



“Nothing Without Us”



FINTRAC’s accessibility plan – 2024 progress report

Table of contents

A message from the Employment Equity, Diversity and Inclusion Champion	3
General.....	4
Who we are and what we do.....	4
Feedback.....	5
Privacy statement	6
Call to action	7
Progress against planned activities to address identified barriers.....	7
Employment	7
The built environment	14
Progress against planned activities to address identified barriers.....	14
Information and communication technologies	16
Progress against planned activities to address identified barriers.....	17
Communication (other than information and communication technologies)	19
Progress against planned activities to address identified barriers.....	19
Progress against planned activities to address identified barriers.....	21
Design and delivery of programs and services	22
Progress against planned activities to address identified barriers.....	22
Transportation	23
Progress against planned activities to address identified barriers.....	23
Consultation.....	24
Feedback.....	24
Annex A – Managing the accessibility program.....	25
Governance.....	25
The employee network for persons with disabilities (ENDP)	25
Employment equity, diversity and inclusion (EEDI).....	26
Management advisory committee (MAC)	26
Executive committee (EXCO)	26
Annex B – Distribution of persons with disabilities by occupational group.....	26

A message from the Employment Equity, Diversity and Inclusion Champion

I am pleased to present FINTRAC's second progress report against our three-year Accessibility Plan. Our commitment to accessibility is a critical component of our broader anti-racism, equity, and inclusion initiative, as outlined in FINTRAC's Employment Equity, Diversity, and Inclusion (EEDI) strategy. Embracing diversity and inclusion is a cornerstone of FINTRAC's corporate commitment, and fundamental to the development of a modern and effective federal public service.

Our progress in the second year of implementing our Accessibility Plan underscore our dedication to setting the standard for accessibility and align with the Government of Canada's commitment to ensure that all Canadians can fully participate in society with unobstructed access to communities, workplaces, and services.

Significant progress has been made across the three pivotal themes of our plan – Culture, Build Knowledge, and Employee Experience:

Culture – Fostering an inclusive and diverse culture is an ongoing process of expanding awareness and implementing inclusive practices. While this report highlights various achievements, such as the adoption of inclusive hiring practices, it also focuses on the importance of ongoing education about the true essence of inclusivity and diversity. Our goal is to cultivate a workplace where all employees can better understand their biases and their impact.

Build knowledge – Enhancing our key enablers' understanding of what it means to be accessible has been met with unwavering commitment. A key takeaway from this second year is that, as an institution that values learning, expanding our knowledge of accessibility is not a one-time task, but a continuous journey of improvement.

Employee experience – We are focused on ensuring that employees have a positive and accessible experience from recruitment through their entire careers at FINTRAC. We have improved the onboarding process for new hires by refining communication and training resources; however, we recognize the need for continued improvement. There have been some delays in the implementation of the FINTRAC Accessibility Passport to ensure that our employees and management representatives feel equipped with a robust Duty to Accommodate directive and guidance. The upcoming phase one of the Passport will allow a small group of pilot participants to articulate their needs for a better work environment, including any necessary accommodations.

With the continued support of the Employee Network for Persons with Disabilities (ENDP) and other partners, FINTRAC will continue to attract top talent by removing barriers and striving to improve the workplace experience for people with disabilities.

Philippe Blanchette
Champion, Employment Equity, Diversity and Inclusion
Chief Human Resources Officer

General

Who we are and what we do

As Canada's financial intelligence unit and anti-money laundering and anti-terrorist financing regulator, FINTRAC plays a critical role in helping to combat money laundering, terrorism financing and threats to the security of Canada.

The Centre produces actionable financial intelligence in support of the money laundering and terrorism financing investigations of Canada's police, law enforcement and national security agencies. FINTRAC also generates valuable strategic financial intelligence, including specialized research reports and trends analysis, for regime partners and policy decision-makers, businesses and international counterparts that shines a light on the nature, scope and threat posed by money laundering and terrorism financing.

The Centre is able to fulfill its financial intelligence mandate by working with Canadian businesses to ensure compliance with the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (PCMLTFA). Compliance with the Act helps to prevent and deter criminals from using Canada's legitimate economy to launder the proceeds of their crimes or to finance terrorist activities. It also ensures that the Centre receives the information that it needs to produce financial intelligence for Canada's police, law enforcement and national security agencies.

FINTRAC's financial intelligence is in high demand internationally, as is its specialized intelligence and supervisory knowledge and expertise. The Centre is regularly asked to lead international conferences and workshops and to contribute to global research projects, training and bilateral and multilateral capacity-building initiatives.

In fulfilling its core financial intelligence and compliance mandates, FINTRAC is committed to safeguarding the information that it receives and discloses to Canada's police, law enforcement and national security agencies. The Centre understands that the protection of privacy is critical to maintaining Canadians' confidence in FINTRAC and Canada's broader Anti-Money Laundering and Anti-Terrorist Financing Regime.

Feedback

The Manager of Workplace Experience is the person responsible for receiving feedback on barriers and accessibility at FINTRAC.

To submit your comments, suggestions and questions on all matters relating to accessibility, barriers that you may have experienced while dealing with FINTRAC, or the implementation of the Accessibility Plan, you can contact us:

- By e-mail: Accessibility/Accessibilite@fintrac-canafe.gc.ca
- By telephone: 1-866-346-8722 (toll free)
- TTY (teletypewriter): 1 800-465-7735
- By mail:
Manager of Workplace Experience
People, Culture and Workplace Sector
FINTRAC
234 Laurier Avenue West
Ottawa Ontario K1P 1H7

Anonymous feedback can be provided by phone or by mail.

Please submit your request, using the contact information listed above, to receive this report in an alternate format, including in print, large print, braille, audio format or an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities.

When submitting feedback on the Accessibility Plan, the implementation of the Accessibility Plan or any barriers you may have experienced while dealing with FINTRAC, please describe your experiences and how they affected you, and any recommendations you may have for how barriers can be removed.

