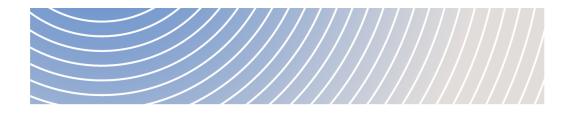
# Accessibility Plan



IMPACT ASSESSMENT AGENCY OF CANADA

December 2022



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# **List of abbreviations and acronyms**

Abbreviation/Acronym	Definition
EEDI	Employment Equity, Diversity and Inclusion
HR	Human Resource
PWD	Persons with Disabilities
The Plan	Accessibility Plan

# **Glossary**

Term	Definition
Barrier	Any obstacle — including physical, architectural, technological or attitudinal that is based on information or communications that is the result of a policy or a practice — that hinders the full and equal participation in society of persons with disabilities, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.
Disability	Any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or 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.

#### **General**

The Impact Assessment Agency of Canada (the Agency) delivers high-quality impact assessments that contribute to informed decision making on major projects in support of sustainable development. We serve Canadians through analyzing the environmental, economic, socio-cultural, and health impacts of potential projects. Our work is guided by principles such as partnership, cooperation, transparency, engagement, scientific evidence and Indigenous Knowledge.

In 2019, the *Accessible Canada Act* (the Act) marked a legislative undertaking towards a barrier-free Canada by January 1, 2040, through the identification and removal of existing barriers and prevention of new ones. In response to the Act, and in harmony with its key principles, the Agency has developed this Accessibility Plan (the Plan) with a vision to ensure that:

- a. all stakeholders, partners and members of the public, regardless of their disabilities are represented and treated with dignity and equity.
- b. a mechanism to identify, address and prevent all visible and invisible barriers to accessibility is implemented.

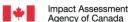
In compliance with the Act, the Plan delineates the Agency's commitment to enhancing accessibility in the following priority areas:

- a. Design and delivery of programs and services
- b. Culture
- c. Employment
- d. Built environment
- e. Information and communication technology (ICT)
- f. Communication (other than ICT)
- a. Procurement
- h. Transportation

At the core of the development of this Plan lies consultation and co-development. The identified barriers and respective activities in each priority area were derived through a mix of anonymous internal and external surveys, focus groups and one on one discussions to ensure that the Plan responds to the unique needs and challenges of persons with disabilities (PWD) who interact with the Agency.

The Plan is based on a holistic approach centered on consistent and ongoing engagement with persons with disabilities including partners, participants, managers, supervisors and staff to address systemic, attitudinal, physical and any other barriers at the Agency. This approach is consistent with the spirit of collective responsibility in accommodating needs of internal and external persons with disabilities to instill a culture of inclusivity at the Agency. This is also reflected in our Accessibility Statement defined as follows:

Our Vision for Accessibility: An inclusive, barrier-free, and accessible organization where persons of all abilities- staff, partners, stakeholders and members of the public-are well-supported and represented.





#### IMPACT ASSESSMENT AGENCY OF CANADA

We welcome feedback to help us achieve our vision for accessibility and to timely identify and mitigate barriers. Should you wish to provide feedback related to the Plan or if you wish to discuss missing elements, please contact the Employment Equity Diversity and Inclusion (EEDI) Team by:

Email: <a href="mailto:eedi@iaac-aeic.gc.ca">eedi@iaac-aeic.gc.ca</a>
Phone number: 343-574-3426

Mailing: 160 Elgin Street, 22nd Floor, Ottawa, Ontario K1A 0H3

To encourage readership and feedback, the Plan can be made available in various formats such as:

- print
- large print (increased font size and clarity)

Should you wish to gain access to an alternate format of the Plan, please contact <u>the EEDI Team</u>. The turnaround time for alternate formats is 15 days from the date of the request.

## **Key commitments**

We are committed to removing barriers for persons with disabilities and instilling a culture of inclusivity and belonging through:

- accessible learning, development opportunities and mandatory training to employees at all levels and across all areas of expertise
- systematic processes that ensure expedient accommodation at all tiers of the organization and established feedback mechanisms for process improvement
- increased recruitment and retention of persons with disabilities through targeted staffing processes and support for career progression
- enhancing the accessibility of the physical and digital environment for employees, stakeholders, and the members of the public
- regular engagement to ensure our policies, programs, services, and communication are accessible, barrier-free, inclusive, and responsive to the needs of persons with disabilities.

