



Accessibility Plan Progress Report 2023



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Office of the Superintendent of Financial Institutions Accessibility Plan Progress Report 2023

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1. General

1.1 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 Progress Report, you can contact:

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

Culture, Diversity, Equity and Inclusion Advisor

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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.

1.2 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.

1.3 Accessibility statement

OSFI's accessibility vision is to create a fully accessible, respectful, and inclusive workplace that values and enables disabled persons. While we 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 and progress reports are 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 and progress reports address 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.

1.4 Definitions and 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 Program

The Accessibility, Accommodation and Adaptive Computer Technology (AAACT) Program 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 to 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 to 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. Consultations

To prepare for developing our Accessibility Plan Progress Report, OSFI held virtual meetings with more than 25 OSFI employees. We worked to capture diverse perspectives throughout the organization. We hosted meetings for priority area leads to better understand progress that has been made to improve accessibility within their priority area. We also conducted a focus group with members of the Mental Health and Accessibility (MHA) stream of the Inclusion Network and a focus group with members of the Employment, Equity and Diversity Advisory Committee (EEDAC). The MHA stream is a

grassroots collection of employees working to improve mental health and accessibility awareness and supports for OSFI employees. The EEDAC is an employee-led committee that supports the organization's annual Employment Equity Plan and monitors its progress on a periodic basis. Lastly, an all-staff call-out was sent to employees offering two different meeting times to participate in a focus group to share their perspective on accessibility at OSFI. All consultations as part of this process were designed to facilitate honest feedback and identify barriers to accessibility within the organization.

Employees who were consulted as part of the process include:

- Individuals who self-identify 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
- Members of the Employment, Equity and Diversity Advisory Committee (EEDAC)
- Managers and supervisors of persons with disabilities
- Managers of divisions who work to provide accommodations for OSFI employees
- Managers and supervisors involved in hiring and onboarding employees, including persons with disabilities
- Managers who help, support, and enforce accessibility standards

3. Our progress

OSFI's [Accessibility Plan 2023-2026 \(/en/about-osfi/reports-publications/office-superintendent-financial-institutions-accessibility-plan-2023-2026\)](/en/about-osfi/reports-publications/office-superintendent-financial-institutions-accessibility-plan-2023-2026) has 16 actions, each with different timelines and numbers of steps needed to complete an action:

- 3 short-term actions: projected to be completed within 1 year
- 12 medium-term actions: estimated to take 1 to 3 years

- 1 long-term action: requiring 3 or more years to complete

In our first year of implementation, we made progress on all short-term actions and 11 of the 12 medium-term action items identified in the Accessibility Plan.

As we addressed the short-term actions throughout the first year, we learned that the associated barriers continue to evolve alongside our changing operating environment. As a result, we will continue to adapt these actions to respond to employee needs on an ongoing basis.

In navigating OSFI's first year of implementation, we also identified the need for a more robust governance structure to support our Accessibility Plan and to create an accessibility culture to set the foundation for our success.

4. Priority areas

The seven priority areas described under section 5 of the *Accessible Canada Act* (ACA) 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 includes the progress made within this area in 2023, new barriers that have been identified, and actions we plan to take to address each barrier.

4.1 Employment

No short-term actions to remove barriers were identified for this priority in our 2023-2026 Accessibility Plan, but progress was made in 2023 toward medium-term actions:

- OSFI continued to partner with organizations that support the hiring of people with disabilities such as LiveWorkPlay and the Federal Internship Program for Canadians with Disabilities.
- OSFI participated in a career fair for prospective candidates with disabilities. At this career fair, OSFI had conversations with students and recent graduates who have a disability and shared information about career options at OSFI.
- OSFI increased flexibility regarding accommodation during the hiring process and does not always require a medical note from candidates.
- OSFI continues to review its hiring practices through the lens of the Public Service Commission's [Fairness Review Checklist \(https://www.canada.ca/en/public-service-commission/services/public-service-hiring-guides/enhance-fairness-reduce-bias-assessment-tools.html\)](https://www.canada.ca/en/public-service-commission/services/public-service-hiring-guides/enhance-fairness-reduce-bias-assessment-tools.html).

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 The built environment

Activities completed in 2023 to support short-term actions to remove barriers

- The OSFI facilities team has been working to install individually controlled lighting systems in offices to address light sensitivity.