Please ensure to include your contact information when submitting your feedback using the contact information listed above. We will acknowledge receipt of your feedback, unless received anonymously, in the same manner as it was received. We may also contact you to gain a greater understanding of your feedback.

The person designated to receive feedback on behalf of FINTRAC, the Manager of Workplace Experience, will log your information and may share with other areas of FINTRAC or government to help them address the barrier(s). All feedback received will form part of an internal report to ensure responsible management of every comment and request received, and to inform upcoming Accessibility Plans and Progress Reports.

Privacy statement

The feedback you provide through this consultation will be kept confidential and will be used only for the purpose of gathering your suggestions. Your submission is voluntary and we recommend that you do not provide any personal information. If you provide personal information, it will be protected under the provisions of the *Privacy Act* and described in the [Personal Information Bank PSU 938 entitled "Outreach Activities"](#). Also, please note that the Government of Canada will not make individual submissions public, but maintains the right to report publicly on the aggregate results.

For more information on your rights related to the *Privacy Act* please contact FINTRAC's Access to Information and Privacy Office at atip-aiprp@fintrac-canafe.gc.ca.

Call to action

[FINTRAC's Accessibility Plan 2023–25](#) (the Plan) has identified three principal themes as a result of our preliminary self-evaluation and consultative efforts, which have shaped our first-ever Accessibility Plan. These themes are:

- Continue to build on our **culture** of inclusiveness and diversity through ongoing awareness campaigns to ensure that accessibility is given forefront consideration on everything we do, such as, in the way we communicate both externally and with our employees through verbal and written communication, and the development and the purchase of information technology.
- **Build knowledge** and internal subject matter expertise on accessibility in our key enabling functions, such as information technology, accommodation, and procurement.
- Carry that same rigor of commitment to accessibility when recruiting employees, to ensure active support of the **employee experience** from the first day on the job to the ongoing positive work opportunities and professional growth.

Progress against planned activities to address identified barriers

In 2024, the following progress has been made by the Centre against the three-year plan for each of the seven areas of focus:

Employment

In addition to the many achievements highlighted in the Plan published in December 2022, FINTRAC continues to make positive strides toward reducing barriers for the persons with disabilities community, as well as for all designated employment equity communities. The following are a few key highlights in the Employment pillar:

- The Centre is publishing a new and current corporate Duty to Accommodate directive to ensure clear roles and responsibilities for *all* individuals requiring appropriate accommodations receive them from the onset of the recruitment process through to their career journey with the agency.
- The Centre continues to capture employment equity data to inform strategic human resources planning through self-identification efforts, and ensures that this data is securely stored in its human resources information system. Self-identification information is used to inform the Centre's staffing plans, and to advance specific talent acquisition strategies for attracting and identifying diverse talent. Each sector within the Centre receives statistics on representation, and as necessary, develops actions to rectify any minor gaps in the inclusion of the designated employment equity groups.
- FINTRAC's Talent Management Program, which currently targets the leadership community (EX-01 minus 1 / EX-01 and above equivalent), focuses on building and sustaining excellence within the Centre by maximizing contributions and realizing the potential of employees. Development, growth, and retention of talent are the foundation of the program; this is

critical for meeting the Centre's current and prospective departmental goals. Integral to this process is the incorporation of employment equity data, which includes gender-based analysis and statistics on representation by level and talent placement. This data is crucial for strategic and deliberate decision-making in various areas of talent management, such as learning and development, recruitment, succession planning, and mobility strategies. A key aspect of these strategic decisions is aligning with the goals of the 50-30 Challenge. In March 2021, FINTRAC was one of the first public sector organizations to join [Innovation, Science and Economic Development Canada's 50-30 challenge](#) to improve access for women, racialized persons including Black Canadians, people who identify as 2SLGBTQIA+, persons living with disabilities, as well as First Nations, Inuit and Métis peoples to positions of influence and leadership on committees and in senior management. As part of the Centre's continued participation in the 50-30 challenge, opportunities to participate in committees and other corporate opportunities are strategically discussed to align with the goal to be reflective of the workforce's diversity.

A key component of the Talent Management Program is leadership development. In 2023–24 the Talent Management Program was enhanced to include the identification of High Potential (HIPO) employees. These leaders possess the ability, engagement, aspiration and agility to rise to and succeed in various roles with a variety of scope, complexity and impact with a focus on those who identify and are interested in leadership roles, specifically for women, racialized individuals including Black Canadians, LGBTQ2 people, those with disabilities, and First Nations, Inuit, and Métis peoples. With the right support and accelerated development, they should be ready for advancement within a specified timeframe. This identification process is a proactive measure to build a strong pipeline of talent equipped to lead FINTRAC amid an ever-changing landscape.

- The renewal of FINTRAC's People Management Framework led to the start of the FINTRAC External Assignment Program (FEAP). This new program is set up to let FINTRAC staff work on an ad hoc basis with other organizations. The idea is to keep our talent management flexible and to engage people with a variety of skills and experiences. The FEAP helps FINTRAC to stay open and adapt to different forms of talent. Additionally, the FEAP has allowed FINTRAC to partner with *With You With Me*, an organization focused on making a social impact. This external partner helps fill digital skill gaps by training people from groups that are not well represented in the job market, like Indigenous people, those with disabilities, and women in science, technology, engineering, and mathematics (STEM) careers. With the partnership of *With You With Me*, FINTRAC is able to find people who have a lot of potential for certain jobs and give them the specific training they need. This ensures that candidates are ready for their new jobs and can start successfully.

At FINTRAC, four entry-level positions were identified within the Information Management/Information Technology sector. In December 2023, two of the vacant positions were subsequently identified for the FINTRAC Accelerated Modernization team. Two of the candidates selected through *With You With Me* are completing a one-year assignment with the Centre – one of which has been extended for an additional year, and

the other has received an indeterminate offer. The Centre is currently on track to complete a total of five FEAPs through the *With You With Me* partnership.

