



Office of the Superintendent of Financial Institutions Accessibility Plan 2023-2026



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1.0 Message from the Superintendent

As an organization, OSFI strives to create environments that are inclusive for everyone. To achieve this vision, a level of honesty and understanding is critical to address barriers at OSFI faced by any employee or stakeholder with a disability. Steps have been taken to acknowledge this and we are dedicated to moving forward in a positive way. For these reasons and many more, I am proud to introduce OSFI's Accessibility Plan 2023-2026.

The Accessibility Plan is our commitment to upholding the *Accessible Canada Act* (ACA) principles. This work will guide the future of our accessible workplace. The *Accessible Canada Act* aims to create a barrier-free Canada. It outlines expectations to improve overall accessibility and offer an environment that allows for more accessible technologies and products.

We understand that accessibility barriers can exist at different stages of a career. This plan is our commitment to supporting employees by evaluating the accessibility of OSFI practices, policies, and processes. It begins at the recruitment stage and continues until an employee exits the organization. We are also examining and working to correct barriers and accessibility gaps that any person visiting our premises may face. We commit to implementing this 2023-2026 plan diligently at all levels of the organization, and acting

swiftly to resolve new barriers that come to light along the way. Through experimentation, OSFI will strive to be an early adopter of innovative solutions to address barriers in our workplace.

I am very proud of OSFI's work to build a safe and respectful workplace, and this Accessibility Plan sets an important foundation to improve inclusivity for persons with disabilities.

Peter Routledge, Superintendent of Financial Institutions

2.0 General

2.1 Background on Office of the Superintendent of Financial Institutions

The Office of the Superintendent of Financial Institutions (OSFI) is an independent federal government agency that regulates and supervises more than 400 federally regulated financial institutions and 1,200 pension plans to determine whether they are in sound financial condition and meeting their requirements. OSFI analyzes financial and economic trends to identify emerging issues that could adversely affect institutions. Although OSFI plays an important oversight role, it does not manage the operations of institutions or pension plans. OSFI is a Schedule V agency under the *Financial Administration Act* (FAA) and governed by the *Public Service Employment Act* (PSEA).

OSFI is committed to supporting accessibility at all levels of our workforce. At OSFI, we are working on creating a barrier-free environment so that employees with disabilities are not prevented from providing their expertise in their service to Canada. We also want to make sure that the needs of any person with disabilities visiting our premises are always considered and met. We understand the importance of creating accessible and inclusive environments and are dedicated to helping create a more accessible Canada.

2.2 Organization contact information

The accessibility lead for OSFI is in the Culture, Inclusion and Development Unit. For more information, to provide feedback, to get a description of our feedback process or to request alternate formats of this Plan, you can contact:

Email address: accessible@osfi-bsif.gc.ca (<mailto:accessible@osfi-bsif.gc.ca>)

Culture, Diversity, Equity and Inclusion Advisor

Address:

255 Albert Street, 12th Floor

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All feedback will be acknowledged through the same means by which it was received, unless it was received anonymously.

Feedback can be submitted anonymously or with personal information identified.

If the feedback was not submitted anonymously, it will be acknowledged through the same means it was received within 15 business days.

2.3 Accessibility statement

OSFI's accessibility vision is to create a fully accessible, respectful, and inclusive workplace that values and enables disabled persons. While we work to develop our enterprise-wide Accessibility Strategy, we have created this Accessibility Plan following the framework identified in the Accessible Canada Regulations. The Culture, Diversity, Equity, and Inclusion Team is leading this work, but every employee at OSFI is responsible for learning about accessibility and demonstrating inclusion in their work, their workplace and their behaviours. We all have an important role to play.

To achieve that vision, the Accessibility Plan is designed to help all employees:

- Learn about accessibility and understand how barriers affect disabled persons
- Involve disabled persons during all phases of policy or program development/review
- Design experiences to be more accessible and inclusive
- Make communications accessible for everyone
- Develop the knowledge and skills to provide accessible programs and services
- Contribute to a culture of accessibility

OSFI's Accessibility Plan addresses the following key elements that create change and drive a culture of accessibility:

1. Policies and Procedures: OSFI will apply an accessibility lens and update its policies to provide clarity and consistency about what needs to be done, how it needs to be done and who is responsible for doing it.
2. Training and learning: OSFI employees will receive training to understand the new policies and processes, and their role in implementing them.
3. Communications: OSFI will integrate accessibility into internal and external communications and support staff in applying this in their work.
4. Key process integration: OSFI will integrate accessibility into every aspect of the design and delivery of its work.
5. Procurement: OSFI enters into contracts for external services and supplies. OSFI will apply an accessibility lens at every stage of the procurement life cycle.
6. Prioritization: Leadership will consider all the elements of the Accessibility Plan and will prioritize which to tackle first. This will be based on actions that make the biggest impact, build momentum, and drive change.

