

# Canadian Commercial Corporation (CCC)

## Accessibility Plan

### Effective 31 December 2022

This version of this document conforms to all applicable EN 301 549, WCAG 2.0/WCAG 2.1 Level A and Level AA guidelines for accessible digital documents. We always strive for plain language; however, we provide a simplified summary upon request because we cannot always write about policy and regulations in simple language without losing critical meaning. For alternative formats, please contact CCC at [info@ccc.ca](mailto:info@ccc.ca) or +1.613.996.0034

# Table of Contents

General	4
Contact	4
Feedback process	5
Accessibility statement	6
Leads for the 7 pillars	7
Employment	8
Commitment	8
Recruitment	8
Barriers, issues, and actions for this pillar	9
Built environment	16
Commitment	16
Barriers, issues, and actions for this pillar	16
Information and communication technologies (“ICT”)	19
Commitment	19
Barriers, issues, and actions for this pillar	19
Communication, other than ICT	22
Commitment	22
Feedback	22
Barriers, issues, and actions for this pillar	23
Procurement of goods, services, and facilities	28
Commitment	28
Barriers, issues, and actions for this pillar	28
Design and delivery of programs and services	29
Commitment	29
Barriers, issues, and actions for this pillar	29
Transportation	31

Commitment	31
Consultations	32
Workforce consultation	32
Client consultation	32
Training	33
Glossary	34
Accessible Canada Act (Section 2)	34
Canadian Human Rights Act (Section 25)	34
Employment Equity Act (Section 3)	34
Canadian Charter of Rights and Freedoms	35
United Nations Convention on the Rights of Persons with Disabilities	35

## General

This Accessibility Plan (“Plan”) outlines the strategy of Canadian Commercial Corporation (CCC) for preventing and removing barriers to address in response to the current requirements of the *Accessible Canada Regulations* to the *Accessible Canada Act*, as well as to fulfill CCC’s commitments as outlined in its own accessibility policies.

This is a multi-year, results-based plan consisting of the priority areas for action, desired results, and targeted activities to achieve them. The Accessibility Plan identifies leads, partners, timelines, and specific activities through 2025 and will be updated annually.

## Contact

Anyone wishing to provide feedback on the Plan or request a copy of the Plan in an alternative accessible format should contact Valerie Bellemare, Director of Human Resources.

By email: [vbellemare@ccc.ca](mailto:vbellemare@ccc.ca)

By phone: **343.541.8061**

By mail: **350 Albert Street, Suite 700, Ottawa, Ontario K1A 0S6**

## Feedback process

As prescribed by the Accessible Canada Act and/or its regulations, CCC has established a process for receiving and addressing feedback regarding implementing this Accessibility Plan and barriers experienced by our employees and people who interact with our organization.

Our feedback process is designed to facilitate the provision of anonymous feedback both internally and externally:

- This Accessibility Plan is published on CCC's public-facing website.
- The designated person for receiving feedback is Valerie Bellemare <[ybellemare@ccc.ca](mailto:ybellemare@ccc.ca)>.

## **Accessibility statement**

CCC is committed to providing a barrier-free environment and to meeting the accessibility needs of persons with disabilities in a timely manner. As an organization, we recognize our responsibility to ensure a safe, dignified, and welcoming environment for everyone, including our clients, customers, job applicants, workforce, suppliers, and visitors who enter our offices, use our services or access our information.

CCC is committed to ensuring compliance by incorporating accessibility legislation into our training programs, requirements, policies, procedures, equipment, and best practices.

This Plan adheres to the objectives outlined in the Accessible Canada Act and its associated regulations and standards, as applicable to CCC.

