain language is important for the PPSC. Clarify there is an expectation for employees to comply with this standard in their communications.</li><li>• Engage with the Supervisors' Network to make sure that information is readily available for supervisors and managers and provide support to managers who wish to use plain language in their communications.</li><li>• Collaborate with our Communications Division to extend training to all employees on the expectations and benefits of using plain language.</li><li>• Consider having plain language training become mandatory for all employees.</li><li>• Regular communications will be required and a communication plan will be developed.</li></ul>

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PILLAR 4 Stakeholders	
NCE PwD sub-group leader:	Jacques Hardy
Sub-group members:	Neal Rice Heather Russell
Sub-group supported by:	Jason Mitschele and Norma Pavoni, co-chairs of the NCE PwD
Internal stakeholders consulted:	Alessia Bongiovanni - Director, communications Marissa Martin – Senior Communications Advisor

## PILLAR 5 – THE PROCUREMENT OF GOODS, SERVICES AND FACILITIES

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**Quote from the pillar lead, Neal Rice, who self identifies as having misophonia, a sensory disability:** *"Meaningful consideration of accessibility in the initial stages of all procurement conversations ensures that there are no barriers placed between our employees and the usability of the commodity. Our sub-group's dual purpose is to engage stakeholders and end users as well as to develop and produce tools and resources to assist technical authorities in achieving this goal of meaningful consideration."*

### Consultations

In September of 2021, the PPSC created its very first employee council, the NCE PwD. This employee-led council has since been at the center of the conversations on how to make the PPSC more accessible. This committee currently counts seventeen (17) members.

The sub-group leader, Neal Rice, has been participating to meetings of the new Community of Practice called 'Agents of Change for Accessible Procurement' since June of 2022. This community aims to create a safe and respectful place for procurement professionals to come together to share knowledge and experiences in a spirit of mutual learning and peer support. Some information shared here includes:

- Employment and Social Development Canada's 2019 Survey on Accessibility found that for employment-related barriers, twenty-four percent (24%) witnessed a barrier to having access to supports or workplace accommodations;
- The Accessible Procurement Resource Centre (APRC) at Public Services and Procurement Canada (PSPC) was established in 2018 to support federal departments and agencies in considering accessibility in the procurement requirements for goods and services; and,
- Accessibility Standards Canada was created in 2019, with a mandate to contribute to the realization of a Canada without barriers through the development and revision of accessibility standards, as well as the promotion, support, and conduct of research into the identification and removal of barriers, and the prevention of new barriers.

Since the national accessibility survey was long, with significant work directly with the Chief Procurement Officer at the PPSC, we decided not to survey the entire department on this particular pillar, but focused more specifically on the NCE PwD. Discussions on how to ensure that an accessibility component is present in all procurement processes have been regular and ongoing since June 20, 2022, with the Chief Procurement Officer, who has been fully supportive of the sub-group's work. These meetings are also used as brainstorming sessions to ensure that all procurement conversations include user accessibility by default from the outset of procurement planning.

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Discussions surrounding current barriers to accessibility in procurement strategies are ongoing and evolving as new information is available.

As well, after completion of the Accessibility Self-Assessment Tool, we realized that accessibility was only being addressed in the procurement process of ICT products and services on an ad hoc basis.

The following questions were asked to the NCE PwD by way of a confidential survey using Office Forms. These questions were sent a week prior to a meeting held on September 21, 2022, date on which we gave a background presentation of this pillar and discussed the survey. Annex C contains a detailed account of the questions asked in a confidential short survey sent to the NCE PwD. This Annex also contains a detailed account of the data compiled from the survey.

- Have you or someone you know ever experienced accessibility barriers in procurement (considering either accommodation requests or general office procurement) ?
- What barriers have you experienced and how were you able to solve or address them?
- What aspects of the procurement process were effective and what aspects should be improved?
- What were the impacts of the delays on your work and/or personal health?
- What does meaningful consideration of accessibility in procurement look like to you?
- Have you or someone you know encountered issues in defining user requirements for accommodation requests?
- Tell us a bit about the situation or issue you encountered with defining user requirements.
- In cases where there is no individual accommodation request, how are accessibility impacts factored into procurement decisions? (For example, office furniture or computer software procured for an entire team will have impacts on accessibility for each user).

## Findings for The Procurement of Goods, Services and Facilities

Barriers Identified for The Procurement of Goods, Services and Facilities	Focused Activities to Remove and Prevent Barriers for The Procurement of Goods, Services and Facilities
Accessibility is not always meaningfully considered in procurement conversations and insufficiently codified in contract mechanisms.	<ul style="list-style-type: none"><li>• Ensure that accessibility requirements are clearly defined and identified in tenders, requests for proposals and contracts.</li></ul>
Vendors do not always meet accessibility criteria required in the contract.	<ul style="list-style-type: none"><li>• Capture and follow-up on vendor non-compliance and any reasonable accommodation proposed.</li></ul>
Project or technical authorities do not have sufficient training or resources to understand how to incorporate accessibility into procurement conversations.	<ul style="list-style-type: none"><li>• Develop a standard template for national use in preparing procurement requests:<ul style="list-style-type: none"><li>○ Links to relevant resources.</li><li>○ Questions to ask before developing accessibility criteria.</li></ul></li></ul>

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	<ul style="list-style-type: none"><li>○ Build-in justification section to replace current accessibility justification form.</li><li>● Provide training to key stakeholders on implementation of new template:<ul style="list-style-type: none"><li>○ Acquisitions Team – continue to play challenge function to ensure accessibility considered in a meaningful way.</li><li>○ Regional managers – principally act as project or technical lead.</li><li>○ Senior managers.</li></ul></li></ul>
<p>Delays and “red tape” in procurement of equipment to meet accessibility requirements and/or accommodation requests.</p>	<ul style="list-style-type: none"><li>● Identify “pain points” in procurement process.</li><li>● Collaborate with Occupational Health and Safety (OHS) group to identify causes of delays and develop suggested guides / reference tools.</li></ul>
<p>Denial of accessible equipment.</p>	<ul style="list-style-type: none"><li>● Tailored education for all stakeholders:<ul style="list-style-type: none"><li>○ Acquisitions Team.</li><li>○ Regional managers.</li><li>○ Senior managers.</li></ul></li><li>● Review, enhance, and promote escalation / appeal process:<ul style="list-style-type: none"><li>○ Explore recourse options for employees who pre-approve one type of equipment for their accommodation then receive another solution instead.</li><li>○ Consider a centralized budget for accommodations.</li></ul></li></ul>
<p>Acquisitions Team is responsible for playing a “challenge role” to ensure that accessibility is meaningfully considered in all procurement requests. However, they feel ill-equipped to perform this role as they have insufficient information and/or training on what constitutes meaningful consideration.</p>	<ul style="list-style-type: none"><li>● Engage with Acquisitions Team to provide insight on what meaningful consideration means to those living with a disability.</li><li>● Encourage Acquisitions Officers to reach out to the NCE any time they come across a situation where they feel ill-equipped to perform the challenge function.</li><li>● Codify collaboration requirements in justification form / toolkit.</li></ul>
<p>Too often, employees with disabilities are required to request accommodation due to a general procurement being inaccessible (e.g. office chairs, tablets, software).</p>	<ul style="list-style-type: none"><li>● All procurement must be based on the premise of “inclusive by design and accessible by default”.</li><li>● Education / training to decision-makers: making sure accessibility is accounted for at the onset usually saves time and money in the long run.</li><li>● New equipment procured for an office must not create any new barriers, and should address pre-existing barriers.</li></ul>

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## PILLAR 5 Stakeholders

NCE Pw D sub-group leader:	Neal Rice
Sub-group members:	Adam Halliday Bethany Johnson - Theedom
Sub-group supported by:	Jason Mitschele and Norma Pavoni, co-chairs of the NCE Pw D
Internal stakeholders consulted:	Luc Roussy – Chief Procurement Officer



## PILLAR 6 – THE DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

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For this last pillar, focus was given to a service that is currently under development and that will be available to the public.

On November 10, 2022, an initial meeting took place with the manager of operations of the National Fine Recovery Program (NFRP). The purpose was to gather details regarding the new online payment solution for collection of federal fines.

The PPSC is responsible for administering the NFRP under the terms of an assignment issued by the Attorney General of Canada in September 2007. The mandate of the NFRP is to enforce sentences by recovering outstanding court-ordered fines levied against individuals and companies convicted under federal statutes. Outstanding fines are recovered through various types of interventions, including private collection agencies, set-off of income tax refunds and GST/HST credits through the Canada Revenue Agency, payment negotiations, and in-house legal operations.

A new portal is being developed which will make it possible for debtors to pay their outstanding fines online, in the comfort of their home, while using their credit cards. The other options currently available for debtors are the following:

- Sending a check, bank draft, or money order by mail to our offices for processing. Payment may be partial or for the full amount.
- Going to any courthouse in the province where the fine was ordered and paying the fine by cash, credit, check, or debit. Payment may be partial or for the full amount.

The new portal has been in development for nearly two (2) years. It will appear on our public-facing website: <https://www.ppsc-sppc.gc.ca/eng/tra/pia-efp/nfrp-pnra.html>

The portal will give a general explanation of the mandate of the NFRP and will give debtors a privacy disclaimer to read and accept before they make a payment. A simple form has been developed with standard, easy to fill fields. The debtor can choose to either make a full payment or a partial payment of their fine.

The IT department, the Finance and Acquisitions Directorate, as well as the Communications Division have been consulted throughout the development of this project. This new portal should be available to the public by December 2022.

Debtors will have the possibility of either calling a toll-free number or emailing the NFRP should they experience any kind of issue with the new portal.

The accessibility of the website was assessed by the Communications Division. The manager of operations of the NFRP has agreed to share the links to the test environment webpages, which are in the process of being finalized, with four (4) members of our NCE PwD, for testing and feedback. NCE members will check for barriers, biases and plain language.

Although employees who developed this portal have not received specific training on how to develop and deliver accessible and inclusive programs and services with a specific focus on serving persons

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living with disabilities, we are confident that the website will be accessible, and we will make it a priority to address any feedback received from the public in that regard.

As this portal is at its final stages before launching into production, any further changes resulting from our accessibility testing will be identified for remediation in the next deployment phase and may not be captured in the initial launch of the site.

Comments and feedback from the NCE PwD will be sent to the development team. The NFRP will try to integrate these in the current phase. If this is not possible, the NFRP will advise the NCE as to when it can expect to deploy an updated version.

