



ACCESSIBILITY PLAN



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Plan sur l'accessibilité aux Relations Couronne-Autochtones et ffaires du Nord Canada (RCAANC)

Accessibility Plan at Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)

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Message from the Deputy Minister and Associate Deputy Minister

We are very proud to share **Crown-Indigenous Relations and Northern Affairs Canada's first Accessibility Plan** with you! We partnered with Indigenous Services Canada (SAC) to take action towards becoming a barrier-free Canada by 2040. Based on the [Accessible Canada Act](#), which came into effect in 2019, this three-year plan lists the priority areas for action and the steps we will take—in collaboration with persons with disabilities within our organizations—to identify, remove and prevent barriers to accessibility in the workplace and in our policies, programs and services, along with our expected outcomes.

Through this plan, we are recognizing the role our connections, collective efforts and contributions play in becoming more inclusive of persons with disabilities, both in our workplaces and in the programs and services we provide to First Nations, Inuit and Métis.

Persons with disabilities were involved in developing the accessibility plan from the very beginning through consultations with the ISC and CIRNAC Employee Network on Accessibility and Persons with Disabilities. We continue to work with them to improve our corporate policies and programs. We have made great achievements in collaboration with our employee networks and are proud to add the Accessibility Plan to that list.

Our vision for 2040 is that our department will be one of the best workplaces for employees with disabilities. They will feel truly welcome and have the support and space they need to take on roles that suit both their goals and their skills which will result in an improved workplace for all. We are committed to making CIRNAC a barrier-free and equitable department for our employees and clients with disabilities.

We will ensure that this plan remains evergreen and is adapted regularly. We hope that further actions will accompany those in this plan, allowing us to move forward.

Daniel Quan-Watson

Deputy Minister, Crown–Indigenous Relations and Northern Affairs Canada

Paula Isaak

Associate Deputy Minister, Crown–Indigenous Relations and Northern Affairs Canada

General

Creating a culture of equity, diversity and inclusion is a key priority across the Public Service. The *Accessible Canada Act (ACA)* and the *Accessible Canada Regulations (Regulations)* required all federally regulated entities to prepare and publish Accessibility Plans by December 31, 2022. Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) prepared its accessibility plan by exploring the barriers experienced by its employees and clients with disabilities, and then developed actions to address and eliminate these barriers in the future.

Accessibility involves all of us! CIRNAC is proud to be a contributor on this journey towards building a more inclusive and barrier-free Canada for all by 2040.

To provide feedback on barriers to accessibility or the accessibility plan, please contact the CIRNAC Senior Policy Advisor on accessibility through one of the following methods:

Email : SecretariatLCA-ACASecretariat@rcaanc-cirnac.gc.ca.

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Executive summary

The Government of Canada recognizes the importance of accessibility and is committed to becoming barrier-free by 2040. CIRNAC is proud to contribute to improving accessibility to ensure that all Canadians can fully participate and contribute to the workplace and be able to access all programs and services. To gain insights into barriers to accessibility, the organization consulted its employees with disabilities and interviewed national and regional Indigenous partners across Canada. The main areas for action listed under the *Accessible Canada Act* (ACA) include employment, built environment, information and communication technologies (ICT), communication (other than ICT), procurement of goods, services and facilities, design and delivery of programs and services, and transportation.

Employees with disabilities shared their feedback on the main areas for action listed under the ACA.

Under the employment area, persons with disabilities highlighted that there is, overall, a greater need for increased support and accommodation by managers in order for them to thrive in the workplace. A key measure to address this would be to increase training for managers, and raise their awareness of the formal accommodation request process.

Concerning built environment, the importance of the accessibility of the physical office spaces was discussed. To address these needs, actions will be taken to review and renovate the existing buildings to meet accessibility standards.

In the area of information and communication technologies, the need for accessible Information Technology (IT) tools in the workplace was highlighted. There is a need to review and assess existing technologies for their accessibility. Additionally, accessibility standards need to be considered when procuring new technologies.

In communications, employees expressed a great need for training and awareness around making communications accessible. Accessible communication standards need to be widely spread throughout the organization to ensure all communications can be accessed by everyone.

Concerning procurement, the need for accessible procurement processes and the training to complement these processes was expressed. It is important that accessible procurement standards be communicated and implemented throughout the organization.

Indigenous partners representing clients with disabilities shared their feedback on the design and delivery of programs and services area. They shared that an accessibility lens is needed when designing programs and services. Additionally, employees need a greater understanding of clients with disabilities and their accessibility needs to design and deliver these programs and services. It is important for these programs and services to be supported by a feedback mechanism so clients can make suggestions to improve the programs.