Theme culture

Planned activity for barrier – Accessible Employment Forms. Leverage the implementation of the new Human Capital Management (HCM) system to make employment application forms accessible.

Accomplishments in 2024:

- ✓ FINTRAC implemented a new Human Capital Management system in 2023, and continued to learn and explore the numerous capabilities of the system. Much effort is being placed to review how to further integrate the HCM's capabilities to ensure that new business processes are taking into consideration and are accessible by default.

Our successful launch of Workday, the enterprise cloud application, allows us to continue to reduce the use of stand-alone forms in our various human resources activities. For instance, the agency no longer has a paper form for self-identification, as this has been integrated as part of our Workday onboarding process.

- ✓ Additionally, we continue our efforts to leverage Workday to support the creation of accessible, more detailed and updated employee profiles and skills bank, so that the Centre can more easily identify required expertise and competencies for new tasks, as well as internal job opportunities of all employees, including those with accessibility knowledge.

We remain committed in learning to make full use of the HCM capabilities, as we have barely scratched the surface of what the HCM can do for the Centre in automating some of our services that in turn will help make our processes more accessible and lessen the administrative burden.

Planned activity for barrier – Inclusive Hiring Practices. Through the delivery of the HR sub-delegation training and other events, such as Manager Forums, influence change with the internal hiring processes and practices (i.e., use of psychometric tools, address systemic barriers caused by interviews, other lessons from the Neurodiversity recruitment initiative) to ensure the recruitment and continued growth/development of employees with disabilities.

Accomplishments in 2024:

- ✓ Since the Centre's participation in the Neurodiversity Recruitment Pilot in 2021, FINTRAC continues to be committed to the Public Service goal of hiring 5,000 Persons with a Disability by 2025, as well as the annual goal established by the Treasury Board of Canada Secretariat. FINTRAC's known population of employees with a disability is based on self-identification, and as such, it remains a challenge to capture the Centre's true population, which is higher than what is currently known.

Improving self-identification efforts remains an ever important consideration in order to advance accessibility activities on all organizational fronts.

FINTRAC has established itself as a frontrunner in the hiring of Persons with Disabilities by engaging with external experts, while also expanding its own understanding of inclusive and accessible hiring practices. By collaborating with an external service provider, FINTRAC is enhancing its awareness of potential obstacles that candidates with disabilities might face during the hiring process. This collaboration has sparked a significant change in perspective, leading to improvements in how we recruit, evaluate, select, and welcome new employees. These changes are based on the adoption of best practices that aim to progress our recruitment efforts. Working with specialists in this area has offered substantial benefits, including the ability to transform our recruitment strategies to access this underutilized pool of talent, broaden and diversify our candidate pool, innovate and improve our recruitment and onboarding processes, raise awareness among our team about neurodiversity, and increase our capability to manage and benefit from a more diverse workforce.

- ✓ We take great pride in having been honoured with the Canadian HR Reporter's 5-Star Diversity & Inclusion 2024 Award, and being recognized for our continuous efforts and collaboration with the non-profit organization Specialisterne. As allies in a neurodiversity initiative, our joint endeavors have significantly advanced the hiring and retention of neurodivergent individuals, particularly those on the autism spectrum, in professional roles.
- ✓ As part of the mandatory Staffing and Talent Acquisition sub-delegation training at FINTRAC, managers are required to complete the Canada School of Public Service's course on *Inclusive Hiring Practices for a Diverse Workforce* (COR120). Additionally, the training includes a detailed module that educates managers on the principles of Employment Equity, Diversity, and Inclusion (EEDI). This module highlights the organization's commitment to promoting an equitable, diverse, and inclusive workforce. The training underscores the importance of adhering to EEDI practices in compliance with relevant legislation, such as the Employment Equity Act, and focuses on strategies for conducting inclusive and unbiased hiring processes.
- ✓ Managers learn how to integrate EEDI objectives into staffing strategies, which helps to either expand or refine the talent pool, bridge representation gaps, and enhance the organization's performance.

Furthermore, the module illustrates how embracing EEDI contributes to a positive workplace culture, fosters innovation, and reinforces FINTRAC's standing as an equitable employer. This commitment is essential for the Centre's operational excellence and the maintenance of public trust.

Planned activity for barrier – Language Matters – Training for Inclusive Communication.
Leverage and augment existing leadership training programs to increase awareness on

unconscious biases and the importance of language when communicating with all diversity groups, including persons with disabilities.

Accomplishments in 2024:

- ✓ FINTRAC has updated its strategy for Employment Equity, Diversity and Inclusion (EEDI) to better promote a workforce that reflects Canada's diverse population and to ensure diversity and inclusion are integral to the organization's decisions. The strategy is based on four main areas: talent acquisition and retention; professional growth; leadership and accountability; and, employee engagement. An important part of this strategy is making training on EEDI subjects a required part of FINTRAC's National Training Standards. With this mandatory learning over a three-year learning path in mind, the following required baseline courses were identified for all employees to nurture common knowledge and foster a culture of inclusion:
 - By March 31, 2024, employees were required to complete *Adopting an Inclusive Mindset at Work* (INC122) and *The Uncomfortable Truth* (IRA102). Also required was the completion of *Leading Diversity* (INC110) as an additional module for those in supervisory positions.
 - As part of the 2024–25 obligation, employees are required to complete two other courses, *Moving from Bias to inclusion* (INC123) addresses how to recognize unconscious biases, and *Reflecting on Cultural Bias – Indigenous Perspectives* (IRA101) which focuses on better understanding cultural bias placed on First Nations, Métis and Inuit peoples.

The Centre's HCM system incorporates automation features to monitor the completion of mandatory courses, ensuring that employees complete their training in accordance with the prescribed sequence and schedule.