2.4 Definitions/ key terminology

Accessibility

Accessibility refers to how services, technology, locations, devices, environments, and products are designed to accommodate persons with disabilities. Accessibility means giving people of all abilities equal opportunities to take part in life activities. The term implies conscious planning, design, and/or effort to make sure something is barrier-free to persons with disabilities. Accessibility also benefits the general population by making everything more usable and practical for all people.

Barrier

According to the *Accessible Canada Act* (2019):

“Barrier means anything – including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice – that hinders the full and equal participation in society of persons with a physical, mental, intellectual, learning, communication or sensory impairment or a functional limitation.”

Disability

According to the *Accessible Canada Act* (2019), disability is:

“A physical, mental, intellectual, learning, communication or sensory impairment – or a functional limitation – whether permanent, temporary or episodic in nature, that, in interaction with a barrier, hinders a person’s full and equal participation in society.”

Anyone can identify as a person with a disability (PWD) if they experience one or more of these impairments or functional limitations that, in interaction with a barrier, hinders their full and equal participation in society.

Federal public service

Refers to the core public administration (departments and agencies named in Schedules I and IV of the *Financial Administration Act* (FAA), for which the Treasury Board Secretariat is the employer) and separate agencies (organizations named in Schedule V of the FAA).

Accessibility, Accommodation and Adaptive Computer Technology

The Accessibility, Accommodation and Adaptive Computer Technology (AAACT) is a program that offers public servants with disabilities a wide range of adaptive computer technologies, tools, training, services, and resources. The goal of the AACT program is to help the public service support departments who offer programs and services to Canadians and to build accessible workplaces with equal opportunities for all employees

Promising practices

The promising practices presented under sections 4.1 – 4.6 of this Plan are a short summary of the actions that OSFI is already taking to improve accessibility in the priority areas. Some of these actions may be completed and others may be in the process of being implemented.

Planned action

The planned actions presented under sections 4.1 – 4.6 of this Plan are the steps that OSFI intends to take to address the barriers. Some of these planned actions may have already begun and others may not yet have started.

2.5 Consultations

To prepare for developing our Accessibility Plan, OSFI conducted a series of virtual interviews with more than 40 OSFI employees. We worked to capture diverse perspectives throughout the organization. We also conducted a focus group with more than 15 members of the Mental Health and Accessibility stream of the Inclusion Network. The Inclusion Network is a grassroots collection of employees working to improve mental health and accessibility awareness and supports for OSFI employees. The focus group with this network was designed to facilitate honest feedback and identify barriers to accessibility within the organization.

Employees who were consulted as part of the process included:

- Individuals who self-identified as a person with a disability

- Individuals with impairments or health conditions who did not self-identify through OSFI's self-identification process
- Persons without a disability, impairment, or health condition
- Members of the Mental Health and Accessibility stream of the Inclusion Network
- Managers and supervisors of persons with disabilities
- Managers of divisions who work to provide accommodations for OSFI employees
- Managers and supervisors involved in the hiring and onboarding of employees, including persons with disabilities
- Managers who help, support, and enforce accessibility standards

2.6 Timelines for recommendations

With each recommendation made, OSFI has provided an expected timeline for implementation. The timelines are as follows:

- Short Term: approximately 0 – 1 year for completion
- Medium Term: approximately 1 – 3 years for completion
- Long term: approximately 3 or more years for completion

These suggested timelines consider the magnitude of the recommended action, the nature of the organization, and the potential barriers that may occur during the implementation process. Due to the complexity of implementation, these timelines are estimates and should not be interpreted as strict commitments.

3.0 Executive summary

OSFI as an organization is committed to creating a barrier-free workplace. The practice of creating this Accessibility Plan has revealed many things OSFI is doing well towards this goal as well as several areas for improvement. The primary focus of this Plan was to

capture the perspectives of OSFI employees with lived experience and to understand diverse perspectives across OSFI. The findings presented in this Plan highlight these perspectives.

The barriers and recommendations in this Plan are presented across the seven priority areas under the *Accessible Canada Act (ACA)*, but there are several barriers to accessibility that touch multiple core areas.

One of these barriers is the need for improved communication regarding accessibility work already being done at OSFI. Our organization has taken many steps to remove barriers, simplify processes, and improve accessibility at large. These initiatives need to be better communicated to all employees so that the accessibility supports are understood.