As well, it is important to note that the PPSC Pay a Fine site redirects the user to a Moneris payment site, where the credit card payment portion of the transaction is completed. The NFRP does not have any control over the content of the Moneris site. Should the NCE recommend any changes on this part of the fine payment solution, these will have to be directed through the office of the Receiver General, as they oversee the contract with Moneris for all Government of Canada departments and agencies. The NFRP already has a point of contact at the Receiver General's office for the contract with Moneris.

It is important to point out that our second National Accessibility Plan will be looking at how this particular pillar might apply to other areas of our practice, such as Agent Affairs, as well as more generally with regards to services directly linked to our core mandate.

#### PILLAR 6 Stakeholders

NCE PwD sub-group leader:

Norma Pavoni

Jason Mitschele

Leader supported by:

Joshua Hunt

Sarah Wilkinson

Internal stakeholder consulted:

Silvana Morales – Manager of Operations, National Fine Recovery Program

## **PILLAR 7 – TRANSPORTATION**

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Not relevant to our operations.

### GLOSSARY OF TERMS

TERMS	DEFINITIONS
AAACT	Accessibility, Accommodation and Adaptive Computer Technology, a division of Shared Services Canada, which offers a wide range of adaptations, alternate approaches, tools, training, services, resources and adaptive computer technologies for public service employees with disabilities or injuries.
Ableism	Discrimination or prejudice against individuals with disabilities.
ACA	Accessible Canada Act
ACEDIA	Advancement Centre for Equity, Diversity, Inclusion and Accessibility
Accommodation or Adjustment	<p>The Canadian Human Rights Commission defines it as making changes to certain rules, standards, policies, workplace cultures and physical environments to ensure that they don't have a negative effect on a person because of the person's mental or physical disability, religion, gender or any other protected ground. The Treasury Board of Canada Secretariat uses the following definition, which captures the spirit of the Accessible Canada Act: Solutions that address the barriers in the workplace, including adaptive tools, services and/or support measures. Examples include:</p> <ul style="list-style-type: none"> <li>▪ The broad range of mainstream and adaptive products and services that can improve participation of individuals with disabilities in the federal public service such as: <ul style="list-style-type: none"> <li>○ Equipment/tools (ergonomic chair, Braille display, angled writing surfaces and document holders/supports, printer, adjusted lighting);</li> <li>○ Services (CART services or sign language interpretation); and,</li> <li>○ Support measures (appropriate supports such as signage for allergies).</li> </ul> </li> <li>▪ Education for colleagues.</li> <li>▪ Written checklists or instructions.</li> <li>▪ Flexible work hours, as outlined in the terms and conditions of employment.</li> <li>▪ Planning for uninterrupted work time, which could include a quiet space, scheduling time to work 'offline', or working from a remote location.</li> </ul>
Adaptive equipment	Refers to software or equipment design to adapt or adjust the way in which regular workplace equipment or facilities are used, such as a screen magnifier, a screen reader, various types of assistive devices and software, such as a Braille printer that an employee needs to replace a computer screen.
Ally	Someone who supports the cause of a marginalized group and uses their privilege to learn from that group and amplify their cause. Someone who takes actions that will have lasting, beneficial effects.
Architectural or physical barriers	<p>Elements of building or outdoor spaces that create barrier to persons living with a disability. These barriers relate to elements such as the design of a building's stairs or doorways, the layout of rooms, or the width of halls. Other examples include:</p> <ul style="list-style-type: none"> <li>▪ Desks that are either too high or too low for a person who is using a wheelchair.</li> <li>▪ Poor lighting that makes it difficult to see for a person with low vision or a person who lip-reads.</li> <li>▪ Doorknobs that are difficult to grasp for a person with arthritis.</li> </ul>

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TERMS	DEFINITIONS
Attitudinal barriers	<p>Behaviors, perceptions, and assumptions that discriminate. These barriers often emerge from a lack of understanding, which can lead individuals to ignore, judge, or have misconceptions about a person living with a disability. Some examples include:</p> <ul style="list-style-type: none"> <li>▪ Assuming a person with a disability is inferior.</li> <li>▪ Assuming that someone with a speech impairment cannot understand you.</li> <li>▪ Forming ideas about a person because of stereotypes or a lack of knowledge.</li> <li>▪ Making a person feel as though you are doing them a “special favour” by providing their accommodations.</li> </ul>
Barrier	<p>As per the Accessible Canada Act, can mean 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.</p>
Disability	<p>As per the Accessible Canada Act, is defined as 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.</p>
EC	<p>The Executive Council is chaired by the DPP and comprised of the senior leadership team of the PPSC (LC and EX) that report directly to the DPP and DDPPs. The Council’s main mandate is to set the strategic direction and orientation of the organization on legal, policy, corporate management and law practice management issues. The council is also responsible for establishing and monitoring key departmental priorities and commitments.</p>
EDIA	Equity, Diversity, Inclusion, and Accessibility
Employees	Everyone working at the PPSC, including managers at all levels.
Equality	Everyone receives the same support measure. Treating everyone in the same manner.
Equity	Everyone receives the support measures that they need to make their experience equal. This means treating people fairly.
ICT	Information and Communication Technologies
Inclusion	Creating a workplace that is fair, equitable, supportive, welcoming, and respectful of all.
Intersectionality	Interconnected nature of social categorizations such as race, class, and gender, regarded as creating overlapping and interdependent systems of discrimination or disadvantage
NAAW	National AccessAbility Week
NCE	National Council of Employees
NCE PwD	National Council of Employees for Persons Living with a Disability

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TERMS	DEFINITIONS
Neurodiversity	Refers to the natural range of variation in human neurocognition. It includes the varying level of stimulation that a person must have to be productive.
Onboarding	Process of integrating an employee with a department and its culture, as well as getting the employee the tools and information needed in order for them to become a productive member of the team.
PSES	Public Service Employee Survey
PwD	Person living with a disability
SDOEEDI	Senior designated official for Employment Equity, Diversity and Inclusion
Senior Management	Senior management is composed of the Director of Public Prosecutions, both Deputy Directors of Public Prosecutions, all the Chief federal prosecutors, deputy chief federal prosecutors (legal managers - LC) and all directors - executives (EX) across the department.
Systemic barriers	Policies, procedures, or practices that can negatively affect accessibility and fairness for individuals or groups. They are often put into place unintentionally. An example would be a policy which requires all employees in hiring processes to complete exams in a specific time period, which may have a negative impact on some individuals with cognitive disabilities.
Technological barriers	<p>When a device or platform is not accessible to its intended audience and cannot be used with an assistive device. Technology can enhance the user experience, but it can also create unintentional barriers for some users. Technological barriers are often related to information and communications barriers. Some examples include:</p> <ul style="list-style-type: none"><li>▪ Electronic documents without accessibility features, such as alternate text (Alt Text), that screen readers read to describe an image.</li><li>▪ Material that is only available in hard copies.</li><li>▪ Requiring employees to use a website that does not meet accessibility standards.</li></ul>

### ANNEX A – CONTACT LIST FOR THE NCE – PWD

Region	Employee	Group	Disability
British Columbia	Heather Russell	LP	Congenital limb difference
Alberta	Adam Halliday	LP	Neurodivergent: visual-spatial non-specific learning difference & ADHD
Saskatchewan	None	***	***
Manitoba	None	***	***
Ontario	Jason Mitschele (co-chair)	LP	Blind
	Racel Padua	CR	Post-polio syndrome (mobility disability)
	John Hartman	CR	Cognitive and hearing disability
National Capital Region – HQ	Neal Rice	CT-FIN	Misophonia (sensory disability)
	Jacques Hardy	PE	ADHD, PTSD
	Paula Flood	PE	ADHD
	Sarah Wilkinson	LS	Neurodivergent, ulcerative colitis
	Penny-Laine Narlock	PE	ADHD, GAD
	Lucia GM	CR	Learning and neuropsychological disorder
Quebec	Jamileh Torkpour	AS	Depressive and anxiety disorder
Atlantic	Nathalie O'Brien	AS	ADHD
	Timothy A. McLaughlin	LP	Depressive and anxiety disorder
	Bethany Johnson-Theedom	AS	Chronic pain, auto-immune disease, and ADHD
Nunavut	None	***	***
NWT	None	***	***
Yukon	Ann Rudniski	CR	Hearing disability
	Joshua Hunt	IT	Cognitive disability and light sensitivity, and right side muscle weakness.

## ANNEX B – NATIONAL PPSC ACCESSIBILITY SURVEY

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# PPSC Survey: Employees Living with a Disability

2022

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Thank you for taking the time to complete this Public Prosecution Service of Canada (PPSC) employee check-in survey.

This survey will provide a better understanding of the various barriers currently faced by PPSC employees living with a disability. Disability is a broad category of experience that encompasses a wide range and degree of challenges, barriers, and impairments that affect many people and goes far beyond traditional ideas and stereotypes. To contextualize the definition provided and offer a stronger understanding of disability, a non-exhaustive list is included at the end of this survey.

There will be further opportunities to engage in this discussion as we go along. The survey will remain **open until June 9<sup>th</sup>, 2022**, and takes approximately **20 minutes** to complete. Your answers are very valuable, as they will help us assess the state of accessibility at the PPSC and guide us in the preparation of our National Accessibility Plan. If you prefer to answer these questions in a different manner (by phone or by email for example), please email the Advancement Centre for Equity, Diversity, Inclusion, and Accessibility at [PPSC Advancement Centre for EDI@ppsc-sppc.gc.ca](mailto:PPSC_Advancement_Centre_for_EDI@ppsc-sppc.gc.ca).

The PPSC is committed to protecting the privacy rights of individuals, including safeguarding the confidentiality of information provided by employees. All responses will be handled in accordance with the [Privacy Act](#) and [Government of Canada standards on public opinion research](#).

### Need help?

Should you encounter a technical difficulty while completing the survey, please contact [Nathalie O'Brien](#).

Select “Next page” to begin the survey.