Theme build knowledge

Planned activity for barrier – Increase Internal Accessibility Subject Matter Knowledge. To support hiring managers, our human resources (HR) community will focus on gaining a greater understanding on what it truly means for its programs to be accessible. This will support efforts to provide better guidance, enhance tools, and further enhance the people management policy suite.

Accomplishments in 2024:

- ✓ Recognizing the importance of ongoing education, FINTRAC initiated the rollout of a comprehensive five-part series focused on neurodiversity education in partnership with Specialisterne. Each educational session was structured with clear learning objectives, actionable takeaways, and opportunities for practical application, ensuring that participants could translate their learning into meaningful action within the workplace. The Centre had rolled out two of the three parts in the series

in 2023 on the following topics: Introduction to Workplace Inclusion, and Neurodiversity 101. Since then, three additional learning sessions were delivered that were widely attended and well received as being both instructive and inspiring:

- Part 1, April 2024 – Disclosure and Workplace Accommodation (employee participation was not tracked in the French and English sessions)
- Part 2, May 2024 – Inclusive Career Development and Advancement (24 participants in the French session; 64 in the English session)
- Part 3, September 2024 – Creating an Inclusive Onboarding (25 participants in the French session; 84 in the English session)

Theme employee experience

Planned activity for barrier – Accessibility Passport. Create a means by which persons with disabilities can easily communicate their needs with their supervisors.

Accomplishments in 2024:

- ✓ The Office of Public Service Accessibility has developed the Accessibility Passport using a social model for disability rather than the medical model of disability, which focused on the individual's limitations. This innovative approach is being implemented throughout the federal public service, and consistent with this adoption, FINTRAC is fully committed as a small agency in a High Security Organization community to integrating a variation of this method into our accommodation practices. The goal is to encourage open dialogue about the barriers faced by employees with accommodation needs and to foster a culture where employees are empowered to take the lead in identifying the solutions they need to thrive professionally.

Previous consultations with the Employees Network of Persons with Disabilities (ENDP) and the Employment Equity, Diversity and Inclusion (EEDI) working groups had provided meaningful suggestions for the program and related tools design. Enablers continued to work together, especially including the IT group, who have been a part of discussions on customizing templates and other available resources to make the Passport implementation process a clear and simple one.

Moreover, to ensure a successful adoption of the FINTRAC Accessibility Passport, implementation is being deliberately aligned with the publication of the Centre's Duty to Accommodate directive. This directive is a necessary policy instrument that ensures a clear and transparent process for all employees, with clearly established roles and responsibilities. Numerous discussions were held between the two initiatives, as the Accessibility Passport is the recommended tool to streamline the duty to accommodate process and document decisions.

- ✓ With the Duty to Accommodate directive alignment, FINTRAC initiated phase 1 of its Accessibility Passport in November 2024, with the participation of six sets of employee volunteers and their respective supervisors. The participants of phase 1 will engage in critical journey mapping discussions that will refine the process and ensure that the tools are both effective and pertinent prior to progressing with phase 2 of implementation.

The efficiency and usefulness of the Accessibility Passport are contingent upon fostering an environment of trust and confidentiality among employees. We are assimilating insights from the roll-out of analogous programs and policies, recognizing that a measured approach coupled with a critical educational element is paramount in upholding compassionate and respectful ways to discuss accommodation. To facilitate these discussions, supervisors will be equipped with comprehensive training that includes targeted coaching and a structured approach to change management.

Planned activity for barrier – Onboarding of New Employees. Ensure active support of employees on their journey of becoming a FINTRAC employee through the introduction of a new Onboarding Buddy model, streamlining communication, ensuring accessible training material and ensuring appropriate occupational health and safety measures are in place.

Accomplishments in 2024:

- ✓ A new Onboarding Buddy model will pair new hires who self-declare as a Person with a Disability with an experienced equity-seeking employee in order to foster a sense of safety and inclusion from their very first day. At the conclusion of the Onboarding Buddy pilot, the success of this program will be assessed and may expand to provide a “buddy” to new hires from other employment equity and equity-seeking groups.

In our pursuit of best practices for inclusive onboarding, the Centre has engaged in a series of educational activities. This included training facilitated by a specialized third-party service provider and extended to all employees. The training was centred on fostering an inclusive onboarding experience and equipping staff with the necessary skills to support new colleagues effectively.

- ✓ The initiative is now in a consultative phase, where we are seeking input from our internal employee networks and enablers. This consultation is critical to understanding the unique needs of our employees and to ensure that the Onboarding Buddy program is both supportive and empowering. The insights obtained from these discussions will be instrumental in shaping the model of the program.

In terms of next steps, the feedback from these consultations will inform the creation of tailored business processes and the development of tools to support the Onboarding Buddy program. The Centre is dedicated to establishing a model that is reflective of our organizational values and is responsive to the needs of our employees with disabilities.

The built environment

FINTRAC operates out of four locations, with regional offices situated in Toronto, Montreal, and Vancouver, and the main office located in Ottawa. At these sites, FINTRAC occupies space within buildings leased through arrangements managed by Public Services and Procurement Canada (PSPC), which include compliance with standard base-building codes.

In the past few years, PSPC has successfully concluded negotiations for new leases for the Toronto and Montreal offices, resulting in upgrades to the physical premises and office furnishings to enhance accessibility features. More recently, PSPC concluded the renegotiation of the lease for the Ottawa headquarters, which incorporated improvements to accessibility in response to code revisions enacted in 2020. Consequently, upgrades to increase accessibility in shared spaces such as kitchens, restrooms, and doorways are planned for the upcoming years.

FINTRAC is committed to prioritizing accessibility in the modernization of our leased spaces. The Employee Network for Persons with Disabilities (ENPD) had previously highlighted the necessity for white noise features and specific accommodation measures. Additionally, in alignment with FINTRAC's ongoing initiative to facilitate a hybrid work model, the strategy for returning to the office includes the provision of sit/stand desks within each newly established 'neighbourhood' area across the office floors, catering especially to those staff members who require such accommodations.