There is also a need to improve accessibility training throughout the organization. Training needs to be offered at both the general awareness level as well as the role-specific level. OSFI will be working with managers to better understand the training needs for each role and will provide training accordingly.

The entire employee experience has been a core consideration in the development of this plan. OSFI wants to ensure that all aspects of accessibility are considered, from the first interaction a prospective employee has with OSFI until the time an employee leaves the organization. For this to happen, feedback from employees with disabilities is critical. OSFI is committed to implementing the planned changes in close consultation with persons with disabilities.

This Plan represents only the beginning stages of the work needed to eliminate barriers to accessibility at OSFI. As an organization, we are dedicated to following through on the actions presented in this Plan. We are excited to make progress in the coming years.

4.0 Areas described under the Act

There are seven priority areas described under Section 5 of the *Accessible Canada Act*.

These areas include:

- employment
- the built environment
- information and communication technologies (ICT)
- communication, other than ICT
- the procurement of goods, services, and facilities
- the design and delivery of programs and services
- transportation

The following sections are divided into these areas. Each section will include a short summary, promising practices, barriers, and actions we plan to take to address each barrier.

4.1 Employment

Employment includes an employee's entire experience at OSFI, from the time the recruitment process starts until they leave the organization. OSFI wants employees with disabilities to feel supported throughout their journey with us. This includes recruitment, hiring, onboarding, development, promotion, and exit from the organization. OSFI cares about being a responsible employer and is committed to ensuring a barrier-free workplace for all employees.

Promising practices

- OSFI has worked to increase accessibility within the human resources selection process. From the beginning, hiring posters highlight how candidates can request accommodations for the job application and assessment processes.
- OSFI is attracting new talent through targeted student recruitment for persons with disabilities through the Federal Student Work Experience Program (FSWEP). This program encourages candidates to self-identify in their application.

- Diversity, Equity, and Inclusion (DEI) is now included as a performance measure in the annual performance management agreements of all employees. This works to directly promote accessibility considerations at the employee level.
- Data is regularly collected on the hiring and employment of persons who self-identify in the various Employment Equity (EE) groups including employees with disabilities.

Barriers and actions

Barriers to accessibility observed at OSFI related to employment include:

Barrier 1

OSFI recognizes the importance of training to improve awareness and understanding of accessibility. We have identified a lack of accessibility training at both the onboarding and role-specific levels. Standard training for all employees creates a baseline understanding of accessibility. OSFI employees have also expressed the need for training specific to their roles. Some role-specific training has been done. For example, there has been web accessibility training for the web team within Communications, Engagement and Stakeholder Affairs. However, OSFI would like to see more job-specific training on accessibility across the organization.

Planned action to address barrier 1 (Medium term: 1-3 years)

OSFI will complete a review of the training platforms and courses available. OSFI will work with team leads within each of the divisions to understand the type of training required specifically for their staff. OSFI will take action to provide training in a timely manner.

Responsibility and outcomes

- Responsibility: Head of Human Resources
- Outcome: Improved accessibility training opportunities at OSFI both at the onboarding and at role-specific levels

Barrier 2

OSFI has worked to attract and retain employees with disabilities. However, efforts must be made to ensure that Canadians with disabilities continue to be properly represented within OSFI. OSFI needs to identify where barriers to employment for persons with disabilities may exist within our hiring practices.

Planned action to address barrier 2 (Medium term: 1-3 years)

OSFI will review the staffing process to explore where barriers might exist for disabled applicants. OSFI also plans to increase disabled employee representation by developing a persons with disabilities-specific outreach program. By building relationships with organizations that support employment of persons with disabilities, OSFI can better promote employment opportunities.

Responsibility and outcomes

- Responsibility: Head of Human Resources
- Outcome: Increased representation of employees with disabilities at OSFI through specific outreach and the removal of barriers for disabled applicants

New accessibility barriers and actions identified in 2023

Barrier 1

The internal partners at OSFI that are involved in providing accommodations need clarity on specifics of the accommodation process including budget impacts and where to escalate requests that cannot be easily met. Employees also report being unfamiliar with and lacking clarity on the process to receive accommodations on the job.

Planned action to address barrier 1 (Medium term: 1 to 3 years)

OSFI will develop a process map for the accommodation process. This process map will clearly outline the steps employees should take to receive accommodations and the roles and responsibilities that fall to each internal partner.

Responsibilities and outcomes

- Responsibility: Chief Human Resources Officer (CHRO), Chief Financial Officer (CFO) and Communications, Engagement, and Consultations

- Outcome: Employees are informed of the accommodations process and internal partners clearly understand their roles and responsibilities to support accommodations at OSFI.