### **Eight priority areas**

#### Design and delivery of programs and services

The design and delivery of programs and services pertain to setting the strategic vision for accessibility at the Agency.

**Barriers**: While employment equity statistics are tracked quarterly at the Agency, a streamlined approach must be developed to address attitudinal, systemic, employment, and other barriers that affect accessibility at the Agency.

**Objectives**: We aim to implement a results-based approach to tackling accessibility barriers through setting targets, systems review, budgetary provision, and consistent engagement with persons with disabilities to ensure that accessibility is a key consideration in the design and delivery of programs and services.

Actions under this priority will inform the approach for the remaining priority areas of our Accessibility Plan:

#### 1. Establish a Persons with disabilities network

Leverage the existing Agency persons with disabilities safe space- an internal space where staff with disabilities voluntarily participate to offer each other support- to establish a Persons with disabilities network. This employee network will become a focal point for consultation regarding initiatives within the Agency and in identifying existing/emerging barriers to accessibility.

Timeline: May 2023

Responsible Team(s): The Employment Equity Diversity and Inclusion Team





Intended outcomes: Establish a Persons with disabilities network and define its roles and responsibilities.

#### 2. Develop and adopt an Accessibility Guide

Support, engage and consult the persons with disabilities network to develop and adopt an Accessibility Guide to design and deliver programs and services.

Timeline: June 2023

Responsible Team(s): The EEDI Team, Persons with disabilities network, and Sub-committee on Policy Review

Intended outcomes: The development of an Accessibility Guide with best practices and considerations in designing and delivering programs and services.

# 3. Use a data-driven approach to derive targets and identify and overcome barriers to accessibility

Use a data-driven approach to derive targets and identify and overcome barriers to accessibility through three sub-activities.

**A) Develop hiring targets** for persons with disabilities subject to regional workforce availability to ensure higher representation and create accountability to fill gaps.

Timeline: April 2023

Responsible Team(s): The EEDI Team

Intended outcomes: Set hiring targets for persons with disabilities that reinforce organizational commitment and establish relevant staffing strategies.

**B)** Conduct multi-year analysis at all stages of the employment cycle to identify and address persistent barriers.

Timeline: April 2024

Responsible Team(s): EEDI Team

Intended outcomes: Develop a robust understanding of the systemic barriers and other challenges experienced by persons with disabilities to enable management to implement targeted strategies to overcome the barriers.

**C)** Conduct an employment systems review to understand challenges surrounding representation and address them through actions in the Employment Equity, Diversity and Inclusion Plan.

Timeline: September 2024

Responsible Team(s): EEDI Team

Intended outcomes: A detailed understanding of barriers at each stage of the employment cycle.

#### 4. Centralize resources and dedicate a cost center

Centralize resources and dedicate a cost center to tools and resources needed for accessibility so that accommodation requests can be processed expediently.

Timeline: March 2023

Responsible Team(s): Finance

Intended outcomes: Expedient processing of accommodation requests that does not strain sectoral

budgets.

#### **Culture**

Culture implies an environment of awareness, inclusivity, and belonging that enables persons with disabilities to achieve full integration, acceptance, and participation in society.

Barriers: Data gathered through internal consultation revealed that a significant percentage of respondents have experienced or witnessed attitudinal barriers. These include stereotyping, presentation of information, and communication in a way that limits opportunities and/or offends the dignity of persons with disabilities at the Agency.

Objectives: We aim to foster a workplace culture of inclusion and respect through a commitment to creating awareness and promoting learning activities.

To meet our objectives, we have designed the following actions that ensure that barriers rooted in a lack of accessibility-related knowledge, biased behaviour, and stigma surrounding disabilities are addressed:

#### 1. Promote learning tools and raise awareness

Promote learning tools and raise awareness of the importance of accessibility and inclusion for staff and management through four sub-activities.

A) Run internal communication campaigns throughout the year to raise awareness of accessibility resources available to all employees.

Timeline: Ongoing

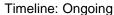
Responsible Team(s): EEDI Team, Communications, and Persons with disabilities network

Intended outcomes: Employees use the resources being promoted.

B) Offer workshops and training for managers on disability management, accessibility, inclusion, and duty to accommodate.







Responsible Team(s): EEDI Team

Intended outcomes: The outcomes will be tracked through the list of activities in the engagement plan.