Progress against planned activities to address identified barriers

Theme culture

Planned activity for barrier – Access to Quiet Spaces. Build awareness on purpose and proper use of focus rooms, and implement a monitoring process on its use to ensure accessibility to those who need them.

Accomplishments in 2024:

- ✓ FINTRAC continues its efforts to progressively transition from a conventional assigned seating arrangement to a more dynamic workspace model that accommodates flexibility that is tailored to the specific requirements of the task or function at hand. Consequently, employees who come onsite may find that their workspace needs vary throughout the day. They might require a larger area for collaborative work with colleagues, a quiet space for concentration-intensive tasks,

access to boardrooms for meetings, or a standard workstation for regular duties. With the implementation of the new FINTRAC Hybrid Model over the summer months, a significant amount of planning and communication took place to ensure the effective use of quiet spaces, including “focus rooms”. Communication to management teams, all staff messages and signage were used to ensure that employees with needs are aware of these accessible spaces and the booking mechanisms.

- ✓ In the spirit of providing an increased number of quiet spaces to conduct quiet work activities, including for those struggling with sensory overload, FINTRAC added three “study rooms” (for a total of 9 workstations) to promote quiet, focused work space.
- ✓ Furthermore, the Centre has once again engaged in targeted communication with the management community to encourage the appropriate utilization of focus rooms and to ensure equitable access for all employees. Signs have now been placed in focus rooms as a reminder for employees to reserve these spaces as required, especially for accessibility needs.
- ✓ The implementation of the Centre’s new Hybrid model gave us the opportunity to conduct more targeted communication with the Management community, as well as with employees on the proper use of and equal access to quiet spaces and focus rooms by all staff.
- ✓ Guidance on the proper use of a focus room continued to be promoted. All focus rooms are now equipped with signage that reminds employees to book these spaces appropriately and in line with our Boardroom Etiquette principle, so as to ensure the use of proper sized rooms for the activity in question in order to optimize the use of limited space needed by others.

Theme build knowledge

Planned activity for barrier – Increase Internal Accessibility Subject Matter Expertise. Conduct an internal review of FINTRAC's built environment to gain a greater understanding, and to identify where accessibility gaps may exist. Engage ENPD members throughout the review process.

Accomplishments in 2024:

- ✓ An accessibility review of the HQ location was completed by the PSPC Office of the Accessibility of the Built Environment.

The report assessed the compliance with the Implementation Requirements of the Standard on Barrier-Free Access to Real Property (SBRP) and the CAN/CSA-B651-23 Accessible Design for Built Environment Standard (ADBES), the mandatory technical standard for accessibility under the SBRP.

The areas assessed include:

- Building site features/accessible routes
- Parking
- Building entrances
- Vertical movements
- Doors and corridors
- Washrooms
- Drinking fountains
- Communications (signage)
- Common and public spaces
- Interior rooms (tenant)

- ✓ The report concludes existing compliance with *CAN/CSA B651-23* to be very high (81%), and suggests some modifications to improve compliance. These will be completed with timelines determined by the building owner.

Examples include:

- Install additional lower power door controls for the main building entrance on the ground floor
- Install new shelf for the majority of the accessible universal washrooms
- Install new power door operators and controls for some accessible universal washrooms

- ✓ The work to complete the review and subsequent internal briefings led to improved internal subject matter expertise.

Information and communication technologies

A commitment to building a culture of inclusiveness and diversity is a priority for the Information Management/Information Technology (IM/IT) sector. We have made strides in educating our employees and challenging their biases through programs and informational sessions organized by various enabling functions.

IM/IT has been utilizing these educational efforts as a foundation to further drive cultural change by prioritizing accessibility in the development of Information and Communication Technologies (ICTs). Since our previous report, we have made significant progress by integrating accessibility criteria into the procurement and development of digital tools and applications at FINTRAC. We have provided specific examples under each thematic area below to illustrate this progress.

Moving forward, IM/IT will continue to prioritize investments in ICTs that incorporate accessibility from the outset. This approach is a fundamental aspect of our agile development

process, especially when setting standards and formulating new business processes. Building upon our existing foundation, FINTRAC will persist in educating and communicating the importance of accessibility, engaging with the Employees Network of Persons with Disabilities (ENDP), and consulting other accessibility experts to contribute to the Government of Canada's broader objectives.

Progress against planned activities to address identified barriers

Theme culture

Planned activity for barrier – Accessibility at the Forefront of Standards and Business Processes. Experiment with a newly developed open source web development toolkit that enables the Centre to build highly accessible applications that will improve the accessibility in technology.

Accomplishments in 2024:

- ✓ IM/IT has continued to evolve our culture by incorporating user experience (UX) design methodologies in application development. This approach includes designing for individuals with and without disabilities and is informed by user feedback. The Centre expects this practice to further develop throughout 2024–25 and future years.
- ✓ By adopting our open-source web development toolkit, we developed a new search tool called WISE. Building on the accessibility features of the previous tool MARS, WISE offers an accessible user interface in a Protected B Azure Cloud environment, maintaining comparable functionality for business users.
- ✓ FINTRAC has met 95% of the accessibility standards respecting its public facing website (Internet), documents, forms and applications. In fact, the Centre is 100% compliant with accessibility standards for two GCforms that have been implemented.
- ✓ In terms of the Centre's Intranet site, applications and multiple forms (internal use only), IM/IT has met the accessibility standards in the following manner:
 - Fintranet: 80%
 - Nemo application: 85%
 - Compliance Corner site: 85%
 - MSB registration site: 90%
- ✓ FINTRAC acknowledges that some Legacy applications have not been compliant with Legacy Standards. Moving forward, all new internally developed tools are to be aligned with the Accessibility Standards. (75% Legacy, 25% new).