- OSFI has purchased a larger variety of chairs to support employees' diverse needs.
- The facilities team has been working with Human Resources (HR) to support accommodations for employees who require assigned seating due to the nature of their accommodation.
- OSFI's hybrid work model is designed to create a workplace that is safe, accessible, inclusive, and productive for all employees. OSFI updated its Hybrid Model Playbook which includes guidance on how to meet our duty to accommodate obligations in the implementation of our hybrid work model.
- OSFI developed its Directive on Telework and Guidelines on Hybrid Work, which will replace the Hybrid Model Playbook. Employees with a disability will be encouraged to document their workplace barriers and solutions using the GC Workplace Accessibility Passport.

Progress made in 2023 toward medium-term actions to remove barriers

- OSFI is creating a wellness room with special lighting at the Ottawa office that will be available to employees in 2024.
- The facilities team has been promoting the option of ergonomic assessments to employees. Actions to promote assessments have included increased communication at onboarding and offering on-site assessments at OSFI offices.
- To ensure the accessibility of the evacuation process, OSFI has started mandatory training for building emergency evacuation. This training includes a section on supporting employees with mobility impairments. There are also now floor wardens who are in-person employees designated to be in charge in emergency situations.

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 communications technologies (ICT)

Activities completed in 2023 to support short-term actions to remove barriers

- OSFI has collated a list of hardware, software, and training options that support employees with disabilities. This list was created to inform OSFI employees of the types of solutions that are available to them to address specific accessibility needs. A communique was prepared and is being reviewed for distribution in early 2024.

No new barriers were identified in 2023.

4.4 Communications other than ICT

No short-term actions to reduce barriers were identified for this priority, but progress was made in 2023 toward medium-term actions:

- Progress made in 2023: Using plain language makes information easy to find and readable for everyone. It makes OSFI's content more accessible and inclusive of those with cognitive disabilities such as attention deficit disorder, dyslexia, and memory loss. The OSFI communications team has employees with skills to support writing in plain language. These employees have experience in the development of accessible documents and are working to share their knowledge so that documents can be written accessibly.

- The OSFI external website has been redesigned with accessibility as a priority. We will share best practices to sustain and grow long-term accessibility.
- The updated OSFI external website that will be launched in January 2024 will include comprehensive ALT text, larger fonts, simplified layout, and plain language for improved accessibility.
- OSFI has started to offer American Sign Language (ASL) and Langue des signes québécoise (LSQ) interpretation at certain employee events. OSFI will increase the number of events where this is available.
- The Mental Health and Accessibility stream of the Inclusion Network has worked hard this year to raise awareness of accessibility and disability within the organization. During National Accessibility Awareness Week, the Inclusion Network hosted sharing circles on neurodiversity and released a blog post highlighting the lived experience of 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 The procurement of goods, services, and facilities

Activities completed in 2023 to support short-term actions to remove barriers

- The procurement team prioritized learning about accessibility and has grown their understanding of accessibility requirements within the procurement process.
- The procurement team has worked to help inform internal clients who do not include accessibility considerations as part of their procurement request.
- There has been an increased effort to provide accessible procurement documents and the team is committed to further supporting this moving forward.

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 The design and delivery of programs and services

No short-term actions to remove barriers were identified for this priority, but progress was made in 2023 toward medium-term actions:

- OSFI made significant improvements to the accessibility of our external-facing website. The website, which we will launch in January 2024, strives towards full accessibility. The next phase will look to apply accessibility best practices as provided by the Treasury Board of Canada Secretariat for different online formats, such as Microsoft Excel.
- OSFI worked hard this year to improve collaboration with our service delivery teams. This collaboration allowed us to share knowledge of accessibility best practices. We will be looking to develop a coordinated approach to accessibility in our service delivery in the coming years.

4.7 Transportation

No barriers were identified for this priority in the Accessibility Plan.

New accessibility barrier 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. Reporting and implementation

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

Throughout the report we recognize a trend regarding a lack of clarity on the accommodations process and roles and responsibilities. To address this gap, we will establish a governance structure by bringing the leads together in a working group with representation from employees with disabilities and senior leadership to support a more coordinated approach to implementing the accessibility plan.

The *Accessible Canada Act* mandates that annual progress reports be published to track progress on the implementation of the actions described in this progress report. OSFI is excited to continue to implement 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 consult 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 in this plan.

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

6. Feedback

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.

OSFI has prioritized feedback from our employees to help make this Progress Report relevant and actionable. We have used this feedback to identify new accessibility barriers and ways we can become more inclusive. The feedback we have collected this year has been reflected in the priority area sections of this progress report. In these sections, we have identified new barriers and ways we will address these barriers moving forward. OSFI has provided a detailed summary of the way we consulted employees in the Consultations section.

Date modified:

2023-12-21