Barrier 2

There is a need to improve the overall culture of accessibility at OSFI. Employees report feeling stigmatized for self-identifying as a person with a disability. Employees may also fear negative career impacts for seeking accommodations both on the job and during a staffing process.

Planned action to address barrier 2 (Medium term: 1 to 3 years)

OSFI recognizes the importance of developing a strong culture of inclusion and accessibility. OSFI also recognizes that we need to be doing more to highlight the actions we are currently taking to advance accessibility. HR will celebrate **AccessAbility Week** (<https://www.canada.ca/en/employment-social-development/campaigns/national-accessability-week.html>) and will create an Accessibility landing page on OSFI's intranet to share our progress and build awareness of tools, resources and training available to staff.

Responsibilities and outcomes

- Responsibility: Chief Human Resources Officer (CHRO)
- Outcome: An improved culture of inclusion and accessibility at OSFI

4.2 Built environment

The built environment at OSFI includes all physical spaces that OSFI employees interact with as part of their work, including work from home.

OSFI understands that accessible spaces are key to having an environment where people with disabilities can work to their full potential. Achieving accessibility of built environments is complex, because OSFI has employees who work in hybrid environments and office locations in Ottawa, Toronto, Montreal, and Vancouver.

OSFI has taken many steps towards creating and maintaining accessible spaces for our employees. We are working to identify barriers at our office locations and to make our spaces as universally accessible as possible. We will create more opportunities for our employees with disabilities to provide feedback on the built environment. We will also act quickly to fulfill accessibility related requests.

OSFI is dedicated to removing any physical barriers our employees with disabilities face. We will always consider accessibility as we build and update our spaces.

Promising practices

- OSFI offices are designed to be physically accessible. We have implemented sit/stand desks, ergonomic chairs, motion sensed doors, ramps, accessible washrooms, adjustable monitors, and more.
- At the outset of the COVID-19 pandemic, OSFI eliminated the requirement that employees provide a doctor's note to receive an ergonomic assessment. OSFI is committed to ensuring that our employees receive the proper accommodations for their needs by providing ergonomic assessments to any employee who requests one.
- More than 60% of staff have ergonomic chairs at home that were obtained through an accommodation request.
- OSFI is currently working on modernizing the Toronto, Ottawa, and Vancouver offices to new Government of Canada standards, which will include enhancements to be more flexible and accessible.

Barriers and actions

Barriers to accessibility observed at OSFI related to built environment include:

Barrier 1

As OSFI transitions into a hybrid working environment, employees raised concerns about the accessibility constraints of unassigned seating. Unassigned seating can lead to challenges for employees with disabilities to have access to the tools and technologies they need to work effectively.

Planned action to address barrier 1 (Short term: 0-1 year)

OSFI is committed to ensuring every employee feels fully supported when coming into the office to work. OSFI will also be engaging with persons with disabilities within the organization to collaboratively design a system of shared accessibility and ergonomic tools.

Responsibility and outcomes

- Responsibility: Head of Facilities
- Outcome: Improved accessibility of office spaces within the hybrid working environment

Barrier 2

OSFI made major strides in offering ergonomic assessments to all employees who requested one. However, there are still many employees who do not go through the process of making these requests. Ergonomic assessments help all employees feel comfortable while doing their job. Ideally, more employees should be aware that these assessments are offered to all employees.

Planned action to address barrier 2 (Medium term: 1-3 years)

OSFI believes in supporting employees in their working setups and will continue to provide standard ergonomic assessments to all OSFI employees who request one. OSFI will work to better promote these assessments.

Responsibility and outcomes

- Responsibility: Head of Facilities
- Outcome: Improved workplace knowledge of ergonomic assessments for all OSFI employees

Barrier 3

The Facilities team within OSFI works hard to be responsive to employees' accessibility needs. However, there is opportunity to further engage with OSFI's PWD community. OSFI understands that employees with lived experience of disability have valuable insights on

how to make improvements to the built environment. The Facilities team at OSFI wants to add more ways to gather feedback about the built environment from employees with disabilities.

Planned action to address barrier 3 (Medium term: 1-3 years)

The Facilities team within OSFI will create an open call out to all employees requesting feedback on how the built environment could be made more accessible. As well, OSFI will explore bringing in built environment accessibility professionals to review built environment locations.

Responsibility and outcomes

- Responsibility: Head of Facilities
- Outcome: A stronger awareness of accessibility needs related to OSFI physical locations

Barrier 4

OSFI has historically had emergency evacuation plans that properly considered the needs of employees with disabilities. Some of the policies in these plans have been impacted due to the changing nature of the hybrid working environment. OSFI needs to review these evacuation plans to make sure we are still considering the needs of all employees.