### Definitions:

**Accommodation/Adjustment** – The Canadian Human Rights Commission defines it as making changes to certain rules, standards, policies, workplace cultures and physical environments to ensure that they don't have a negative effect on a person because of the person's mental or physical disability, religion, gender or any other protected ground. The Treasury Board of Canada Secretariat uses the following definition, which captures the spirit of the [Accessible Canada Act](#): Solutions that address the barriers in the workplace, including adaptive tools, services and/or support measures. Examples include the broad range of mainstream and adaptive products and services that can improve participation of individuals with disabilities in the federal public service such as equipment/tools (ergonomic chair, Braille display, angled writing surfaces and document holders/supports, printer, adjusted lighting), services (CART services or sign language interpretation), and



## Public Prosecution Service of Canada – Accessibility Plan 2022

### *Creating a culture of belonging for employees living with a disability*

support measures (appropriate supports such as signage for allergies, and education for colleagues, written checklists or instructions, flexible work hours, as outlined in the terms and conditions of employment, planning for uninterrupted work time, which could include a quiet space, scheduling time, or working from a remote location).

**Adaptive equipment** - Refers to software or equipment design to adapt or adjust the way in which regular workplace equipment or facilities are used, such as a screen magnifier, a screen reader, various types of assistive devices and software, such as a Braille printer that an employee needs to replace a computer screen.

**Ally** – Someone who supports the cause of a marginalized group and uses their privilege to learn from that group and amplify their cause.

**Barrier** - As per the Accessible Canada Act, can mean 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.

**Architectural or physical barriers** are elements of building or outdoor spaces that create barriers to persons living with a disability. These barriers relate to elements such as the design of a building’s stairs or doorways, the layout of rooms, or the width of halls. Other examples include:

- Desks that are either too high or too low for a person who is using a wheelchair.
- Poor lighting that makes it difficult to see for a person with low vision or a person who lip-reads.
- Doorknobs that are difficult to grasp for a person with arthritis.

**Attitudinal barriers** are behaviors, perceptions, and assumptions that discriminate. These barriers often emerge from a lack of understanding, which can lead individuals to ignore, judge, or have misconceptions about a person living with a disability. Some examples include:

- Assuming a person with a disability is inferior.
- Assuming that someone with a speech impairment cannot understand you.
- Forming ideas about a person because of stereotypes or a lack of knowledge.
- Making a person feel as though you are doing them a “special favour” by providing their accommodations.

**Systemic barriers** are policies, procedures, or practices that can negatively affect accessibility and fairness for individuals or groups. They are often put into place unintentionally. An example would be a policy which requires all employees in hiring processes to complete exams in a specific time period, which may have a negative impact on some individuals with cognitive disabilities.

**Technological barriers** occur when a device or platform is not accessible to its intended audience and cannot be used with an assistive device. Technology can enhance the user experience, but it can also create unintentional barriers for some users. Technological barriers are often related to information and communications barriers. Some examples include:

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- Electronic documents without accessibility features, such as alternate text (Alt Text), that screen readers read to describe an image.
- Material that is only available in hard copies.
- Requiring employees to use a website that does not meet accessibility standards.

**Disability** - As per the Accessible Canada Act, is defined as 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.

**Onboarding** – Process of integrating an employee with a department and its culture, as well as getting the employee the tools and information needed in order for them to become a productive member of the team.

**PwD** – Person living with a disability.

**Working on-site:** this includes the PPSC offices and permanent office space located in courthouses (e.g. Old City Hall (ON), Main Street (BC) and Laval (QC)).

**Working remotely** – a location other than a PPSC workspace or courtroom, typically your home.

## General Questions

1. Are you a person living with a disability, a supervisor/manager or a concerned employee? Check all boxes that apply. (Question for all employees)

I am a person living with a disability (Disability is a broad category of experience that encompasses a wide range and degree of challenges, barriers, and impairments that affect many people and goes far beyond traditional ideas and stereotypes. A disability can be visible or invisible. It can be permanent or temporary. It can also be episodic in nature. If you are unsure, please contact our [Accessibility Officer](#) who will answer your question in complete confidentiality.)

I am a supervisor/manager

I am an **ally** of persons living with a disability or a concerned employee

2. Do you feel that you can discuss your **disability** and/or the various **barriers** that you experience at work with your current supervisor/manager? (Question for persons living with a disability only)

Yes, I have already discussed with my current supervisor/manager

Yes, although I haven’t discussed this with my current supervisor/manager

No, I do not feel comfortable discussing my disability and/or barriers I experience with my current supervisor/manager

Please specify if you wish:

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3. Are you aware of the existence of the GC Workplace Accessibility Passport for Persons living with a disability? (Question for persons living with a disability only)

- Yes, I am aware and have already completed the Passport and discussed it with my manager
- Yes, I am aware and have already completed the Passport, but I have not discussed it with my manager
- Yes, I am aware but have not used it
- No, I am not aware of the existence of this tool
- Other, please specify:

4. Can you tell us about the **barriers** you experience in your day-to-day work? (Question for persons living with a disability only)

- I have experienced barriers and they are the following:
- I have experienced barriers but do not wish to elaborate
- Not applicable

5. Can you tell us about your observations of the **barriers** experienced by your colleagues in their day-to-day work? (Question for all employees)

- I have observed colleagues experience barriers and they are the following:
- I have observed colleagues experience barriers but do not wish to elaborate
- Not applicable

6. Have you seen or experienced **systemic barriers** at the PPSC? Systemic barriers are policies, procedures, or practices that can negatively affect accessibility and fairness for individuals or groups. They are often put into place unintentionally. (Question for all employees)

- I have experienced systemic barriers and they are the following:
- I have experienced systemic barriers but do not wish to elaborate
- I have observed colleagues experience systemic barriers and they are the following:
- I have observed colleagues experience systemic barriers but do not wish to elaborate
- No

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### *Creating a culture of belonging for employees living with a disability*

7. Have you seen or experienced **attitudinal barriers** at the PPSC? Attitudinal barriers are based on stereotypes or assumptions that limit opportunities or offend the dignity of people living with a disability. (Question for all employees)

- I have experienced attitudinal barriers and they are the following:
- I have experienced attitudinal barriers but do not wish to elaborate
- I have observed colleagues experience attitudinal barriers and they are the following:
- I have observed colleagues experience attitudinal barriers but do not wish to elaborate
- No

8. Can you tell us what is working well at the PPSC in terms of **accessibility and accommodation**? (Question for all employees)

- The following is working well:
- The following has room for improvement:
- I do not know

## Employment

9. Have you experienced **barriers** during a **staffing process** at the PPSC? (Question for persons living with a disability only)

- No
- Yes, please specify:
  - Application process, please specify:
  - Qualifications (education, experience, language requirements), please specify:
  - Assessment (exam, interview, references), please specify:
  - Mobility (location of the position), please specify:
  - Other, please elaborate if you wish:

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### *Creating a culture of belonging for employees living with a disability*

10. Have you experienced **barriers** during your **onboarding** at the PPSC? Onboarding is the process of integrating an employee with a department and its culture, as well as getting the employee the tools and information needed to become a productive member of the team. (Question for persons living with a disability only)

- No
- Yes
- If yes, please elaborate if you wish:

11. Have you experienced **barriers** to **promotion and/or career progression** within the PPSC? (Question for persons living with a disability only)

- No
- Yes
- If yes, please elaborate if you wish:

12. In the past 2 years, have you asked for any type of **accommodation/adjustment**?

Accommodation/adjustments are solutions that address the barriers in the workplace, including adaptive tools, services and/or support measures. Examples include the broad range of mainstream and adaptive products and services that can improve participation of individuals with disabilities such as equipment/tools (ergonomic chair, Braille display, angled writing surfaces and document holders/supports, printer, adjusted lighting), services (CART services or sign language interpretation), support measures (appropriate supports such as signage for allergies, and education for colleagues, written checklists or instructions, flexible work hours, as outlined in the terms and conditions of employment, planning for uninterrupted work time, which could include a quiet space, scheduling time, or working from a remote location). (Question for persons living with a disability only)

- No
- Yes
- If yes, please elaborate if you wish:

13. If you requested an **accommodation/adjustment** in the past 2 years, was your request accepted, denied or is it still ongoing? Accommodation/adjustments are solutions that address the barriers in the workplace, including adaptive tools, services and/or support measures. (Question for persons living with a disability only)

- Accepted
- Denied
- Still ongoing

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I received an accommodation/adjustment, but it was not what I had requested

Please elaborate if you wish:

14. If you requested an **accommodation/adjustment** in the past 2 years, what is your overall satisfaction with how it was handled? Accommodation/adjustments are solutions that address the barriers in the workplace, including adaptive tools, services and/or support measures. (Question for persons living with a disability only)

I am very satisfied

I am somewhat satisfied

I am not at all satisfied

Not applicable

Please elaborate if you wish:

15. Who do you think is your first point of contact for **accommodation/adjustment** requests at the PPSC? (Question for all employees)

My supervisor/manager

Labour Relations / HR

Facilities Management and Accommodations Unit

My union representative

I do not know who my first point of contact is

Other – please specify:

16. Who do you contact when you experience delays or when an **accommodation/adjustment** request is denied? (Question for all employees)

My supervisor/manager

Labor Relations / HR

Facilities Management and Accommodations Unit

My union representative

I do not know who to contact

Other – please specify:

## Public Prosecution Service of Canada – Accessibility Plan 2022

### *Creating a culture of belonging for employees living with a disability*

17. How can the PPSC improve the way that it deals with accessibility and accommodation requests for employees living with a disability? (Question for all employees)

- No improvements are required
- Improvements are needed, but I do not have any specific examples to provide
- Improvements are needed. Please specify:

### Information and Communications Technology

18. What is your level of satisfaction with the ergonomic and/or **adaptive equipment** you have been provided with to do your work? (Question for persons living with a disability only)

- Very satisfied
- Satisfied
- Not very satisfied
- Very unsatisfied
- Not applicable
- Please elaborate if you wish:

19. Do you feel supported by IT specialists when you have questions or concerns regarding the accessible software and technologies that you are currently using at the PPSC? (Question for persons living with a disability only)

- Yes, I am well supported by IT specialists at the PPSC
- No, I do not feel supported but I manage
- No, I do not feel supported and do not know who to turn to
- Not applicable
- Please elaborate if you wish:

20. Are virtual meetings and events fully accessible to you? (Question for all employees)

- Yes. Please elaborate if you wish:
- Partially accessible. Please elaborate if you wish:
- No. Please elaborate if you wish:

## Public Prosecution Service of Canada – Accessibility Plan 2022

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21. Would you benefit from training in making documents more accessible? There are a few straightforward ways to make documents significantly more accessible to people with disabilities, including those with visual impairments, learning disabilities and intellectual disabilities. (Question for all employees)

- Yes
- No
- I do not know
- Please elaborate if you wish:

22. Do you feel that PPSC communications are written in **plain language**? Plain language is a writing technique of organizing information in ways that make sense to the reader. It uses straightforward, concrete, familiar words. Plain language helps the writer adapt what they have to say to the reading abilities of the people who are most likely to read the document. (Question for all employees)

- Yes
- No
- Sometimes
- I do not know
- Please elaborate if you wish:

23. How often do you consciously use **plain language** in your written communications? Plain language is a writing technique of organizing information in ways that make sense to the reader. It uses straightforward, concrete, familiar words. Plain language helps the writer adapt what they have to say to the reading abilities of the people who are most likely to read the document. (Question for all employees)

- Always
- Sometimes
- Never
- I do not know
- Please elaborate if you wish:

## Built Environment



## Public Prosecution Service of Canada – Accessibility Plan 2022

### *Creating a culture of belonging for employees living with a disability*

24. How would you rate the accessibility of your current office building based on your own needs?  
(Question for persons living with a disability only)

- Not accessible
- Somewhat accessible
- Very accessible
- Completely accessible – I do not encounter any issues
- Not applicable
- Please elaborate if you wish:

25. How would you rate the accessibility of your current office building in general? (Question for all employees)

- Not accessible
- Somewhat accessible
- Very accessible
- Completely accessible – I do not encounter any issues
- Not applicable
- Please elaborate if you wish:

26. Who do you contact to report a problem with the accessibility of a building at the PPSC? (Question for all employees)

- My supervisor/manager
- My Regional Office Manager / Business Coordinator
- The National Service Call Centre (NSCC)
- The Facilities Management and Accommodations Unit
- I do not know who to contact

27. Are you aware of the accessibility features and services available at the PPSC for your own needs?  
(Question for employees living with a disability)

- Yes, I am well aware of all accessibility features and services at my disposal in my unit/region
- I am somewhat aware of accessibility features and services at my disposal in my unit/region

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I am not aware of accessibility features and services at my disposal in my unit/region

Please elaborate if you wish:

28. Are you aware of the accessibility features and services available at the PPSC? (Question for all employees)

Yes, I am well aware of all accessibility features and services available in my unit/region

I am somewhat aware of accessibility features and services available in my unit/region

I am not aware of accessibility features and services available in my unit/region

Please elaborate if you wish:

29. Are in-person meetings and events fully accessible to you? (Question for all employees)

Yes. Please elaborate if you wish:

Partially accessible. Please elaborate if you wish:

No. Please elaborate if you wish:

30. Are you aware of your building's current emergency evacuation plan? (Question for all employees)

Yes, I am

Yes, and I have some concerns:

No, I am not

Please elaborate if you wish:

31. What is your preference for onsite work post-pandemic? (Question for persons living with a disability only)

I would prefer to work from home 100% of the time

I would prefer to work from home the majority of the time, with exceptions for conferences or special meetings

I would prefer to work from home, coming onsite from time to time (1 or 2 days per week, depending on the week)

I would prefer to work 50% of my time from home and 50% onsite

I would prefer to work the majority of my time onsite with the option to work 1 or 2 days per week from home, depending on the week

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I would prefer to have some flexibility to my schedule as needed. Please elaborate if you wish:

I would prefer to work 100% of the time onsite

## Culture Change, Education and Awareness

32. What should the PPSC do to improve the knowledge, awareness, and confidence of **employees** on workplace accessibility? You may pick one or more answers. (Question for all employees)

- Specialized learning events
- Mandatory training
- Learning resources
- Information posted on the iNet
- Information in the PPSC Insider
- Other, please elaborate:
- Nothing is required

33. What should the PPSC do to improve the knowledge, awareness, and confidence of **supervisors and/or managers** on workplace accessibility? You may pick one or more answers. (Question for all employees)

- Specialized learning events
- Mandatory training
- Learning resources
- Information posted on the iNet
- Information in the PPSC Insider
- Other, please elaborate:
- Nothing is required

## Tell us a little bit more about yourself

## Public Prosecution Service of Canada – Accessibility Plan 2022

### *Creating a culture of belonging for employees living with a disability*

34. If you are a person living with a disability, please provide further details. Select the boxes that apply to you. (Question for persons living with a disability only)

A seeing disability

*A seeing disability affects vision, including total blindness, partial sight, and visual distortion.*

A hearing disability

*A hearing disability affects ability to hear, including being hard of hearing, deafness, or acoustic distortion.*

A speech disability

*A speech disability affects ability to talk, including total speech loss, partial speech, and speech distortion.*

A mobility disability

*A mobility disability affects ability to move your body, including the required use of a wheelchair or a cane, or other issues impacting your mobility.*

Challenges with flexibility or dexterity

*Challenges with flexibility or dexterity affects ability to move joints or perform motor tasks, especially with your hands.*

A mental health disability

*A mental health disability affects psychology or behaviour, such as anxiety, depression or social / compulsive disorder or phobia or psychiatric illness.*

A sensory or environmental disability

*A sensory or environmental disability affects sensitivity to light, sounds or other distractions, as well as allergens and other environmental sensitivities.*

A chronic health condition or pain

*A chronic health condition or pain affects ability to function on a regular or episodic basis due to migraines, Crohn's disease, colitis, fibromyalgia, multiple sclerosis, and other disabilities or health conditions.*

A cognitive disability

*A cognitive disability affects ability to carry out tasks involving executive functioning, such as planning and organization, learning information, communication, and memory, including autism spectrum disorder, attention deficit hyperactivity disorder, and learning disabilities*

An intellectual disability

*An intellectual disability affects ability to learn and to adapt behaviour to different situations.*

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Another disability (Optional to specify):

Prefer not to specify

35. If you are a person living with a disability, have you self-identified in PeopleSoft? (Question for persons living with a disability only)

Yes

No

If your answer is 'no', would you please specify why you haven't done so?

## Demographics

The following questions are an important part of the survey. We encourage you to complete these questions.

We guarantee that this information will be kept completely confidential. Results from this survey will not be reported in subgroups of fewer than 10 responses for any specific demographic. Responses from smaller groups will be combined with another group to protect the anonymity of respondents.

Thank you for completing these questions.

36. What is your current employment status? (Question for all employees)

Indeterminate (permanent)

Term

Casual

Student

Other

37. In which location is your current position located? (Question for all employees)

Yukon

Northwest Territories

Nunavut

British Columbia

Alberta

Saskatchewan

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- Manitoba
- National Capital Region
- National Headquarters
- Ontario (excluding National Capital Region and National Headquarters)
- Quebec (excluding National Capital Region)
- New Brunswick
- Nova Scotia
- Newfoundland and Labrador

38. If you would like to be contacted to provide further comments and assist in the design of the PPSC's Accessibility Plan, please let us know. Our Accessibility and Disability Champion will get in touch with you. Your comments will remain confidential. (Question for persons living with a disability only)

- Yes, I would like to be contacted. Please provide your name as well as the manner in which you would like to be reached (email, telephone, text message or other):
- Yes, I would like to be contacted. However, my current workload would not enable me to participate in further consultations at the moment. Please provide your name, the manner in which you would like to be reached (email, telephone, text message or other) and your availabilities.
- No, I do not wish to be contacted at this point, but I realize that I have the opportunity to contact the Advancement Centre for EDIA at any time should I change my mind.

## ANNEX C – COMPILATION OF DATA FROM THE NATIONAL ACCESSIBILITY SURVEY

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OCTOBER 2022

*Public Prosecution Service of  
Canada*

*National Accessibility Plan*

*Data Compilation from  
Consultations with PwD*

*Prepared by:*

*The National Council of Employees for  
Persons Living with a Disability*

# Public Prosecution Service of Canada – Accessibility Plan 2022

## *Creating a culture of belonging for employees living with a disability*

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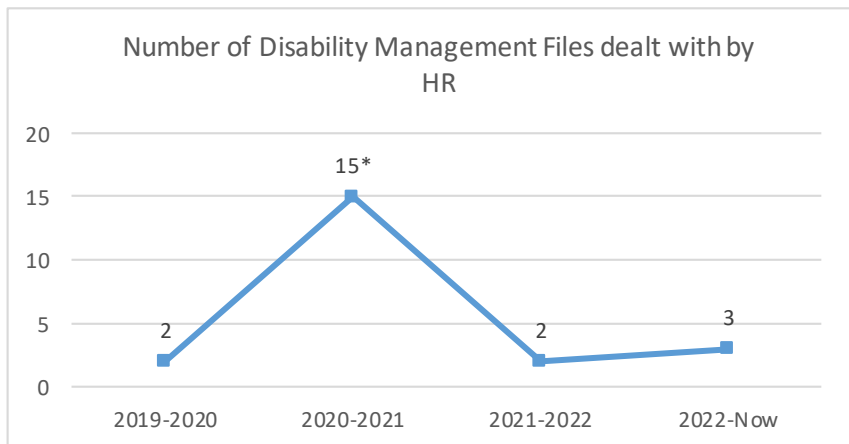


### Employment Pillar

#### Preface

It is important to draw attention to the fact that in June of 2021, out of a total workforce of 1,197 employees, 59 employees had self-identified in PeopleSoft as living with a disability. In June of 2022, that number increased to 75 employees, up by 16. The results of our First National Accessibility Survey revealed that we currently have 134 employees living with a disability in our department, which suggests that 11.20% of our employees are currently living with a disability. At the present time, only 56% of our employees living with a disability are comfortable self-identifying.

On September 20<sup>th</sup>, 2022, Labour Relations provided us with the following data regarding the number of disability management files dealt with by their department:



\* Number of Disability Management Files dealt with by HR. 2019-2020: 2, 2020-2021: 15, 2021-2022: 2, 2022 up to now: 3. The increase in 2020 is mostly due to requests related to telework brought on by the pandemic

#### Accessibility, Accommodation and Individualized Adjustments

##### Survey Questions

###### Question:

In the past 2 years, have you asked for any type of accommodation/adjustment? (Question for PwD only)

Answer Choices	Percentage	Responses
Yes	45.71%	48
No	54.29%	57
Totals	100%	105

###### Feedback:

# Public Prosecution Service of Canada – Accessibility Plan 2022

## Creating a culture of belonging for employees living with a disability

**Note: The number in parenthesis indicates the amount of employees making that same comment.**

- Extra time on language test (3).
- Use of high contrast schemes for color-coded documents.
- Staffing processes.
- Accommodation through return to work after surgery (2).
- Equipment to assist in performing duties (6) and ergonomic assessment (7).
- An ergonomic assessment was done but equipment has not been provided as of yet (2).
- Repeat things and briefly remove masks at times to allow for lip-reading.
- Compressed workweek.
- Carrying items to and from court.
- Access to time off for ongoing medical treatment without having to use sick leave.
- Difficult to accommodate an anxiety disorder in our legal environment (2).
- Flexible hours (4).
- Nature of work - out of court vs in court (physically) (2).
- Extra time to complete tasks or modified workload (3).
- Ability to work remotely (5).