**C)** Create an online repository of tools, resources, and training that support supervisors and managers in nurturing inclusivity within their teams, creating a safe environment for conversations around disability, and handling accommodation requests.

Timeline: October 2023

Responsible Team(s): Human Resources

Intended outcomes: Creation of a user-friendly online repository of tools, resources and training.

- **D)** Encourage staff to take part in the following accessibility training offered by the Canada School of Public Service:
  - Addressing Disability Inclusion and Barriers to Accessibility (INC115)
  - Disability Management and Workplace Wellness (INC120)
  - Understanding Unconscious Bias (INC105)
  - Video: Making Documents Accessible

Timeline: Ongoing

Responsible Team(s): EEDI Team and Communications

Intended outcomes: Employees take part in the training and use the resources being promoted.

#### 2. Support persons with disabilities

**A) Mobilize constructive dialogue** to harness and advance accessibility issues and concerns to the Agency's senior management.

Timeline: Ongoing

Responsible Team(s): Diversity and Inclusion Champions

Intended outcomes: Increased senior management's awareness of accessibility issues and concerns.

B) Leverage the Persons with disabilities network and our intranet site to promote resources available to employees with disabilities concerning wellness, mental health, counseling, conflict management, and other supports.

Timeline: Ongoing

Responsible Team(s): EEDI Team and Communications

Intended outcomes: Increased awareness and uptake of resources by employees who need support.

#### **Employment**

Employment includes outreach, staffing, onboarding, career progression, and retention to increase the representation of persons with disabilities at the Agency.

**Barriers**: The following barriers were revealed through internal consultations:

- Mechanisms for recruiting persons with disabilities are limited, hence it is difficult to invite job applications from persons with disabilities.
- Managers need an enhanced understanding that persons with disabilities may require a different onboarding process in terms of duration and accommodation requests.
- There is a lack of data on hiring trends thus there is a need for more investigation into hiring practices and skill sets of persons with disabilities.
- Persons with disabilities face challenges in their performance appraisal and the process needs to accommodate them to support their performance and career progression.
- There is limited training and other support available for persons with disabilities to acquire skills needed to progress in their careers.

Objective: Remove barriers and promote inclusive and accessible human resource practices at all stages of the employment cycle to increase the representation of persons with disabilities, and ensure that all employees, including persons with disabilities, are supported and able to contribute fully to the organization.

To meet our objectives, we have designed the following actions:

#### 1. Develop a targeted national outreach and staffing approach

Develop a targeted national outreach and staffing approach to streamline processes and increase the representation of persons with disabilities through two sub-activities.

A) Outreach to organizations that serve persons with disabilities to share employment opportunities at the Agency and provide accommodations when needed.

Timeline: Ongoing

Responsible Team(s): Human Resources

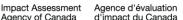
Intended outcomes: Outreach plan successfully implemented.

B) Promote inclusive staffing best practices for recruiting persons with disabilities in the online repository for hiring managers and the staffing team.

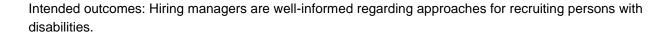
Timeline: Ongoing

Responsible Team(s): EEDI Team









# 2. Ensure that the Agency's onboarding, retention, and performance approach supports persons with disabilities

Ensure that the Agency's onboarding, retention, and performance approach supports persons with disabilities to fully integrate into their role through three sub-activities.

**A) Promote the modernized self-identification questionnaire** in a way that encourages staff to self-declare. The questionnaire is a useful tool to track progress related to Agency targets for recruitment and retention of persons with disabilities.

Timeline: Ongoing

Responsible Team(s): Human Resources and Communications

Intended outcomes: Improved tracking as more staff feel comfortable to self-declare their disability.

**B)** Add accessibility resources to the online repository for managers to provide support for onboarding new employees with disabilities. These resources will include the <u>Accessibility Passport</u> form and a guide with information on best practices, such as how to initiate a conversation with an employee who may require workplace accommodations and details about the accommodations process.

Timeline: September 2023

Responsible Team(s): EEDI Team in collaboration with Human Resources

Intended outcomes: Streamlined onboarding process for persons with disabilities.

**C)** Tailor performance appraisal mechanisms to accommodate employees with disabilities within the parameters set by the Performance Management Program.