Planned action to address barrier 4 (Medium term: 1-3 years)

OSFI will conduct a review of existing evacuation policies to identify ways for safe evacuation for all employees in the hybrid working environment. This review will include engagement with employees with disabilities to confirm evacuation policies fit the needs of all employees.

Responsibility and outcomes

- Responsibility: Head of Facilities
- Outcome: Safe, long-term evacuation solutions for all employees

New accessibility barriers and actions identified in 2023

Barrier 1

Many employees at OSFI are still not fully aware that accommodations for assigned seating can be provided under certain circumstances. There is a formal process for requesting an accommodation for assigned seating but there is a lack of awareness around this policy and process.

Planned action to address barrier 1 (Medium term: 1 to 3 years)

OSFI will communicate the process for requesting an assigned seating accommodation. OSFI will map out this process and provide clearer guidance to employees and managers about the proper steps to follow to receive accommodations.

Responsibilities and outcomes

- Responsibility: Chief Security Officer (CSO) and Chief Human Resources Officer (CHRO)
- Outcome: Increased transparency for employees on the steps they can take to receive accommodations

Barrier 2

The facilities team at OSFI is highly committed to supporting accessibility but are not always fully aware of the barriers faced by employees.

Planned action to address barrier 2 (Medium term: 1 to 3 years)

The facilities team will engage more closely with OSFI employees and HR to understand the types of barriers experienced in the built environment. OSFI will address the concerns raised by employees with disabilities. OSFI has used QR codes on desks in the past for staff to provide feedback and they will explore using this tool again to seek feedback on accessibility.

Responsibilities and outcomes

- Responsibility: Chief Security Officer (CSO)
- Outcome: Improved awareness of employees' needs and the accessibility barriers they face at OSFI offices

Barrier 3

In the past several years, OSFI increased the number of automatic door openers in our office locations. Currently a number of these are not fully functional.

Planned action to address barrier 3 (Short term: 0 to 1 year)

OSFI is aware of this problem and will work towards fixing these door openers in the early part of 2024.

Responsibilities and outcomes

- Responsibility: Chief Security Officer (CSO)
- Outcome: Improved access to all OSFI physical locations using automatic door openers

4.3 Information and communication technologies

Information and Communication Technologies (ICT) in this report relates to all aspects of the technologies OSFI employees interact with as part of their job.

OSFI is making accessible ICT a top priority. We are aiming for universal design in our systems, making them easy to use for all while supporting individuals' needs as required. OSFI wants to confirm that our hardware and software can be used by people with a wide range of abilities and disabilities. We are moving from a reactive approach to a proactive approach, where we plan for accessibility by design.

We also intend to improve our processes, practices, and communications about ICT to support accessibility. We are working toward a future where fewer barriers exist in ICT at OSFI for persons with disabilities and where obstacles to full participation are quickly removed.

Promising practices

- Accessible software and hardware used for accommodations is available to all OSFI employees. It is being repurchased and updated as needed.
- Most accessible software requests are provided to employees right away. Most requests that are not fulfilled right away typically take fewer than two weeks to

resolve.

- The IT Service Desk is prioritizing accessibility-related requests.

Barriers and actions

Barriers to accessibility observed at OSFI related to ICT include:

Barrier 1

The IT Division at OSFI is building up a solid base of accessible hardware and software offerings. There is a concern, though, that employees lack an understanding of the tools available to them. Not enough communication has been provided to make employees fully aware of accessibility offerings within IT.

Planned action to address barrier 1 (Short term: 0-1 year)

OSFI and the IT Division are committed to promoting a variety of accessibility offerings to employees and plan to create a comprehensive list of all accessibility tools and resources. OSFI will share this list with all employees to familiarize them with what is available and what types of tools can be requested.

Responsibility and outcomes

- Responsibility: Head of IT
- Outcome: Increased familiarity of the accessibility tools and resources employees can access through IT

Barrier 2

Both the IT and Service Desk teams within OSFI are committed to delivering high quality support to all employees. We are especially committed to ensuring accessibility barriers are addressed. Overall, there needs to be a review of all ICT processes to ensure that they are accessible for OSFI employees.

Planned action to address barrier 2 (Medium term: 1-3 years)

OSFI will work in consultation with persons with disabilities to perform a review of all ICT processes to establish where accessibility barriers may exist and how these barriers can be eliminated. OSFI will develop a communications plan to clarify any ICT processes that are unclear. OSFI will also provide documentation around accessibility considerations in each process.