### Question:

If you requested an accommodation/adjustment in the past 2 years, was your request accepted, denied or is it still ongoing? (Question for PwD only)

Answer Choices	Percentage	Responses
Accepted	69.39%	34
Denied	4.08%	2
Still ongoing	22.45%	11
I received an accommodation/adjustment, but it was not what I had requested	4.08%	2
Totals	100%	49

### Employee Feedback:

- Employee feels that the requests will probably be held against them.
- Managers forget to apply requested adjustment (3).
- Still waiting for adjustments to be implemented (3).
- Received smaller requests, but still waiting for larger, more expensive items as per ergonomic assessment.
- Manager agreed for employee to work from home due to mobility issues. Manager made sure that help was provided when work at the office was required.
- Workload adjustment ongoing.
- Request to telework for support staff has been granted because of COVID.

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### *Creating a culture of belonging for employees living with a disability*

#### Question:

If you requested an accommodation/adjustment in the past 2 years, what is your overall satisfaction with how it was handled? (Question for PwD only)

Answer Choices	Percentage	Responses
I am very satisfied	48.00%	24
I am somewhat satisfied	28.00%	14
I am not at all satisfied	16.00%	8
Not applicable	8.00%	4
Totals	100%	50

#### Feedback:

- Having to remind colleagues all the time is a burden.
- Still awaiting an assessment and potential accommodation.
- Doctor suggested a speech to text software but request hasn't been made because of cost.
- Long approval process for a accommodation related to language tests. Employee even considered not using the accommodation.
- Employees feel like they are asking a favor when they ask for an accommodation.
- Extremely satisfied (2). Manager is very understanding and shows interest.

#### Question:

Who do you think is your first point of contact for accommodation/adjustment requests at the PPSC?

Answer Choices	All Employees		PwD Employees	
	Percentage	Responses	Percentage	Responses
My supervisor/manager	82.35%	224	81.13%	86
Labour Relations / HR	2.57%	7	1.89%	2
Facilities Management and Accommodations Unit	2.21%	6	0.94%	1
My union representative	1.84%	5	2.83%	3
I do not know who my first point of contact is	9.56%	26	12.26%	13
Other (please specify)	1.47%	4	0.94%	1
Totals	100%	272	100%	106

## Public Prosecution Service of Canada – Accessibility Plan 2022

### Creating a culture of belonging for employees living with a disability

#### Question:

Who do you contact when you experience delays or when an accommodation/adjustment request is denied? (Question asked to all employees)

Answer Choices	All Employees		PwD Employees	
	Percentage	Responses	Percentage	Responses
My supervisor/manager	39.11%	106	37.14%	39
Labour Relations / HR	10.33%	28	9.52%	10
Facilities Management and Accommodations Unit	4.80%	13	2.86%	3
My union representative	9.23%	25	9.52%	10
I do not know who my first point of contact is	30.63%	83	32.38%	34
Other (please specify)	5.90%	16	8.57%	9
Totals	100%	271	100%	105

#### Question:

Can you tell us what is working well at the PPSC in terms of accessibility and accommodation? (Question asked to all employees)

Answer Choices	All Employees		PwD Employees	
	Percentage	Responses	Percentage	Responses
I don't know	53.27%	155	53.27%	57
The following is working well	46.73%	118	46.73%	50
Totals	100%	273	100%	107

#### The following is working well:

- Office equipment and tools, including adaptive technology when required (13).
- iPhones are highly compatible with assistive hearing technology.
- AAACT.
- Privacy is respected.
- Washroom facilities.
- Leave policies.
- Supportive management (16).
- The attitudes are changing (11). It feels like managers are more receptive to the possibility of accommodating, whereas before requests were dismissed as being too costly or unnecessary.
- The awareness and education is increasing (4).
- Ergonomic equipment (36).
- New office space is fully accessible.
- Extra time during HR processes.
- Working from home / remote work (27).

## Public Prosecution Service of Canada – Accessibility Plan 2022

### Creating a culture of belonging for employees living with a disability

- Flexible work arrangements (30).
- The adoption of MS Teams.
- Signage for allergies / scent (8).
- The GC Accessibility Passport (3).
- Supervisor gave employee choice as to their work building.
- Quiet space in the office and/or planning for uninterrupted work time (2).
- Accommodation team is very good and are always ready to help and answer questions.
- New investment in the ACEDIA with an advisor dedicated to accessibility (5).
- Sign language in meetings (2).

#### Question:

Can you tell us what has room for improvement at the PPSC in terms of accessibility and accommodation? (Question asked to all employees)

Answer Choices	All Employees		PwD Employees	
	Percentage	Responses	Percentage	Responses
I don't know	59.78%	162	48.11%	51
The following has room for improvement	40.22%	109	51.89%	55
Totals	100%	271	100%	106

#### Question:

How can the PPSC improve the way that it deals with accessibility and accommodation requests for employees living with a disability? (Question asked to all employees)

Answer Choices	All Employees		PwD Employees	
	Percentage	Responses	Percentage	Responses
No improvements are required	17.67%	47	11.76%	12
Improvements are needed, but I do not have any specific examples to provide	55.64%	148	58.82%	60
Improvements are needed (please specify)	26.69%	71	29.41%	30
Totals	100%	266	100%	102

#### Themes

##### Improvements needed

- Suggestion as to the creation of a new PPSC Accommodation email inbox or central neutral and confidential portal (25) where employees can send their requests.

# Public Prosecution Service of Canada – Accessibility Plan 2022

## *Creating a culture of belonging for employees living with a disability*

- Accommodation requests should be dealt with by a specialist who knows how to deal with persons with a disability and not directly with the supervisor (2). This person should be empathetic, provide solutions, and facilitate discussions with the supervisor. The process should be as easy as possible for both the employee and the supervisor. The process should not be adversarial. It should be a conversation. The service should be tailored to each employee (2). The service should be responsible for the request from beginning to end and should make sure to follow-up on a regular basis as accommodation needs might change over time.
- A more timely and effective accommodation process (22).
- Employees have a level of fear and discomfort in raising barriers seeing that the Duty to Accommodate file is currently being managed by Labour Relations team (sends a wrong message to PwD) (4).
- Mention in the letter of offer that if a new employee does not feel comfortable discussing the accommodation with their managers for fear of this affecting their relationship, they can contact a third party (4).
- Building trust, making sure employees with a disability want to stay at the PPSC.
- More clarity about who the appropriate contact person is, and what employees might expect in terms of a timeline of response for the enactment of the accommodation (10).
- Additional awareness and education about disabilities (12).
- Willingness to accommodate, with flexibility and creativity, without necessarily having to provide medical information (14).
- Additional resources/funding for accommodation. Employees should not feel bad in making their requests (3).
- There is a departmental attitude that any accommodation is a "special favor" and can be withheld or cancelled at any time (3).
- PPSC needs to lean into the idea of "no wrong door" and "yes by default" (7) approach.
- Non-unionized employees do not have anyone to help them through the process.
- Additional specialized equipment.
- Office spaces need to be more accessible (2).

### *Additional support to supervisors and managers*

- Lack of knowledge from managers, supervisors, and employees about options available to reduce barriers. Education and awareness for team leaders on how to better support employees (21).
- Reduce the heaviness felt by employees who request accommodation. When staff are brave enough to come forward, managers should accept it in good faith and not question the request (3).
- Supervisors treating all employees in the same manner, not considering that all disabilities are different and some require additional tools and support to excel at their jobs (3).
- Difficult to find a manager to trust in order to get the accommodation in place (3).
- Less reliance on team leaders who are overburdened (5).
- Place people into management positions that can empathize with employees (3).

### *Modernizing our operations, culture and policies*

- Providing American Sign Language (ASL), Quebec Sign Language (QSL), Indigenous Sign Languages (ISL) interpreters at all meetings for employees with hearing impairments.
- Better balance of the accommodation versus the need to fulfill our mandate.
- The PPSC must be more proactive in creating an accessible and healthy workplace for persons of all abilities (8).
- The stigma, either real or perceived, that goes along with an accommodation (3).

## Public Prosecution Service of Canada – Accessibility Plan 2022

### Creating a culture of belonging for employees living with a disability

- Change the mindset of accommodation being a departmental burden (2).
- Accommodation of mental health issues done inconsistently and without empathy (3).
- Ergonomic assessments at home and at the office that are not followed through (2).
- Additional flexibility for employees who have routine medical appointments.
- Integrate accessibility information onto onboarding sessions.
- Neurodivergent employees would benefit from having marginal tasks removed from their job descriptions.

#### Staffing

##### Question:

Have you experienced barriers during a staffing process at the PPSC? Check all that apply. (Question for PwD only)

Answer Choices	Percentage	Employees
No	58.68%	71
Yes, with the application	8.26%	10
Yes, with qualification	9.92%	12
Yes, with assessments	9.92%	12
Yes, with mobility	5.79%	7
Other, please elaborate	7.43%	9
Totals	100%	121

\* A total of **50 PwD** (41.32%) have answered **YES** to this question.

##### Question:

Have you experienced barriers during your onboarding at the PPSC? (Question for PwD only)

Answer Choices	Percentage	Employees
Yes	20.95%	22
No	79.05%	83
Totals	100%	105

##### Question:

Have you experienced barriers to promotion/career progression at the PPSC? (Question for PwD only)

Answer Choices	Percentage	Employees
Yes	34.29%	36
No	65.71%	69
Totals	100%	105

# Public Prosecution Service of Canada – Accessibility Plan 2022

## *Creating a culture of belonging for employees living with a disability*

\*\*\*There is also a meaningful quantity of employees who have not disclosed their disabilities to anyone at work, including their supervisors, for different reasons such as:

- Employees report seeing negative bias towards staff identified as having a disability.
- Employees report that it feels safer not to disclose a disability, unless it is absolutely required.
- There is a perception that requesting an accommodation will be seen as a burden.
- Employees feel that they will be resented for asking for an accommodation.
- Reporting a disability is seen as an impediment for a person to be considered for a promotion.