## Leads for the 7 pillars

As the identified pillar leads, the CCC business units below will own both the responsibility and accountability for the development and implementation of the actions with each of the 7 pillars required by an Accessibility Plan:

1. **Employment:** HR and others as identified in this Accessibility Plan
2. **Built environment:** Property Management and others as identified in this Accessibility Plan
3. **Communication technology and information management (ICT):** Information Technology and Information Management and others as identified in this Accessibility Plan
4. **Communication (other than ICT):** HR and others as identified in the Accessibility Plan
5. **Procurement of goods, services, and facilities:** Procurement and Contracting and others as identified in the Accessibility Plan
6. **Design and delivery of services and programs:** Various, as identified in this Accessibility Plan
7. **Transportation:** not applicable for CCC

# Employment

## Commitment

CCC is committed to fair and accessible employment practices. CCC has consulted with people with disabilities (PWD) and will continue to do so to determine their employment-related accessibility needs.

## Recruitment

CCC has hereby notified the public and staff that, when requested, CCC accommodates people with disabilities during the recruitment and assessment process and once individuals are hired.

- CCC HR reviews and modifies, as necessary, existing recruitment policies, procedures, and processes.
- On its website and job postings, CCC specifies that accommodation is available for applicants with disabilities.
- CCC notifies job applicants when they are individually selected to participate in an assessment or selection process, and that accommodations are available upon request concerning the materials or processes to be used in any assessment or selection process.
- If an applicant requests accommodation, CCC HR consults with the applicant and arranges for suitable accommodation in a manner that takes into account the applicant's individual accessibility needs.
- CCC includes information about accommodation policies in offers of employment and provides newly hired employees with copies of accommodation policies as soon as practicable after they begin their employment.



## Barriers, issues, and actions for this pillar

Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
Consultation with PWD	Encourage people in the current workforce with disabilities to participate in the development of the CCC Accessibility Plan.	Invite all current workforce members who have self-identified to HR as having a disability to a stakeholder interview regarding the development of this Plan.	2022	Director, HR	Completed	None
Participation of PWD	People in the current workforce with disabilities participate in the development of the CCC Accessibility Plan.	Conduct interviews with a third-party expert with volunteers at CCC who live with a disability.	2022	Director, HR	Completed	None

Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
Hiring practices	Hiring practices are free of barriers for persons with disabilities.	Analyze hiring tools and resources for interview boards to confirm that the hiring practices are barrier-free for people with disabilities.	January to March 2023	Director, HR	In progress	None

Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
Manager training toolkit	A Manager's training toolkit regarding disabilities issues exists.	Create a Manager's training tools: (sample topic examples: invisible disabilities, soft skills such as building trust and coaching, the diverse value that persons with disabilities can bring to teams, how to avoid confusing job support and performance issues, designing and implementing accessible programs and services).	January to June 2023	Director, HR	Not yet started	Outsource

HR policy and communications	Policy and communications regarding recruiting, retention, and promotions are equitable for potential and existing employees with disabilities.	Annual confirmation / analysis of policy and communications regarding recruiting, retention, return to work, exit interviews, and promotions; to confirm they are equitable for potential and existing employees with disabilities. This would include Identifying where systemic barriers exist in staffing processes at the corporate and hiring manager levels and possible solutions.	January and February of each year	Director, HR	In progress	Outsource
------------------------------	---	---	-----------------------------------	--------------	-------------	-----------

Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
Disability management training	HR and team leaders gain competencies in disability management.	Develop (and deliver the training for) a training plan (optionally based on existing models) for HR and managers regarding disability management (optionally as part of a broader equity, diversity, inclusion, or unconscious bias training program).	July to December 2023	Director, HR	Not yet started	None
Hybrid work	A hybrid work environment policy recognizes opportunities for accommodation for a disability.	Identify and evaluate accessibility barriers and opportunities in the hybrid work environment.	November 2022 to February 2023	Director, HR	In progress	Outsource

Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
Mentoring	CCC is poised to offer mentoring to workforce members requesting accommodation regarding disability.	Establishment of a mentoring program for employees with disabilities who would benefit from informal coaching from others with lived experience (from CCC or elsewhere), and in concert with the PromoteHer mentoring program.	December 2022 to July 2023	Director, HR	In progress	Pilot development in progress

Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
Public notification	Public and CCC workforce has been notified that CCC accommodates people with disabilities (during the recruitment and assessment process as well as once individuals are hired.)	Notify the public and CCC's workforce via the public-facing website of the publication of the Accessibility Plan.	2022	Director, Marketing	Completed	None

# Built environment

## Commitment

CCC is committed to accessibility in all physical spaces.