Timeline: October 2023

Responsible Team(s): Human Resources in collaboration with senior management

Intended outcomes: Performance assessments of employees with disabilities duly consider their challenges alongside the requirements of their roles.

# 3. Leverage the existing career advancement supports for persons with disabilities

Capitalize on internal resources (career mobility tool, internal job postings, etc.) to support persons with disabilities to acquire skills necessary for progressing in their careers.

Timeline: Ongoing

Responsible Team(s): Human Resources

Intended outcomes: Higher uptake of internal resources available to persons with disabilities for career progression.

#### **Built environment**

An accessible built environment implies a building or a location that is spatially designed to be an inclusive space; conducive to use by persons of all abilities.

**Barriers**: Nearly half of the respondents who participated in the internal consultations reported limited awareness of the accessibility features of offices in their region. In addition, while most respondents find Agency offices and in-person meetings accessible, there is a need for consistent engagement to identify evolving barriers and take measures toward removing them.

**Objective:** Enhance the accessibility of the built-environment while taking into consideration the future of work and the hybrid workplace.

To meet our objective, we have designed the following actions:

#### 1. Ensure all the Agency offices across Canada are accessible

A) Review and identify areas in need of improvement in consultation with persons with disabilities (curbs, change in floor elevation, elevators, open-concept buildings, accessibility parking options, etc.)

Timeline: Ongoing

Responsible Team(s): Facilities Team

Intended outcomes: Document and address areas in need of improvement within the parameters of the Agency's jurisdiction.

**B)** Develop an Accessibility Checklist that outlines essential actions to make internal and external meetings more accessible in consultations with employees with disabilities. This can include a mandatory message that affirms the Agency's commitment to accessibility and enquires about the accommodation needs of internal and external participants, which can include equipment, location, and other requests.

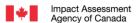
Timeline: November 2023

Responsible Team(s): Facilities Team, EEDI Team and Communications

Intended outcomes: Enhanced accessibility of internal and external meetings.

C) Review and update the Agency's Emergency Evacuation Plan by involving persons with disabilities in the process and practice of drills for evacuation.

Timeline: Annually



Canadä

Responsible Team(s): Facilities

Intended outcomes: An evacuation plan that takes into account the accommodation needs of staff.

**D)** Include accessibility clauses and standards within leases and future service contracts for managing large facilities.

Timeline: Ongoing

Responsible Team(s): Facilities Team

Intended outcomes: Enhanced accessibility of future buildings and spaces leased.

# 2. Ensure all employees are aware of the accessibility features of their offices and the supports available to them

A) Compile and communicate to employees the accessibility features of each Agency offices through our intranet site.

Timeline: August 2023

Responsible Team(s): Facilities Team, EEDI Team, and Communications

Intended outcomes: Centralized availability of building accessibility information for all employees.

**B)** Add Independent Emergency Plan to the Accessibility Passport so that the needs of employees requiring accommodations are adequately addressed in cases of emergency.

Timeline: Ongoing

Responsible Team(s): Human Resources, Facilities Team, and EEDI Team

Intended outcomes: The accessibility requirements of employees are well-documented for both emergency and non-emergency situations.

#### **Information and Communication Technologies**

Information and Communication Technologies pertains to technological (hardware and software) support that can enable employees to fully contribute in their roles at the Agency.

**Barriers**: About half of respondents to the internal consultations expressed some degree of satisfaction with the technological support that is available to them. Conversely, this also indicates that a large number of employees have faced barriers to accessing technological support. Internal consultation also revealed that the processing time for technological requests related to accessibility is also a barrier that prolongs the onboarding and integration of new employees with disabilities. It is important to note that most factors responsible for delays are exogenous to the Agency.

#### Objectives:

- Enhance technological support to process accommodation requests in a timely manner.
- Augment accessibility of tools developed internally and emphasize accessibility considerations at the time of software purchase.

# 1. Remove internal bottlenecks in the accommodation process and address emerging barriers

Timeline: Semi-annually (or as needed)

Responsible Team(s): EEDI Team, Human Resources and Information Services

Intended outcomes: Streamline internal processes to reduce delay between requests and accommodation.

#### 2. Conduct an accessibility assessment of current in-house tools

Conduct an accessibility assessment of current in-house tools (Assessment Management System, Human Resources Solution, and newsletter administrative module).