### Barriers mentioned by employees

- Managers involved in staffing processes fail to demonstrate flexibility when assessing candidates with disabilities.
- The PPSC does not conduct target hiring.
- Several employees report being excluded from a competition for reasons directly related to their disability. Revision boards fail to provide clear and timely reasons of their decisions.
- The PPSC should take measures to ensure that assessors in staffing processes are conscious of their biases.
- Employees report that managers shows signs of stereotyping employees living with a disability.
- Employees report that managers show a lack of knowledge on how to support employees with disabilities or seem to favor one-size-fits-all solutions without flexibility.
- Employees are expected to go the extra mile to prove they have a disability in order to receive accommodation, enforcing the idea that their condition is a burden to the department.
- Certain accommodation have been denied even when medical documentation was provided.
- Managers disregard the medical limitations of their employees because of operational requirements.
- Neurodivergent employees are not recognized for their strengths.
- Managers assume all their staff can learn in a fast, self-taught manner.
- Employees who exhibit signs of anxiousness, nervousness, or sadness are perceived as mentally fragile and treated as less valuable.
- Poorly designed physical environment slows or prevents the completion of tasks for people with mobility issues.
- Employees living with invisible disabilities (such as cognitive impairments) are facing additional challenges during the interview phase of staffing processes; answers may differ from expected answers while still being acceptable, and as a result these employees get screened out.
- Perception that promotions for LPs are only for those with the ability to prosecute complex and lengthy trials.
- Employees report having experienced unequal opportunities to work on projects or tasks that demonstrate knowledge, skills, and abilities.
- Employees report being stereotyped and perceived as good for certain tasks only.
- Disabilities affected by stress face compounded barriers to succeed in second language testing.
- In staffing processes with online questionnaires for pre-screening, the volume of questions is a barrier for candidates with cognitive challenges.
- Some employees living with disabilities see favoritism towards their able-bodied colleagues.



# Public Prosecution Service of Canada – Accessibility Plan 2022

## Creating a culture of belonging for employees living with a disability

### Suggestions shared by employees

- Supporting employees living with a disability sometimes means taking care of other issues. For example, in regions with understaffing issues, some PwD might feel additional pressure to perform beyond what would normally be required.
- Staff needs education on the challenges experienced by employees living with disabilities in order to change attitudes and facilitate their integration. Mandatory training should be prioritized.
- Perception that employees seeking accommodation are going to be treated as “difficult employees”.
- Perception that promotions into management positions are for persons considered “normal” and able-bodied.
- Perception that some managers lack any will to try to make the required changes necessary to improve on employment equity.
- Most onboarding training is provided in written format. Alternative training material, such as training videos would be helpful. Furthermore, a great number of employees report a lack of onboarding.

## The Built Environment Pillar

### Survey Questions

#### Question:

How would you rate the accessibility of your current office building based on your own needs? (Question for PwD only)

Answer Choices	Percentage	Employees
Not applicable	10.48%	11
Not accessible	4.76%	5
Somewhat accessible	25.71%	27
Very accessible	33.34%	35
Completely accessible – I do not encounter any issues	25.71%	27
Totals	100%	105

#### Question:

How would you rate the accessibility of your current office building in general? (Question asked to all employees)

Answer Choices	Percentage	Employees
Not applicable	11.24%	30
Not accessible	6.36%	17
Somewhat accessible	33.33%	89
Very accessible	30.34%	81
Completely accessible – I do not encounter any issues	18.73%	50
Totals	100%	267

## Public Prosecution Service of Canada – Accessibility Plan 2022

### Creating a culture of belonging for employees living with a disability

#### Question:

Who do you contact to report a problem with the accessibility of a building at the PPSC?

Answer Choices	All Employees		PwD Employees	
	Percentage	Responses	Percentage	Responses
My supervisor/manager	41.57%	111	39.05%	41
My regional office manager/business manager	13.86%	37	8.57%	9
National Service Call Centre (NSCC)	8.61%	23	10.48%	11
The Facilities Management and Accommodations Unit	8.99%	24	8.57%	9
I do not know who to contact	26.97%	72	33.33%	35
Totals	100%	267	100%	105

#### Question:

Are you aware of the accessibility features and services available at the PPSC for your own needs? (Question for PwD only)

Answer Choices	Percentage	Employees
Yes, I am well aware of all accessibility features and services available	12.50%	13
I am somewhat aware of all accessibility features available	37.50%	39
I am not aware of accessibility features available	50.00%	52
Totals	100%	104

#### Question:

Are you aware of the accessibility features and services available at the PPSC?

Answer Choices	All Employees		PwD Employees	
	Percentage	Responses	Percentage	Responses
Yes, I am well aware of all accessibility features and services available	6.37%	17	8.57%	9
I am somewhat aware of all accessibility features available	42.40%	113	42.86%	45
I am not aware of accessibility features available	51.23%	137	48.57%	51
Totals	100%	267	100%	105

## Public Prosecution Service of Canada – Accessibility Plan 2022

### Creating a culture of belonging for employees living with a disability

#### Question:

Are in-person meetings and events fully accessible to you?

Answer Choices	All Employees		PwD Employees	
	Percentage	Responses	Percentage	Responses
Yes	81.88%	217	80.95%	85
Partially accessible	13.21%	35	17.15%	18
No	4.91%	13	1.90%	2
Totals	100%	265	100%	105

#### Question:

Are you aware of your building's current emergency evacuation plan?

Answer Choices	All Employees		PwD Employees	
	Percentage	Responses	Percentage	Responses
Yes	54.10%	144	51.92%	54
Partially accessible	7.50%	20	8.65%	9
No	38.40%	102	39.42%	41
Totals	100%	266	100%	104

#### Question:

What is your preference for onsite work post-pandemic? (Question for PwD only)

Answer Choices	Percentage	Employees
Work from home (WFH) 100%	18.09%	19
WFH majority of the time, exceptions for conferences, etc.	22.86%	24
WFH, but with the option to come to the office 1-2 days a week	34.28%	36
WFH 50%, in office 50%	5.71%	6
In office, with the option to WFH 1-2 days a week	8.57%	9
I would like flexibility to schedule my time as needed	7.62%	8
In office 100%	2.86%	3
Totals	100%	105

#### Key findings

- Only 25% of employees with disabilities find their workplace completely accessible.

# Public Prosecution Service of Canada – Accessibility Plan 2022

## *Creating a culture of belonging for employees living with a disability*

- 27% of all employees do not know who to contact to report a problem with the accessibility of a building at the PPSC.
- 33% of PwD employees do not know who to contact to report a problem with the accessibility of a building at the PPSC.
- 50% of employees with disabilities do not know about accessibility features and services available at the PPSC.
- Approximately 20% of employees found in person meetings and events were not accessible or only partially accessible.
- Approximately 50% of all employees don't know their building's evacuation plan, or they do know it but have concerns about it.
- The vast majority of employees with disabilities would prefer to work from home the majority of the time.

### Barriers mentioned by employees

- Work space accessibility barriers for mobility issues:
  - “Help” buttons to call for assistance instead of having motorized doors or braille signs stigmatizes PwD by removing their ability to independently access areas of their workplace.
  - Not all areas are wheelchair accessible, including entry points, washrooms, and narrow hallways with twists and turns, or multiple hallway doors in close proximity.
  - Having essential areas of the workplace on different floors causes barriers for people with mobility issues.
  - Locked bathrooms.
  - Door handles that are knobs instead of levers.
  - Single accessible washrooms are often preferred for use by able-bodied people and not available for employees with mobility issues.
  - Minimal, or lack of automatic door openers.
  - Office space may be accessible, but courthouses where counsel and paralegals also go to work, may not be.
  - Unreliable equipment such as elevators or automatic doors that fail regularly.
  - Car parking and bike parking areas may not be accessible.
- Work space accessibility barriers for sensory issues:
  - Lack of quiet space to work.
  - The open concept of cubicles – distractions and sound.
  - Harsh lighting.
  - Lack of accommodation for employees with a vision impairment.

### Lack of awareness of disability resources

- There is no standard process during onboarding, or on an ongoing basis, to make people aware of disability resources.
- People who are aware of the resources only know about those related to their disability.
- There is no easy to access repository of disability resources.

# Public Prosecution Service of Canada – Accessibility Plan 2022

## Creating a culture of belonging for employees living with a disability

- Due to the stigma surrounding PwD, some employees do not disclose their disability and therefore do not receive accommodation they would benefit from.

### In-person meeting accessibility barriers

- Attendance at in-person meetings can be affected by both chronic pain and fragrance allergies.
- Employees should be encouraged to use a microphone with their headphones.

### Lack of awareness of emergency evacuation plans

- Employees are not aware of their building's evacuation plan. It is not in their onboarding documents, and is not posted in the building, or circulated by email.
- There are infrequent, or no drills to practice for fires, or active shooter situations.
- There are also concerns about the plans, such as gathering points that do not seem safe.
- PwD are not accommodated in evacuation plans. Employees with mobility issues cannot use elevators or stairs, and there is no clear plan for them.
- When there are reduced numbers of people in the workplace, fire wardens may not be at work. There may be no one available to assist PwD.

### Accessibility issues and initiatives

- Working from home can remove many barriers for employees living with disabilities as they may have the freedom to create a workspace that is the most accessible for them.
- Accessibility audits of facilities needed to identify barriers and recommend corrective actions.
- Accommodation of PwD is addressed individually. There is a need to more systematically support accessibility in the workplace as a whole.
- Increased awareness of the needs of persons with visual, auditory, sensory and other limitations.

## Information and Communication Technologies (ICT) Pillar

### Survey Questions

#### Question:

What is your level of satisfaction with the ergonomic and/or adaptive equipment you have been provided with to do your work? (Question for PwD only)

Answer Choices	Percentage	Employees
Not applicable	33.96%	36
Very satisfied	18.87%	20
Satisfied	30.19%	32

## Public Prosecution Service of Canada – Accessibility Plan 2022

### Creating a culture of belonging for employees living with a disability

Not very satisfied	12.26%	13
Very unsatisfied	4.72%	5
Totals	100%	106

#### Question:

Do you feel supported by IT specialists when you have questions or concerns regarding the accessible software and technologies that you are currently using at the PPSC? (Question for PwD only)

Answer Choices	Percentage	Employees
Yes, I am well supported by IT specialists at the PPSC	39.05%	41
No, I do not feel supported but I manage	14.29%	15
No, I do not feel supported and do not know who to turn to	5.71%	6
Not applicable	40.95%	43
Totals	100%	105

#### Feedback:

- Received terrific support from IT.
- IT specialists are limited.
- Employees feel supported by AACT, not so much by IT specialists at the PPSC.
- It is sometimes long to have anything IT related implemented due to red tape or IT specialists' workloads.
- Service through our Help-Desk is somewhat long, taking on average a few days before getting a response, and the problem is usually not fixed immediately.
- Support seems to be lacking for new employees.
- Service needs to be more proactive and responsive when specific needs arise.
- When IT specialists are on site, they are usually very knowledgeable. However, departments share them with other locations.