CCC will consult with people with disabilities when building or making major modifications to public spaces. In the event of a service disruption, CCC will notify the public of the service disruption and the alternatives available.

CCC will advise employees responsible for public spaces of the requirements of the Accessible Canada Act.

## Barriers, issues, and actions for this pillar

Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
Built environment accessibility audit	Physical workspace is barrier-free.	Complete accessibility audits for all CCC headquarters addressing base-building elements and tenant space within, including client service spaces.	January to March 2023	Senior Director, Corporate Affairs	Not yet started	Outsource
Built environment remediation	Conformance to the GCworkplace Design Guide.	Planning and executing any necessary	April to October 2023	Senior Director, Corporate Affairs	Not yet started	None



Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
		remediation at headquarters.				
Annual built environment reaudits	Conformance to the GCworkplace Design Guide.	Annual audit as well as proactive inclusion of universal design in any planned fit-ups, including ensuring that any new or modified workspaces conform to the accessibility requirements within the GCworkplace Design Guide.	April 2023 to December 2025	Senior Director, Corporate Affairs	Ongoing	None
In-person meetings accessibility	Accessible meetings and conferences.	Training for meeting coordinators on planning, managing, and	May to October 2023	Senior Director, Corporate Affairs	Not yet started	None

Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
		moderating accessible meetings both at HQ office space and off-site.				

# Information and communication technologies (“ICT”)

## Commitment

CCC is committed to making our information and communications accessible to people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

## Barriers, issues, and actions for this pillar

Barrier of issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
Lack of an IT/IM framework for accessibility	An eAccessibility strategy is in place that takes into account all existing and planned ICT.	Review, streamline and improve the effectiveness of the process for meeting the needs of employees with disabilities for adaptive IT tools and technologies, including assessment, approval of applications and software,	January to April 2023	Director, IT	Not yet started	Include in 3-year IT Strategic Plan

<b>Barrier of issue</b>	<b>Intended Outcomes</b>	<b>Planned action(s)</b>	<b>Timeline</b>	<b>Roles and responsibilities</b>	<b>Status</b>	<b>Notes</b>
		procurement and installation.				
Website and web content accessibility	EN 301 549 conformance.	Third-party WCAG 2.1 AA conformance audit, followed by any necessary remediation.	January to June 2023	Director Marketing	Not yet started	None
Intranet accessibility	EN 301 549 conformance.	Third-party WCAG 2.1 AA conformance audit, followed by any necessary remediation.	January to June 2023	Director, Marketing	Not yet started	None
CMS, instructional modules, and meetings accessibility	EN 301 549 conformance.	Third-party WCAG 2.1 AA conformance audit, followed by any necessary remediation.	January to August 2023	Director, Marketing	Not yet started	None

<b>Barrier of issue</b>	<b>Intended Outcomes</b>	<b>Planned action(s)</b>	<b>Timeline</b>	<b>Roles and responsibilities</b>	<b>Status</b>	<b>Notes</b>
Software tools accessibility	EN 301 549 conformance.	Third-party WCAG 2.1 AA conformance audit, followed by any necessary remediation.	April to June 2023	Director, IT	Not yet started	None
Document accessibility	EN 301 549 conformance.	Develop inclusive-by-default templates for all Office 365 documents used regularly.	April to August 2023	Director, IT	Not yet started	None
Digital accessibility skills training	EN 301 549 conformance.	Develop (and deliver the training for) a training plan for specialized document and event development tools.	January to June 2023	Director, IT	Not yet started	None

# Communication, other than ICT

## Commitment

CCC is committed to making our information and communications accessible to people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

## Feedback

CCC will ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities and will notify the public of the same via its website. Individuals will have the option of providing feedback in person, via e-mail, by phone, or in writing. In accordance with the *Accessible Canada Act*, CCC is publishing details about the feedback process. CCC has consulted with people with disabilities in establishing the feedback process and will conduct a periodic review of the feedback process to ensure it meets the needs of persons with disabilities.