Responsibility and outcomes

- Responsibility: Heads of IT and Service Desk
- Outcome: Increased clarity on how to submit accessibility requests to IT and improved turnaround times for requests to be addressed

Barrier 3

OSFI needs to assess legacy tools and platforms used by OSFI employees to determine where they may present accessibility barriers.

Planned action to address barrier 3 (Long term: 3+ years)

OSFI aims to develop a high-level strategy around the use of these tools. Many of these tools are not developed internally at OSFI and are beyond the control of the organization. OSFI will verify that IT and Service Desk employees are familiar with the challenges posed by these platforms. IT and Service Desk employees will be available to support staff in navigating these platforms.

Responsibility and outcomes

- Responsibility: Heads of IT and Service Desk
- Outcome: Increased support for employees working to navigate platforms with accessibility barriers

4.4 Communications other than information and communication technologies

This section defined under the ACA relates to all forms of communications distributed within OSFI and communications distributed outside of the organization.

OSFI is committed to making all internal and external communications for the organization accessible by design – a mindset of designing policies, products, processes, and services with accessibility at the forefront. We want everyone to clearly understand the information we share and have easy access to information in formats that work for them.

Our goal is to exceed accessibility standards for communication by regularly reviewing our internal and external websites, documents, videos, and other media. We will create avenues for people with disabilities to provide feedback.

OSFI has already established many promising practices in accessible communications. We will work to share these practices across the organization. OSFI will create more opportunities for our employees and stakeholders to understand accessibility and share our commitment to being accessible by design.

Promising practices

- The Communications Team is currently prioritizing redesigning OSFI's external and internal facing websites to be accessible by design. The team is ensuring there is alternative text for images, a clean layout to help the digestibility of content, and large fonts.
- The Communications Team is using web renewal as an opportunity to educate all OSFI employees about accessibility design practices through accessible web development training.
- The Web Renewal and Web Team is running weekly web meetings that cover accessibility best practices.

Barriers and actions

Barriers to accessibility observed at OSFI related to Communications and other than ICTs include:

Barrier 1

Although accessibility is a priority for OSFI, more can be done to ensure that all content developed for external and internal audiences (including Portable Document Formats, also known as PDFs, Power Point, Word, and videos) is accessible and meets accessibility standards.

Planned action to address barrier 1 (Medium term 1-3 years)

OSFI is moving towards an accessible by design model. In doing so, employees will be aware of the proper accessibility standards for creating content. This movement towards accessibility by design will include the development of standards, training, and communications around the various aspects of accessibility.

Responsibility and outcomes

- Responsibility: Head of Communications and Stakeholder Affairs
- Outcome: OSFI employees have increased knowledge on how to make content more accessible for internal and external use.

Barrier 2

Although OSFI is working hard to implement accessibility across all forms of communications, we want to better understand the types of accessibility requirements needed by OSFI employees.

Planned action to address barrier 2 (Medium term: 1-3 years)

The needs of all employees must be fully understood to remove communications barriers. OSFI will engage with employees with disabilities to understand their needs in this area and look at options to implement findings.

Responsibility and outcomes

- Responsibility: Head of Communications, Head of Human Resources
- Outcome: Barrier-free internal communications for all OSFI employees

New accessibility barriers and actions identified in 2023

Barrier 1

An internal guide on using plain language currently does not exist at OSFI.

Planned action to address barrier 1 (Short term: 0 to 1 year)

The Communications, Engagement and Stakeholder Affairs team has been working on a guide for the use of plain language that will be published in 2024. This guide will support all employees in understanding the fundamentals of plain language writing.

Responsibilities and outcomes

- Responsibility: Head of Communications, Engagement and Stakeholder Affairs
- Outcome: Improved guidance on how employees can write in plain language. An improved overall awareness of plain language writing will decrease the need for revisions by OSFI editors

Barrier 2

Documents that are shared with the public continue to contain highly technical language that is not accessible to many audiences. OSFI recognizes that the nature of content produced by subject matter experts is often highly technical, but more could be done to make content more readable, clear, and concise.

Planned action to address barrier 2 (Medium term: 1 to 3 years)

OSFI is committed to moving towards more accessible forms of writing in our internal and external documents. We will provide clearer examples and expectations to subject matter experts on how to write accessibly. A culture shift will be required to fully act on this change and OSFI will support all employees in writing more accessibly.

Responsibilities and outcomes

- Responsibility: Sector heads with support from Head of Communications, Engagement and Stakeholder Affairs and Enterprise Change Management
- Outcome: Improved accessibility and readability of all documents that OSFI produces

4.5 Procurement of goods, services, and facilities

This section on procurement relates to all goods and services procured by OSFI as well as the procurement process itself.