Planned activity for barrier – Accessible IM/IT Procurement. Develop processes and tools that include accessibility requirements at the forefront of all IM/IT procurement activities.

Accomplishments in 2024:

- ✓ Aligned with the Centre's procurement program's efforts, the use of an accessibility requirements form in all IM/IT procurement activities has been ongoing in 2024, ensuring that all acquisitions support our commitment to inclusivity.

Theme build knowledge

Planned activity for barrier – Increase Internal Accessibility Subject Matter Expertise. IM/IT employees will increase their knowledge on accessibility by assessing their respective business processes and tools with an accessibility lens. Where gaps have been identified, they will begin to implement improvements where appropriate.

Accomplishments in 2024:

- ✓ IMIT management has advocated for employee participation in sessions hosted by our enabling partners, such as "A Day in the Life of a Person with a Disability," "Making Documents Accessible," and "Introduction to Workplace Inclusion," to enhance our understanding and apply an accessibility perspective to our processes and tools.
- ✓ Managers are now engage in proactive discussions about accessibility needs before the commencement of employment for all new hires.
- ✓ Plans to modify the onboarding process are underway, with implementation expected in 2024–25.
- ✓ Business Analysts are gaining knowledge crucial for integrating accessibility features into future product releases.

Additionally, in 2024, FINTRAC has continued to focus on technology modernization with an emphasis on user-centric design, which inherently supports accessibility. Our development processes ensure that digital products cater to the needs of all users, including those with disabilities. We embed accessibility features and automated testing into our development workflows, aligning with FINTRAC coding standards and the Web Content Accessibility Guidelines (WCAG) 2.1 from inception.

The Centre has also explored the use of Artificial Intelligence (AI) to bolster our accessibility initiatives. Our GenAI Assistant tool, created with accessibility at its core, was introduced to a beta test group in 2024. The tool offers customizable Assistants to meet diverse user requirements, with the generated content incorporating accessibility considerations. For instance, the JavaScript Developer Assistant produces code compliant with WCAG 2.1 guidelines. The Centre is actively testing new Assistants with users to identify how they can help overcome barriers and facilitate content creation,

including plain language assistants to aid users with cognitive disabilities or language barriers.

As we innovate with AI, we ensure that our digital modernization efforts are inclusive and do not perpetuate bias. Our commitment to integrating Gender-Based Analysis Plus (GBA+) and responsible AI will continue to steer FINTRAC toward delivering equitable, user-centric digital solutions.

Theme employee experience

Planned activity for barrier – Access to Wireless Peripherals.

Access to Wireless Peripherals: As a high-security organization, wireless peripherals are generally restricted within FINTRAC. However, the organization has agreed to reassess each new tool, using a risk-based approach for discussions by the IM/IT Security Committee on potential opportunities.

Accomplishments in 2024:

- ✓ The IM/IT Security Committee has engaged in discussions regarding wireless technology for IT peripherals such as keyboards and mice. While accommodations are possible, wireless technology introduces new security risks. Consequently, IM/IT is carefully reviewing requests for specialized equipment and providing recommendations based on approved devices and the employee's work location (home or office).

Communication (other than information and communication technologies)

FINTRAC recognizes the importance of corporate communication activities (i.e., written and oral) to influence positive change where persons with disabilities can fully participate as integral members. One of the primary function of internal communications is to inform employees on our core values, which includes accessibility. We will continue to apply the principles of accessibility, diversity, and inclusive communication when corresponding externally as per the Government of Canada Communications Policy, as well as the Standard on Web Accessibility.

Progress against planned activities to address identified barriers

Theme culture

Planned activity for barrier – Communication Tip Sheet. Build on existing knowledge by conducting additional research on best practices in developing accessible written communication. Develop tip sheets on making internal and external products, activities and events accessible.

Accomplishments in 2024:

- ✓ The Centre developed a 'Tip Sheet' that referenced tools and communication materials provided by the Office of Public Service Accessibility and other trusted sources to serve as a how-to guide for accessible communication. Using this document, the Centre regularly posted monthly *Accessibility Tips* on the intranet homepage image carousel (also known as "sliders". These monthly accessibility awareness tips were endorsed by the Centre's ENPD community as being easy-to-read information with quick links to the original source of information from the web. The entire tip sheet is also available on the intranet site for on-demand access by employees.
- ✓ More specifically, since March 2024, the Centre posted 11 intranet sliders, each linking to information on the topics that encouraged employees to be more aware of accessibility tools:
 1. Use of the Web Content Accessibility Guidelines to level **complex colour contrast** ratio so that all employees can access the document;
 2. Use **accessible language** to create a healthier and more inclusive work environment for everyone;
 3. **Closed captions or subtitles** can be added to PowerPoint presentations to make them more accessible for individuals who are deaf or hard of hearing;
 4. **Transcripts for audio and video files** can also be embedded in PowerPoint presentations to make them more accessible to users who are deaf or hard of hearing;
 5. Microsoft Word has a built-in **accessibility checker** that identifies potential problems in documents and provides recommendations for fixing them;
 6. **Adding bookmarks** to a Word document can help users quickly navigate to specific sections, making the document more accessible and easier to use;
 7. Make PowerPoint slides accessible for **screen readers**;
 8. Enable **closed captioning for MS Teams** meetings;
 9. **Adjust complex tables** as they can be difficult for screen readers to navigate through the correct order (3);
 10. Best practice to **align all text to the left**, not the centre or to the right (6); and,
 11. Microsoft has an **accessibility checker** (which works like spell checker) built into many of its products, including Word, PowerPoint, and Excel (7).

Procurement of goods, services and facilities

Accessible procurement focuses on recognizing potential barriers to accessibility and determining how conditions can be tailored to accommodate a diverse array of users. To further its commitment to inclusive procurement, FINTRAC will continue to work with Public Services and Procurement Canada (PSPC), the authority on procurement matters, to foster

awareness and assist in the development of procedures, tools, and the enhancement of expertise in accessible procurement practices.