**Barriers, issues, and actions for this pillar**

<b>Barrier or issue</b>	<b>Intended Outcomes</b>	<b>Planned action(s)</b>	<b>Timeline</b>	<b>Roles and responsibilities</b>	<b>Status</b>	<b>Notes</b>
Feedback mechanism	Feedback process in place.	Establish the feedback process and publish it on CCC's main website.	December 2022 to January 2023	Communications	In progress	None
Feedback response	Receive and respond to feedback.	Receive and respond to feedback, and provide information about the feedback process in an accessible format upon request.	January 2023 to December 2025	Director, HR	Ongoing	None
Establish plan ownership	Designate responsibility for the implementation of this Accessibility Plan.	Name an Executive for Accessibility to support the implementation of the Accessibility Plan.	December 2022 to January 2023	VP, Corporate Services and CFO	Completed	None



<b>Barrier or issue</b>	<b>Intended Outcomes</b>	<b>Planned action(s)</b>	<b>Timeline</b>	<b>Roles and responsibilities</b>	<b>Status</b>	<b>Notes</b>
Diversity and Inclusion Committee	Synergies, barriers, and accountability have been identified.	Add this outcome to the Terms of Reference to the existing Diversity and Inclusion Committee.	January 2023	Senior Director, Corporate Services	Not yet started	None
Performance agreements	Build clear, actionable accessibility commitments.	Performance agreements/ metrics are in place for executives, managers, and employees in leadership roles that reflect the priorities identified.	April 2023 to December 2025	Director, HR	Not yet started	None

<b>Barrier or issue</b>	<b>Intended Outcomes</b>	<b>Planned action(s)</b>	<b>Timeline</b>	<b>Roles and responsibilities</b>	<b>Status</b>	<b>Notes</b>
Lack of awareness and competencies regarding accessibility	Everyone at CCC has a common baseline understanding and sensitivity regarding accessibility issues.	Conduct accessibility awareness training for senior leaders, the entire workforce, and new hires.	July 2023 to December 2025	Director, HR	Ongoing	None
Publishing of Plan	Accessibility Plan published.	Upload the Accessibility Plan to a public-facing website.	December 2022	Director, HR	Complete	None
Annual update to this Accessibility Plan	Accessibility Plan updated annually.	Upload revised Accessibility Plan to a public-facing website.	Annually by December 31	Director, HR	Not yet started	None

Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
Limited awareness	Participate annually in National Accessibility Awareness Week, International Day for Persons with Disabilities, and National Disability Employment Awareness Month.	Develop a renewable communications plan for each event.	Annually, plan in place by August 31 each year	Director, HR	Not yet started	None

# Procurement of goods, services, and facilities

## Commitment

CCC is committed to the accessible procurement of goods, services, and facilities. We will consult with people with disabilities to determine their needs with respect to the procurement of goods, services, and facilities.

## Barriers, issues, and actions for this pillar

Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
Contracting or procurement excludes or disadvantages PWD	Contracting and procurement processes conform with accessibility standards as set by the Treasury Board Secretariat.	Conformance audit, followed by any necessary remediation.	January to December 2023	Vice-President, Contract Management	Not yet started	Outsource

## Design and delivery of programs and services

### Commitment

CCC is committed to accessible programs and services. CCC will ensure that all programs and services are designed and delivered in an accessible manner. CCC will consult with people with disabilities respecting their design and delivery needs.