As a large purchaser of goods and services, the federal public service can be a leader in accessible procurement. OSFI wants to incorporate universal design principles into procurement processes and consider the diverse needs of the broadest range of end users. We understand that thinking about accessibility from the beginning can cost less than modifying or replacing a good or service later.

OSFI will include accessibility criteria when specifying requirements for goods or services. OSFI will also incorporate accessibility features. We are committed to improving our processes and practices to make sure that requests for purchases related to accommodations for employees with disabilities are quickly managed. We want procurement at OSFI to be inclusive by design and accessible by default.

Promising practices

- The OSFI procurement team has proactively designed many of their procurement forms to be fully accessible, including forms for procurement requests, security requirements, and statements of work.
- OSFI is working to align its internal procurement procedures more closely to the contracting policy as it relates to accessibility.
- OSFI is working to increase training for accessible procurement. Our procurement team engaged Public Services and Procurement Canada to receive a training session on accessible procurement.

Barriers and actions

Barriers to accessibility observed at OSFI related to procurement include:

Barrier 1

OSFI needs to increase accessibility training for procurement officers to allow these officers to better question vendors when identifying accessibility needs.

Planned action to address barrier 1 (Short term: 0-1 year)

OSFI will increase accessibility training across the organization. We will provide specific training to procurement officers highlighting accessibility standards and clearly articulating OSFI's expectations from vendors.

Responsibility and outcomes

- Responsibility: Head of Procurement
- Outcome: Stronger enforcement of accessibility standards for OSFI vendors

Barrier 2

OSFI has already worked to make many of its procurement forms accessible internally. However, an increased effort around ensuring all procurement forms are standardized and meet accessibility standards is needed.

Planned action to address barrier 2 (Medium term: 1-3 years)

OSFI will conduct an audit of all procurement forms to evaluate their respective levels of accessibility. We will focus on ensuring outstanding accessibility gaps are addressed in these forms.

Responsibility and outcomes

- Responsibility: Head of Procurement
- Outcome: A consistently high level of accessibility across all procurement forms used by OSFI employees

Barrier 3

OSFI has requirements for prospective vendors to address accessibility in their proposals. However, many proposals that come in to OSFI are missing these requirements.

Planned action to address barrier 3 (Medium term: 1-3 years)

OSFI will work to make the requirements of prospective vendors clearer as it relates to accessibility. OSFI will also evaluate the potential of changing evaluation criteria to amplify accessibility in procurement decisions.

Responsibility and outcomes

- Responsibility: Head of Procurement
- Outcome: Stronger enforcement of accessibility as an evaluation metric for vendor bids

New accessibility barriers and actions identified in 2023

Barrier 1

Many procurement documents, including Request for Proposals (RFPs), are still being sent as PDFs. This is typically less accessible than other options.

Planned action to address barrier 1 (Medium term: 1 to 3 years)

The procurement team is working to improve the accessibility of all procurement documents and will be looking to move away from PDFs. Additional training will be offered to the procurement team for how to best support the transition to fully accessible document types.

Responsibilities and outcomes

- Responsibility: Head of procurement
- Outcome: More accessible procurement documents

Barrier 2

There is still a lack of consistency at OSFI to include accessibility requirements in contracting documents. It is best practice to include requirements for accessibility directly in contracts so that suppliers know they are expected to provide their services in a fully accessible manner. Often, contract documents do not clearly state these accessibility requirements and suppliers are therefore not held to a high enough accessibility standard.

Planned action to address barrier 2 (Medium term: 1 to 3 years)

Senior leaders at OSFI need to lead by example and ensure that all statements of work that are provided to procurement include accessibility requirements for suppliers. OSFI will support this by increasing education and awareness about accessibility best practices

that can and should be included in contract documents.

Responsibilities and outcomes

- Responsibility: Sector heads and head of procurement
- Outcome: The inclusion of accessibility requirements for all OSFI suppliers

4.6 Design and delivery of programs and services

This section is centered around the ways in which OSFI engages with all external stakeholders.

As a prudential regulator, OSFI undertakes regulatory and supervisory activities as its main business line of service delivery. OSFI is working hard to become a more inclusive workplace for persons with disabilities. However, we need to better understand the accessibility of our interactions with our external stakeholders. We will seek out best practices and develop tools to better serve and respond to feedback from our stakeholders with disabilities.

Promising practices

- OSFI currently offers its stakeholders multiple ways to contact us (i.e., email, phone call, in person, mail).
- OSFI is prioritizing the renewal of its external internet website to increase accessibility for all users.
- OSFI has received positive feedback from external stakeholders around accommodations.