#### Question:

Are virtual meetings and events fully accessible to you? (Question asked to all employees)

Answer Choices	All Employees		PwD Employees	
	Percentage	Employees	Percentage	Employees
Yes	91.08%	245	88.57%	93
Partially accessible	8.55%	23	10.48%	11
No	0.37%	1	0.95%	1
Totals	100%	269	100%	105

#### Feedback:

- It is easier when only the speaker is unmuted and on screen.

## Public Prosecution Service of Canada – Accessibility Plan 2022

### *Creating a culture of belonging for employees living with a disability*

- Difficult not to get distracted with all the emoji and chats popping on the screen.
- For those who cannot stay long hours on computer, recording meetings and being able to watch them later would be helpful.
- Use of platforms that allow for closed-captions, such as MS Teams.

#### Barriers mentioned by employees

- There is a lack of awareness of services and possible accommodation available.
- Office policies are not well circulated to employees.
- Employees do not know who to turn to for advice and guidance, especially those who are not unionized.
- Delays or slowness in processing requests for accommodations and obtaining required adaptive equipment.
- Some managers push back and request medical information in order to process a request for an accommodation.
- Some requests have been turned down due to limited budget.
- National meetings are not recorded and they do not always provide captions in English and French.
- For some, headphones were not provided with their cell phone.
- Not everyone is aware that Foxit PDF has a function to check accessibility and make forms easier for read-aloud technology.
- There are some issues using the tablets and Braille displays.
- Some ergonomic assessments have been on hold because of the pandemic.

#### Suggestions shared by employees

- When creating reports or posters in color, check contrast to help employee with a visual impairment.
- Provision of desks with keyboard trays and sit/stand workstations.
- Providing ASL/QSL/ISL interpreters at all staff meetings for employees with hearing impairments.
- Finding a way to inform the employees at the beginning of the employment about available services.
- Ensuring that employees receive accommodation with minimal delay.
- Setting up all workstations with basic common accommodation, such as noise cancelling headphones.
- Better follow-up from management for the accommodation requests.
- Improve budget for the implementation of larger/more costly accommodations.
- Remove the mindset of accommodation being a departmental burden.
- Being creative and understanding.
- Alternative training material, such as training videos. Most onboarding training are in written format.

## Communication, Other than Information and Communication Technologies (ICT) Pillar

### Survey Questions

#### Question:

Would you benefit from training in making documents more accessible? There are a few straightforward ways to make documents significantly more accessible to people with disabilities, including those with visual impairments, learning disabilities and intellectual disabilities. (Question asked to all employees)

## Public Prosecution Service of Canada – Accessibility Plan 2022

### *Creating a culture of belonging for employees living with a disability*

Answer Choices	Percentage	Employees
Yes	52.79%	142
No	23.42%	63
I don't know	23.79%	64
Totals	Total	269

#### Question:

Would you benefit from training in making documents more accessible? (Question asked to managers and allies)

Answer Choices	Percentage	Employees
Yes	57.93%	95
No	18.90%	31
I don't know	23.17%	38
Totals	100%	164

#### Question

Do you feel that PPSC communications are written in plain language? Plain language is a writing technique of organizing information in ways that make sense to the reader. It uses straightforward, concrete, familiar words. Plain language helps the writer adapt what they have to say to the reading abilities of the people who are most likely to read the document. (Question asked to all employees)

Answer Choices	Percentage	Employees
Yes	55.94%	151
No	4.81%	13
Sometimes	35.55%	96
I don't know	3.70%	10
Totals	100%	270

#### Question:

Do you feel that PPSC communications are written in plain language? (Question asked to managers and allies)

Answer Choices	Percentage	Employees
Yes	54.88%	90
No	5.49%	9
Sometimes	37.20%	61
I don't know	2.43%	4
Totals	100%	164

#### Question:

How often do you consciously use plain language in your written communications? (Question asked to all employees)

Answer Choices	Percentage	Employees
Always	63.57%	171



## Public Prosecution Service of Canada – Accessibility Plan 2022

### Creating a culture of belonging for employees living with a disability

Sometimes	31.97%	86
Never	0.74%	2
I don't know	3.72%	10
Totals	100%	269

#### Question:

How often do you consciously use plain language in your written communications? (Question asked to managers and allies)

Answer Choices	Percentage	Employees
Always	59.14%	97
Sometimes	37.81%	62
Never	0.61%	1
I don't know	2.44%	4
Totals	100%	164

### Barriers to communication mentioned by employees

#### Mental health

- Some employees complain about the PPSC's custom of sending communications at any hour of the day/night. This affects the ability of employees to have a proper work-life balance, which negatively impacts employees with disabilities affected by stress.

#### Hearing Impairments

- Some of our employees are hearing impaired. Their capacity to retain information shared is hindered when only oral communication is used.
- Plexiglas barriers in courtrooms prevents sound from carrying and disrupts the proper functioning of hearing aids.
- Employees report having inadequate support from colleagues with regards to hearing impairments: colleagues showing lack of care in speaking in a clear manner, repeat what was said, removing masks for lip reading.

#### Speech impairments

- Employees with speech impairments report being excluded during conversations in general, giving them an unfair disadvantage in their development.
- During staffing processes, employees report that managers disqualify them during the interview phase on the grounds that they are 'unable to communicate clearly'.

#### Cognitive Impairments

- Employees with cognitive disabilities may process information at a different pace, or best learn new material through alternative mediums. However, there are usually few options to learn. It usually involves either an oral presentation or a self-paced online training.

## Public Prosecution Service of Canada – Accessibility Plan 2022

### *Creating a culture of belonging for employees living with a disability*

- There is a lack of support from online meeting organizers to minimize distracting actions such as the use of emoji's and chats popping on the screen, which can distract to the point that information is poorly retained. (The technical support to alleviate the effects of the use of emoji's and chat is going to be addressed under the ICT Pillar).

#### Vision Impairments

- Employees are not aware that Foxit PDF has a function to check accessibility and make forms easier for read-aloud technology.
- Videos are not always recorded with captions (in both English and French).
- Some employees have difficulty reading material due to poor choice in color-coding scheme.
- Freewares sometimes lack close caption options, like Zoom.
- Some signature blocs are hard to read for persons with vision or cognitive impairments.

#### Suggestions shared by employees

- PPSC should implement a formal policy of not sending corporate emails outside of working hours.
- Providing information well enough in advance of meetings to allow persons with challenges relating to processing the time required to properly review prior to discussions.
- Employees should receive training to better understand iPhone hearing assistive technologies.
- Managers should ensure only the speaker is unmuted and on screen in online meetings, to ensure there is minimal interference for employees with cognitive disabilities.
- PPSC should provide ASL/QSL interpreters at all staffs meetings for employees with hearing impairments.
- Providing different ways to disseminate information and training (such as in written format) would allow for better retention of information for employees with cognitive impairments.
- Most onboarding training is provided in written format. Alternative training material, such as training videos, would be helpful.
- IT could provide information on how employees can remove noise and notifications from Emoji's and chats popping on the screen during online meetings.
- Provide training and expect employees to use Foxit PDF's function to assess accessibility performance of forms to make them easier to those using read-aloud technologies.
- Records videos and use captions (in both French and English).
- Standardization of color-coding schemes - high contrast schemes would be helpful.
- Provide training about simple adaptive technologies that are available and should become mainstream, like assistive writing aids. Create comprehensive, easy to access lists for ease of access.
- The PPSC to adopt a standardized accessible signature bloc (friendly to vision and cognitive impairments).

## The Procurement of Goods, Services and Facilities Pillar

### Survey for our NCE PwD only

**Question:** Have you or someone you know ever experienced a accessibility barriers in procurement (considering either accommodation requests or general office procurement)?

## Public Prosecution Service of Canada – Accessibility Plan 2022

### *Creating a culture of belonging for employees living with a disability*

12 responses:

- ✓ **Yes:** 42%
- ✓ **No:** 58%

**Question:** What barriers have you experienced and how were you able to solve or address them?

5 responses:

- Mobility and accommodation issues for some. Meetings with management solved them.
- Delays in getting equipment. Managers unsure as to whose budget should pay for expense.
- Having to get an ergonomic assessment completed by Health Canada for a decent chair.
- Denial of equipment because it was not available from the retailers that Regional Manager had authority to order from.
- Additional delay and red tape in trying to have accessible equipment ordered and purchased.
- The federal government purchases equipment and software that are somewhat inaccessible.

**Question:** What aspects of the procurement process were effective and what aspects should be improved?

5 responses:

- A basic document outlining what the department can provide and what is required to establish the need.
- Quicker turnaround and more efficient advice to supervisors and managers.
- Better chairs.
- More expansive use of the Accessibility Passport.
- Minimization of the red tape and delays.
- One contact person that deals with accessible equipment and accommodations.

**Question:** What were the impacts of the delays on your work and/or personal health?

5 responses:

- Added stress and anxiety.
- Frustration and added struggles.
- Pain and suffering.
- Work could not get done properly and in required time frame.
- Could not fully perform duties.

**Question:** What does meaningful consideration of accessibility in procurement look like to you?

12 responses:

- That people will listen to, consider and respond, in a meaningful way, about providing resources and accommodation.
- Having a one on one (video chat) consultation(s) to gain a better understanding of the procurement process, accommodation needs, and disability realities.