Progress against planned activities to address identified barriers

Theme culture

Planned activity for barrier – Increase Client Knowledge. Provide information sessions to clients on what it means to build accessibility into their procurement requirements at the forefront.

Accomplishments in 2024:

- ✓ The Centre’s Procurement Office continues to prominently promote its Accessible Procurement implementation efforts in ensuring its learning material continues to play a key role in supporting a shift in culture across the Centre.
- ✓ A mandatory Accessibility Checklist was created to be submitted with every business owner’s Procurement Package that initiates a procurement process. This checklist includes questions for the business owners on where and how to include accessibility in their procurement (e.g., standards, requirements, evaluation criteria, etc.).

The Checklist ensures that consideration is systematically given on accessibility in the individual procurement requests and that it is duly completed, and where accessibility cannot be completed (i.e., questions 3-13 are all “no” or “N/A”), business owners must subsequently complete the Accessible Procurement Justification Form.

- ✓ Procurement officers have received training and serve as a challenge function where business owners indicate that accessibility is not included in their procurement request.
- ✓ At the time of reporting four learning events took place and well attended by employees from across the Centre. All learning events contained significant information on accessible procurement as part of client engagements efforts.

Theme build knowledge

Planned activity for barrier – Increase Internal Accessibility Subject Matter Expertise. Increase the internal knowledge of Procurement Officers through a number of different activities including attending information sessions, training courses, staying current on policy changes, and leverage best practices where possible.

Accomplishments in 2024:

- ✓ To enhance internal accessibility expertise and familiarity, it was mandatory for the Centre’s procurement officers to enroll in courses that prioritize accessible procurement practices. This strategic upskilling ensures that the procurement team is adequately prepared to collaborate with sectors and high end-users of procurement activities, such as the IMIT sector, to prioritize accessibility in all relevant acquisitions.
- ✓ To date in 2024, 100% of procurement officers have attended various information sessions hosted by CSPS, SSC and PSPC. Full-time Procurement Officers dedicated on average 14 hours of training related to Accessibility this year.
- ✓ SSC’s session on *How to Consider and Integrate Accessibility in Procurement* was also shared with the management community as they are typically the business owners in the procurement process, and can benefit from this learning and awareness.

Design and delivery of programs and services

FINTRAC's operations differ from many government entities in that it does not provide direct services to the Canadian public. Nonetheless, the agency plays a critical role in executing its mandate to detect, prevent, and deter money laundering and terrorist financing activities, all the while safeguarding the personal information it oversees, and it does so by engaging with two key stakeholder groups to fulfill this mandate:

- FINTRAC provides financial intelligence to police, law enforcement, and national security agencies; and,
- FINTRAC oversees regulatory compliance for Canadian businesses (i.e., reporting entities) obligated to report financial transactions, including banks, credit unions, money service businesses, casinos, real estate companies, British Columbia notaries, mortgage lenders, armoured car operations, dealers of precious metals and stones, securities dealers, accountants, and others.

Progress against planned activities to address identified barriers

Theme culture

Planned activity for barrier – Consultation with External Stakeholders. FINTRAC will undertake a consultation process with the Centre’s two stakeholder groups to assess where accessibility gaps may exist and ensure accessibility is at the forefront of all program and services design of processes and tools.

Accomplishments in 2024:

- ✓ The Accessibility Lead engaged with the law enforcement stakeholder group who receive financial intelligence in October 2023, and consulted with a person with disabilities who expressed that they were pleased and satisfied with products and

format of documents received from FINTRAC and could not think of other accessibility barriers for the Centre to address.

Subsequent to the outreach with the law enforcement stakeholders, the Accessibility Lead reached out additionally to key associations within three reporting entity groups to promote awareness of accessibility efforts at FINTRAC. FINTRAC met with senior officers at each of the three associations, who in turn agreed to initiate a wide distribution of a call-out letter to members of each association. Reporting entity members were asked to contact the Accessibility Lead directly should they be open to conduct a short survey. To date, no reporting entities have stepped forward, but the call-out letter in itself provided accessibility information and promoted FINTRAC's accessibility awareness efforts.

The following three key reporting entity associations were consulted:

- Canadian Bankers Association (May 2024)
 - Canadian Money Services Businesses Association (June 2024)
 - Central Credit Union Association (August 2024).
- ✓ FINTRAC launched a new initiative in October 2024 coined *A Day in the Life of Persons with Disabilities*. This series of one-hour sessions features external speakers with a disability to share transparent and candid accounts of personal lived experiences as public service employees. The first guest speaker was an employee from PSPC who spoke openly about his hearing impairment brought about by his battle with cancer. He recounted the challenges he had both as a patient during a pandemic, as well as the barriers he continues to encounter in the workplace.
- ✓ The session was well-attended (approximately 50 participants) and spawned interest in continuing the series in the new year.

Transportation

Although the Transportation pillar does not apply to FINTRAC's operations, we will nevertheless actively participate in any activities that will influence and remove transportation barriers for persons with disabilities, if called upon. In the absence of having any transportation responsibilities, such as fleet management, our influence is more about ensuring accessible transportation when organizing events, endorsing events organized by others, or when employees must travel for work.

Progress against planned activities to address identified barriers

Theme culture

Planned activity for barrier – Accessibility when Traveling. Consider accessibility at the forefront when planning travel and selecting events that are accessibility friendly.