Timeline: April 2023

Responsible Team(s): Information Services

Intended outcomes: Develop a report with recommendations on corrective measures to incorporate into the digital plan for the next few years.

# 3. Ensure accessibility of content, applications developed in-house, and software procured in addition to the implementation of the upcoming accessibility standard

Timeline: Ongoing

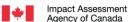
Responsible Team(s): Information Services

Intended outcomes: Accessible internal and external digital platforms.

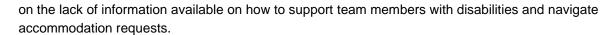
#### **Communication**

Communication includes the use of language, the platforms used to communicate, and the way information is presented and/or accessed.

**Barriers**: While the majority of respondents find Agency communication accessible and written in plain language often, they also indicated a high interest in plain language training. Respondents also commented







#### Objectives:

- Improve the availability of information, tools, and resources related to accessibility to support managers, supervisors, and employees in addressing concerns related to accommodation.
- Enable and encourage employees to create accessible documents and write in plain language.

# 1. Mandatory training to build employee capacity to write in plain language and create accessible documents.

Timeline: April 2023

Responsible Team(s): EEDI Team and Communications

Intended outcomes: Improved ability of staff to communicate in plain language and create accessible

documents.

# 2. Dedicate an intranet page for resources, tools and training on accessibility.

The page can offer:

- accessibility resources supporting managers over the employment cycle of an employee
- information on how to request accommodation
- resources and support available to employees
- information for by-standers who witness a lack of accommodation
- plain language training and other guidelines for effective communications
- templates for accessible communications
- accessibility features of Agency's offices
- Training and courses

Timeline: May 2023

Responsible Team(s): EEDI Team and Communications

Intended outcomes: Managers, supervisors, and employees are well-informed and equipped to address accessibility concerns in a timely manner.

#### **Procurement**

Procurement refers to the purchase of tools and equipment that are essential for persons with disabilities to perform well in their roles.

**Barriers**: Delays in the approval process can lead to delays in the purchase of necessary tools and equipment.

**Objective**: Streamline the procurement process for essential tools and equipment to minimize or avoid delays caused by internal factors.

#### 1. Regular review of the procurement process

To identify factors that cause delays in fulfilling accommodation requests and mitigate them.

Timeline: Ongoing

Responsible Team(s): Procurement Team

Intended outcomes: Minimized delays in meeting the accommodation needs of employees.

#### **Transportation**

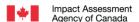
Transportation involves enhancing accessibility in work-related travel. As the Agency has only recently implemented a hybrid work model, no barriers and important actions pertaining to this priority area were identified during the consultation process. Any barriers and necessary actions identified during future consultations and engagement with the persons with disabilities network will be added as they arise.

#### **Consultations**

In the development of the Accessibility Plan, we consulted various audiences through different consultation tools.

- Internal survey: We surveyed employees to identify areas that required consideration from an accessibility viewpoint. Employees were asked to select prevalent barriers and rank satisfaction for different supports available. Over 80 employees responded to the survey of which about 30% identified as persons with disabilities. The data from the internal survey formed the basis for a more in-depth investigation into the various barriers listed under the priority areas above.
- External survey: Although the external survey was widely promoted on various platforms, it gathered only 10 respondents and therefore too small a sample size for meaningful inference.





- External consultation: Under the umbrella of the Employment Accessibility Resource Network, a consultation was held with persons with disabilities serving organizations and employers to identify barriers faced by persons with disabilities at all stages of the employment cycle.
- **Focus groups**: Following the analysis of data collected through the internal survey, a call-out was shared with employees to participate in a more detailed discussion. Five employees participated in this discussion and shared their viewpoints regarding challenges that managers and persons with disabilities face at each stage of the accommodation request and the employment cycle.
- One-on-one discussions: Approximately ten discussions were undertaken with employees with a
  wide range of visible and invisible disabilities, managers and supervisors, and human resources
  experts. These discussions were pivotal in developing an understanding of barriers faced by
  persons with disabilities at the Agency and identifying actions that can be undertaken to address
  them.

### **Monitoring and reporting**

The Agency will monitor the outcomes enlisted under the actions on an ongoing basis. A report on progress will be developed annually to evaluate our progress internally.

#### **Additional resources**

- Accessible Canada Act
- Digital Accessibility Toolkit / Sharing space
- GBA Plus: Equality or Equity?