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- Focus on equity in outcomes as well as prioritization of needs over costs.
- The definition of acceptable accessibility equipment available is able to encapsulate any circumstances requiring procurement support.
- That products suggested should be accessible by default. Should not be up to the employee to do this research.
- Buying decisions by the government of Canada have to comply with basic considerations in accessibility before the items are purchased.
- [Multi-line response:]
  - Managers listening to employees about their needs and being responsive to requests for equipment procurement.
  - Employees pre-approving the items acquired through the procurement process.
  - No requirement for employees to fill out paperwork. If a signature is required, the form comes pre-filled so the employer does the administrative work.
  - The employer orders and pays for the items, just as they would with any other item needed by an employee.
  - The employer does not comment at all on the cost of the item, or its impact on any kind of line in the budget.
- An NCE member mentioned that their office is pretty good with procuring accessibility products.
- The expenses would not be a burden to the regional budget.
- The requirements of people with disabilities are considered and taken into account in procurement initiatives.
- Working from home is ideal because of ergonomic chair, and a good environment with minimal distractions.
- My employer does not purchase any equipment, service or good that creates a new barrier or perpetuates an existing one.

#### **Question:**

Have you or someone you know encountered issues in defining user requirements for accommodation requests?

12 responses:

- ✓ **Yes:** 17%
- ✓ **No:** 83%

**Question:** Tell us a bit about the situation or issue you encountered with defining user requirements:

2 responses:

- An employee was having issues with ability to deliver work, but there was no research conducted on what was required for them to be better organized.
- A few employees had difficulty obtaining equipment needed to accommodate their physical disabilities, as there was a requirement of medical documentation.

#### **Question:**

In cases where there is no individual accommodation request, how are accessibility impacts factored into procurement decisions? (For example, office furniture or computer software procured for an entire team will have impacts on accessibility for each user).

12 responses:

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- N/A or do not know (5).
- Consultation with committees on the new acquisition, before anything is purchased.
- Accommodation is not a consideration at all when general procurement decisions are made, for example, provision of a tablet instead of a laptop to employees.
- Working in an open space, as employees are going to work at the office more often, is sometimes problematic for those who are sensitive to noise.
- Computer software procured for an entire team is beneficial. If an accommodation is needed, then the software is already in place, it is a way of being proactive and limiting delays.

## ANNEX D – PAST AND ONGOING ACHIEVEMENTS TO REMOVE AND PREVENT BARRIERS

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The PPSC has accomplished the following in terms of accessibility and disability inclusion:

- Appointment of a National Champion for Equity and Diversity – November 2017
- Appointment of a National Advisor for Employees Living with a Disability - 2019
- Appointment of a Senior Designated Official responsible for Employment Equity, Diversity and Inclusion (SDOEEDI) – January 2021
- Appointment of a National Liaison EDIA and Accessibility Officer, who also acts as the departmental Accessibility and Disability Champion – May 2021
- Publishing of a Bias-Free Workplace Initiative - May 2021
- Creation of a National Council of Employees for Persons Living with a Disability – September 2021. This council is led by two co-chairs and has seventeen (17) active members who meet on a monthly basis (see details in Annex A)
- Honouring International Day of Persons with Disabilities: The National Council of Employees for Persons Living with a Disability (NCE PwD) hosted a live one-hour panel discussion with five employees from different regional offices. The purpose of the discussion was to empower and uplift employees living with a disability, but also to provide staff with the opportunity to better understand the perspectives, needs and challenges of their colleagues with disabilities, both visible and invisible. By sharing their lived experiences, this panel helped destigmatize disabilities as well as broaden understandings of disabilities in our workplace – December 2021
- Communication sent to all employees on December 3, 2021 for International Day of Persons with Disabilities. We encouraged all employees to take some time to have meaningful conversations with their colleagues about accessibility and disability inclusion and reflect on what they can do in their day-to-day to be more inclusive. As well, a transcript and a video link to the live panel event was shared with all employees as well as information regarding a national event planned by Shared Services Canada – December 2021
- Virtual consultation with the NCE PwD on PPSC's new values - December 2021
- Publication of a simple guide to support PwD for supervisors and managers to encourage all employees to bring their full selves to work every day. The guide was also meant to encourage managers to provide a safe environment for their employees so they may feel comfortable in asking for the tools and adjustments that they need in order for them to succeed in their jobs. This guide was shared extensively with various communities of practice and colleagues in other departments – April 2022
- Launch of the first national accessibility survey that enabled us to assess the state of accessibility at the PPSC and collect data that served as the foundation for our first national Accessibility Plan. NCE members are leading sub-groups for each pillar. This survey was shared extensively with other departments and is posted on the GC Accessibility Hub – May 2022

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- Publication of the PPSC's EDIA Action Plan 2021-2024, which includes an accessibility component – May 2022
- Celebration of National AccessAbility Week 2022 - Daily email communications and activities prepared by the NCE PwD. A series of daily messages were sent, which included fact sheets and games, in order to make learning about accessibility issues fun. Helpful tips and fact sheets on various types of disabilities were prepared and distributed in an effort to educate, break down barriers, and help remove stigma. A national event for all supervisors and managers was organized and special guests from the Passport team at Treasury Board Secretariat presented the GC Workplace Accessibility Passport. A discussion ensued on how best to address accessibility and workplace adjustments needs for employees living with a disability – May 2022
- Fireside chat with Justice Richard Bernstein, a blind judge who sits on the Michigan Supreme court. Event organized by the NCE PwD in collaboration with the Ontario Regional Office EDIA Committee. His Honour discussed his experiences as a blind Justice as well as the role of disability issues in the law – June 2022
- Communication sent to all supervisors and managers following the June 2 national event. A toolkit is distributed which puts forward various approaches and best practices for supporting employees living with a disability discussed during the event – July 2022
- Initiative underway: reviewing the way that the PPSC is dealing with workplace accommodation and individualized adjustments in consultation with Labour Relations – Proposal to be reviewed by senior management in the coming months. The objective is to provide high quality, timely, and bias free services with all aspects of accessibility for PwD – Fall and Winter 2022-2023
- Establishment of a new committee of representatives from across the PPSC: this new multi-disciplinary committee includes all relevant leaders from various functional groups as well as a representative of the NCE PwD, in order to develop a mandate that will underpin the overall service model for workplace accommodation and adjustments – Fall 2022
- Email consultation with the Communications Division on accompanying visuals for the new PPSC values – September 2022
- Communication from Director of Public Prosecutions, Kathleen Roussel, in honour of National Disability Employment Awareness Month (NDEAM) sharing her vision on accessibility inclusion at the PPSC – November 2022
- Communication to all employees from the NCE PwD for Mental Health Month. Lessons learned about mental health injuries while being a professional written by a member of the NCE detailing his personal experience – October 2022
- Honoring International Day of Persons with Disabilities 2022: Campaign to encourage self-identification to ensure employees see this as a proud moment. National event led by employees living with a disability on the GC Accessibility Passport – November 2022
- Special communication from the NCE PwD for International Day of Persons with Disabilities, promoting an employee with a hearing impairment and detailing her experiences as a paralegal at the Ontario Regional Office – December 2022

### ANNEX E – FEEDBACK PROCESS

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The NCE PwD believes that it is crucial to start collecting feedback on accessibility from employees and individuals who deal with our organization. This feedback process will be managed by the National Liaison EDIA and Accessibility Officer.

The following is currently available:

- 1) **By mail**, at the following address:  
National Liaison EDIA and Accessibility Officer  
Advancement Centre for Equity, Diversity, Inclusion & Accessibility  
Public Prosecution Service of Canada, Government of Canada  
160 Elgin Street, 12th Floor  
Ottawa, Ontario  
K1A 0H8
- 2) **By telephone**, at the following toll-free number: 1-833-791-1086. Please leave a detailed message for the Accessibility Officer. Should you wish to leave your contact information, a member of the Advancement Centre for EDIA (ACEDIA) will return the call within three (3) business days.
- 3) **By email**: [PPSCAccessibilityFeedback@ppsc-sppc.gc.ca](mailto:PPSCAccessibilityFeedback@ppsc-sppc.gc.ca). A member of the ACEDIA will acknowledge receipt within three (3) business days.

**Via social media:** [!\[\]\(fa6f3af6bfa46c5d4a2d362681095beb\_img.jpg\) \(Twitter ENG\)](#) | [!\[\]\(a9bc825d1a15412853cf9ebcbd72219d\_img.jpg\) \(Twitter FR\)](#) | [!\[\]\(855eb27d3d242e620031eb19ab2e732f\_img.jpg\) \(LinkedIn ENG/FR\)](#) | [!\[\]\(528d698dbdf3a7863b8ddb9bfdc0181d\_img.jpg\) Facebook ENG](#) | [!\[\]\(74db6640e3542de97da9044296b61ac0\_img.jpg\) Facebook FR](#)

#### **Service Standards**

- 1) Feedback will be collected, processed and addressed by the National Liaison EDIA and Accessibility Officer, or a person designated in their absence from the Advancement Centre for Equity, Diversity, Inclusion and Accessibility.
- 2) Acknowledgement of receipt will be sent no later than three (3) business days following reception of the feedback.
- 3) Acknowledgement of receipt will contain the following elements.
  - a. Expression of thanks to the sender for their feedback.
  - b. Acknowledgment statement with a reference to the feedback received as well as the time and the day it was received.
  - c. Explanation as to the next steps that will be undertaken by the organization to address the feedback.



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- d. Estimation of the timeframe in which the sender can expect to receive an update or a full resolution to their issue.
  - e. Contact information on the person who will continue to follow-up on this specific feedback.
  - f. Signature of the person acknowledging receipt.
  - g. Date the receipt is sent, if done by regular mail.
  - h. Mention that the Advancement Centre for EDIA will remain available to the sender for additional follow-ups, as required.
- 4) Feedback will be compiled, tracked and monitored by the National Liaison EDIA and Accessibility Officer who will ensure follow-up with appropriate internal stakeholders.
- a. A table with a compilation of all feedback received will be kept up to date in a confidential GC Docs folder.
  - b. This table will be shared with internal stakeholders in the following manner. The names of the individuals who provide feedback will be kept confidential:
    - i. During one-on-one periodic conversations with internal stakeholders; or,
    - ii. During internal meetings of the new multi-disciplinary committee on accessibility; and,
    - iii. During monthly meetings with the NCE PwD.
- 5) Electronic and/or print copies of any feedback received, identified or anonymous, will be retained for a period of seven (7) years after reception.
- 6) Feedback received will be reported and addressed in future Progress Reports (December 2023 and December 2024).

Additionally, a confidential online feedback form is currently under development and will be finalized by March 31, 2023. This form will be available on our main digital platform and will allow employees, and individuals who deal with our department, the possibility of providing feedback confidentially. Should individuals wish to provide their names and contact information, the ACEDIA will acknowledge receipt and address the feedback directly with them as per the service standards mentioned above.

Catalogue No: J77-2E-PDF

ISNN 2817-1357 (Online)