Barriers and actions

Barriers to accessibility observed at OSFI related to design and delivery of programs and services include:

Barrier 1

There is no publicly available process for external stakeholders to request accommodations or accessible materials from OSFI. Currently, stakeholders work with their point of contact at OSFI to ask for accommodations. OSFI could work to formalize this process.

Planned action to address barrier 1 (Medium term: 1-3 years)

OSFI will develop a robust process and make available so that stakeholders receive a consistently high level of accessibility support. This process will highlight to stakeholders the variety of ways accommodations can be provided and how they can make a formal request to receive these, as well as provide feedback.

Responsibility and outcomes

- Responsibility: Head of Communications and Stakeholder Affairs, Head of Human Resources
- Outcome: More transparency for OSFI stakeholders on how to make accommodation requests

Barrier 2

Individual aspects of internal service delivery are doing well from an accessibility perspective. OSFI will now continue to focus our efforts on developing an overall strategy focused on accessibility for our both our internal and external stakeholders.

Planned action to address barrier 2 (Medium term: 1-3 years)

OSFI plans to start a formal conversation with relevant members of OSFI's leadership to build out an accessibility strategy for internal and external service delivery. OSFI will engage with stakeholders in the development phase of the strategy to better understand what OSFI can do to further reduce and remove barriers during engagements.

Responsibility and outcomes

- Responsibility: Head of Communications and Stakeholder Affairs, Chief Operating Officer
- Outcome: Consistent standard of accessibility provided to all stakeholders

4.7 Transportation

New accessibility barriers and actions identified in 2023

Barrier 1

The transition to a hybrid working environment has presented new accessibility barriers to employees with mobility challenges. Employees who are returning to OSFI offices have reported challenges in transportation options and parking access. OSFI is committed to more fully understanding these barriers and working with employees to implement solutions that support accessibility needs.

Planned action to address barrier 1 (Medium term: 1 to 3 years)

OSFI will perform a specific review of transportation barriers presented by the hybrid working model. We will be engaging employees to provide feedback on where these barriers lie and how we can best address them.

Although OSFI does not own its own parking garages or provide parking for all employees, we will prioritize accessible parking spaces for employees with mobility disabilities and will also support other measures that are within OSFI's authority and control.

Responsibilities and outcomes

- Responsibility: Chief Human Resources Officer (CHRO)
- Outcome: Reduced accessibility barriers for employees working at OSFI offices

5.0 Reporting and implementation

This Accessibility Plan is an important step for OSFI to create a more accessible workplace, but it cannot stand alone. Throughout this Plan, we have highlighted our commitments to addressing barriers within our organization. We are dedicated to acting on these commitments.

The *Accessible Canada Act* mandates that annual progress reports be published to track progress on the implementation of the actions described in this Plan. OSFI is excited to continue the implementation of these actions. The progress reports we publish in the coming years will reflect our commitment to becoming barrier-free for persons with disabilities.

OSFI will be working in consultation with persons with disabilities to establish tracking and reporting mechanisms to monitor progress against the action items in this plan. The monitoring of progress against these actions will hold OSFI accountable to the accessibility commitments we have made. It will push us to work beyond just the actions set forth in this plan.

OSFI will continue to identify barriers to accessibility within our organization. We will remain committed to addressing these barriers and creating an organization that is inclusive of all.

6.0 Feedback process

OSFI welcomes feedback on accessibility, especially from persons with disabilities. We have established the following process for receiving and actioning feedback related to accessibility. Feedback related to barriers to accessibility at OSFI or the implementation of OSFI's Accessibility Plan can be directed to:

Email address: accessible@osfi-bsif.gc.ca (<mailto:accessible@osfi-bsif.gc.ca>)

Mail:

Culture, Diversity, Equity and Inclusion Advisor

255 Albert Street, 12th Floor

Ottawa, ON K1A 0H2

Canada

Telephone number: 1-800-385-8647

TTY: 1-800-465-7735

Fax: 613-990-5591

All feedback will be acknowledged through the same means by which it was received, unless it was received anonymously.

Feedback can be submitted anonymously or with personal information identified.

If the feedback was not submitted anonymously, it will be acknowledged through the same means it was received within 15 business days.

The feedback will be taken into consideration by the Culture, Inclusion and Development team. It will then be forwarded to relevant divisions when necessary.

If the feedback included contact information, any immediate action resulting from the feedback will be communicated to the person who submitted the feedback. All feedback related to accessibility will be captured in a central location for analysis and recordkeeping. Feedback will be used to help identify, prevent, and remove barriers in a timely manner.

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