### Barriers, issues, and actions for this pillar

Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
Consultation with clients with disabilities	PWD amongst CCC's clients has been consulted respecting aspects of the Plan that may impact them.	Plan, conduct, and assess potential follow-up actions from a survey amongst CCC's existing clients regarding the accessibility of programming and services that affect them.	December 2022 to February 2023	Director, HR	In progress	None
Accessibility of programs	The CCC manager of each service and program of CCC has provided	Each CCC manager arranges for the examination,	January to December 2023	4 Vice-Presidents	Not yet started	Outsource

Barrier or issue	Intended Outcomes	Planned action(s)	Timeline	Roles and responsibilities	Status	Notes
	<p>a report to senior management on how they examined their program through an accessibility lens and what significant changes are being implemented as a result.</p>	<p>including consultation with persons with disabilities, each service and program they lead through an accessibility lens, identifying what changes, if any, need to be made to ensure they are inclusive to their entire audience (potentially inspired by resources available from CSPS, TBS, or Shared Services Canada).</p>				

# Transportation

## Commitment

While CCC is committed to the idea of providing accessible transportation to persons with disabilities, this is outside of CCC's operational scope.

## Barriers, issues, and actions for this pillar

None.

# Consultations

## Workforce consultation

CCC contracted with an external accessibility expert team that includes people with lived experience with disability to perform one-on-one stakeholder interviews with most people currently working at CCC who have self-identified with a disability. All of those interviews took place during 2022, and the qualitative outputs from those consultations have been taken into consideration in the formulation of this plan.

## Client consultation

CCC has begun to plan a survey of clients living with disabilities that use CCC's programs and services, to be completed in early 2023.



## Training

As documented within the recommended actions above, CCC will train all employees and other staff members regarding the requirements of the *Accessible Canada Act* and its regulations and the *Canadian Human Rights Act* as it pertains to persons with disabilities. Training will be provided to staff upon hire, as soon as practicable and in a way that best suits their duties. Training will be provided on an ongoing basis, as needed, in relation to any changes to related policies. CCC will maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided.

# Glossary

*Source: Treasury Board of Canada*

This is a list of some terminology pertaining to disability and persons with a disability from various pertinent sources.

## **Accessible Canada Act (Section 2)**

“**disability** means any **impairment**, including a physical, mental, intellectual, cognitive, learning, communication, or sensory impairment — or a **functional limitation** — whether permanent, temporary, or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person’s full and equal participation in society.

**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 an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.”

## **Canadian Human Rights Act (Section 25)**

“**disability** means any previous or existing mental or physical disability and includes disfigurement and previous or existing dependence on alcohol or a drug.”

## **Employment Equity Act (Section 3)**

“**persons with disabilities** (PWD) means persons who have a long-term or recurring physical, mental, sensory, psychiatric, or learning impairment and who

(a) consider themselves to be disadvantaged in employment by reason of that impairment, or

(b) believe that an employer or potential employer is likely to consider them to be disadvantaged in employment by reason of that impairment,

and includes persons whose functional limitations owing to their impairment have been accommodated in their current job or workplace.”

The Employment Equity Team at Treasury Board Secretariat is now using the French term “**Personnes en situation de handicap**” which aligns with international usage and replaces the legislative term “Personnes handicapées” that appears in the Employment Equity Act and the Employment Equity regulations. The legal definition has not changed.

## **Canadian Charter of Rights and Freedoms**

“Equality rights are intended to ensure that everyone is treated with the same respect, dignity, and consideration (i.e. without discrimination), regardless of personal characteristics such as race, national or ethnic origin, colour, religion, sex, age, or mental or physical disability, sexual orientation, residency, marital status or citizenship.”

## **United Nations Convention on the Rights of Persons with Disabilities**

“(e) Recognizing that **disability** is an evolving concept and that disability results from the interaction between persons with impairments and attitudinal and environmental barriers that hinders their full and effective participation in society on an equal basis with others.”