Accomplishments in 2024:

- ✓ FINTRAC prioritizes accessibility in the planning and execution of all employee events, both internal and external, to mitigate the creation of barriers.
- ✓ The launch of the FINTRAC Accessibility Passport enables employees to communicate their specific accessibility requirements, ensuring these needs are accommodated during their participation in internal or external events and associated travel.
- ✓ Furthermore, the introduction of the Centre's Passport also heightens supervisors' awareness, prompting them to take additional steps to support employees with disabilities at external events and operational activities (e.g., supervision assessments conducted at reporting entity premises). This includes providing taxi vouchers, designating a Travel Buddy for local functions, and offering access to event recordings and notes.

Planned activity for barrier – Accessibility when equipment transportation is required. Consider accessibility at the forefront when planning for the provision of work tools and flexible work arrangements.

Accomplishments in 2024:

- ✓ FINTRAC employees with a disability will be provided with onboarding work equipment transportation that includes an ergonomic office chair, a large monitor computer screen, a laptop, keyboard and mouse.

Consultation

The Employee Network for Persons with Disabilities (ENPD) membership consists of volunteers who responded to the call to help 'make a difference to create a barrier-free workplace'. There is representation of persons with physical, cognitive and learning disabilities with a number of different barrier types that hinders their ability to fully and equally participate in society.

FINTRAC's Employee Network for Persons with Disabilities remains active, and continues to be a beneficial collaboration. The quality of insights and interest provided by this group has influenced the work environment meaningfully for the Centre as a whole. The established frequency of holding at least four meetings annually was maintained in order to solicit input on various elements of the Accessibility Plan commitments, as well as Centre-wide accessibility events.

Feedback

As mentioned previously, unlike many other government departments and agencies, FINTRAC does not offer direct service delivery to Canadians. As well, with our focused mandate and high security profile, there are only two stakeholder groups with which the Centre interacts, they are:

1. FINTRAC provides financial intelligence to police, law enforcement and national security agencies. The products we provide to this group are specialized and, in some cases, uses specialized technology.

The engagement with this group was to determine if there are any barriers that could be eliminated that would ensure persons with disabilities are able to work with FINTRAC's product and are able to access information effectively. As well, we solicited any additional feedback on accessibility. From the call-out, one law enforcement agency did agree to a discussion with the Centre. The nature of the feedback provided was more to validate that the work already done by FINTRAC to improve some of our products was meaningful and no additional barriers were identified to date as needing attention. On this, FINTRAC received very positive feedback.

2. FINTRAC regulates Canadian businesses who are required to report financial transactions, including banks, casinos, real estate firms, and money services businesses. FINTRAC works with these reporting entities to ensure compliance with legislation and associated regulations, to ensure the Centre receives the required financial transactions reporting that it needs to produce financial intelligence for Canada's police, law enforcement and national security agencies.

Consultations with three business associations within the banking, money services business, and credit union sectors were held, and association members were invited to participate in FINTRAC's accessibility survey on a volunteer basis. To date, the Centre did not receive any feedback from the associations' membership; however, regular monitoring will continue.

Annex A – Managing the accessibility program

Governance

The employee network for persons with disabilities (ENPD)

The ENPD has a key role in helping our organization to identify barriers to accessibility, actions we can take to remove these, and validate where we may already be on the right track for continued progress. Valuable input from this ENPD will inform FINTRAC's multi-year accessibility plan renewable every three years.

In addition to being consulted as the plan is developed, the ENPD will be part of the monitoring and reporting process to track progress on actions contained in the accessibility plan to ensure its intended objectives are being met.

For its initial years, there will be quarterly touch points with the ENPD to engage in an open dialogue on any new, materializing or existing barriers the Centre should address to meet its

targeted barrier-free culture at the Centre. Overtime, it is expected that the frequency of touch points will be adjusted in accordance to the needs but will never be less than two meetings per year – mid-year and year-end.

Employment equity, diversity and inclusion (EEDI)

The EEDI Champion and Working Group are in place to support the Executive Committee (EXCO) in providing leadership in this domain. The Working Group is dedicated to increasing employee awareness, co-developing initiatives, modernizing current programs and policies, and reshaping organizational norms in collaboration with the EEDI Champion who is an EXCO member.

To support the ongoing management of this important Accessibility file with the continuous support from the ENPD, Accessibility is now a regular agenda item on the Centre's high functioning and active EEDI Working Group. This will ensure the continuous alignment with other EEDI initiatives and leverage the power of this working group to advance the Accessibility Plan.

Management advisory committee (MAC)

A senior management level committee, MAC supports EXCO in fulfilling its mandate by providing strategic advice and recommendations on issues, risks and opportunities for the sound management of programs, policies, processes and systems that sustains FINTRAC's business operations, as well as for key investments, priorities and policy development initiatives to advance FINTRAC's change agenda.

MAC will receive updates on the progress of the Accessibility Plan and will be called upon to support and address any barriers that may arise through the implementation of the plan. At a minimum, MAC's strategic advice and recommendations will be sought on the content of the Accessibility Plan and its annual progress reports.

Executive committee (EXCO)

EXCO is FINTRAC's most senior level committee and provides strategic vision and direction, establishes strategic priorities, provides oversight and guidance on programs and horizontal activities, and ensures the essential conditions—internal coherence, corporate discipline and accountabilities—are in place to deliver effective results. They are the approving body for the Accessibility Plan and annual progress reports.

Annex B – Distribution of persons with disabilities by occupational group

As reported in the Annual Report 2023–24

Employment Equity Occupational Group March 31, 2024	Total employees	FINTRAC Representation Persons with Disabilities		Workforce availability (WFA)	
	#	#	%	#	%
Senior managers, middle and other managers	117	*	*	5	4.7
Professionals	257	25	9.7	23	9.1
Semi-professionals and technicians	68	*	*	4	6.4
Administrative and senior clerical personnel	57	5	8.8	5	9.4
Intermediate sales and service personnel	14	*	*	1	10.5

Adapted from Statistics Canada, 2016 Census and 2017 Canadian Survey on Disability for occupational groups used at FINTRAC.
*Data is suppressed to protect confidentiality of information and/or when the representation number was three or less.