To address the various barriers noted above, CIRNAC has put forward concrete actions in its 2022 Accessibility Plan with a view to eliminate these barriers and create a more accessible workplace.

The next steps for this Plan include completing a cost analysis to develop a budget and address resource and funding needs. Additional consultations with various stakeholders will be conducted to address intersectionality and gain additional insights into the accessibility for persons with disabilities.

This Plan is only the beginning as we journey together with these changes. We look forward to continue to collaborate with our stakeholders to build a more inclusive, accessible, collaborative, and welcoming organization for everyone.

Areas described under article 5 of the ACA

The *Accessible Canada Act* (ACA) is a federal law that aims to identify, eliminate and prevent barriers experienced by persons with disabilities in the following seven areas for action:

- employment
- built environment (physical spaces)
- information and communication technologies (ICT)
- communication (other than ICT)
- procurement of goods, services and facilities (buying and renting things and places)
- design and delivery of programs and services
- transportation

Some of these areas overlap or are inter-dependent. The design and delivery of programs and services area focuses on barriers and actions related to improving accessibility for external clients with disabilities. For CIRNAC, the transportation area does not apply, so it is not developed in this plan.

Our accessibility plan is organized by areas for action, with sub-headers in each area to include:

- specific information about the area for action
- vision of the area for action
- what we heard in consultations
- barriers identified by employees, clients, consultation participants, or others; and,
- actions with concrete steps to remove and prevent those barriers, including timelines, roles and responsibilities, and intended outcomes with measurements.

The accessibility plan respects, and is integrated within, our organization's policies, programs, practices and services. Persons with disabilities have been consulted to identify and provide advice about barriers, which are reflected in the following areas for action. For details about the manner in which our organization consulted persons with disabilities in the preparation of our accessibility plan, please refer to the "Consultations" section.

Employment

This area for action includes aspects of the workplace, such as job interviews, training, and performance evaluations.

Specific information about this area of action:

The Human Resources and Workplace Services Branch's (HRWSB) goal is to provide efficient, effective and high-quality services. These services are provided at CIRNAC and Indigenous Services Canada (ISC). In CIRNAC, HRWSB is supported by the Diversity, Inclusion and Anti-Racism Secretariat, whose mandate is to promote diversity and inclusion and to act as a "champion of champions" in this area. As well, employee networks and departmental champions are actively involved in fulfilling this mandate.

Vision of accessible employment:

In 2040, CIRNAC is recognized as an employer of choice for persons with disabilities. The Department provides welcoming language and barrier-free processes, accessible job postings, equitable selection mechanisms, and inclusive career development, leading to increased retention. In addition, accommodation requests made by persons with disabilities are implemented quickly. Managers, procurement officers, business units and everyone else who has a role to play in addressing accessibility and accommodation needs are invested in this responsibility and make it their priority. Our hospitality and employee services are accessible by default.

What we heard in consultations:

Consultations related to the employment area of action generated a lots of feedback and suggestions from employees with disabilities. Highlights from the consultations include:

- 35.2% of persons living with disabilities have discussed their disability with a supervisor or manager, while 22.2% do not feel comfortable discussing it.
- 23.3% of total respondents feel they have experienced attitudinal barriers at work, and 20.5% of respondents have observed co-workers experiencing such barriers.
- There are difficulties in implementing the Workplace Accessibility Passport, a document that allows persons with disabilities to register their accommodation needs and not have to reapply when they change jobs or departments. In fact, 62.9% of respondents with disabilities were not aware of the Accessibility Passport, while 2.9% of respondents had already implemented a Passport.
- Regarding requests for accommodation, 60% of persons living with disabilities who have requested accommodation in the past two years have received their accommodation, 13.3%

have been refused, and 20% indicated that their request was pending. Finally, 6.7% received an accommodation but did not receive the specific accommodation requested.

- 14.5% of persons living with disabilities felt very satisfied with the ergonomic or adaptive equipment provided to them to do their work, while 38.2% felt satisfied, 10.9% not very satisfied, and 3.6% very dissatisfied (32,7% answered “Not Applicable”).
- Respondents to the various consultations identified a significant need for resources for staff with disabilities, as well as training for managers on how to accommodate individuals within their teams. Employees with disabilities also reported that they found the processes of requesting and obtaining workplace accommodations difficult, or that they were not aware of the existence of this service at all.
- Hiring targets for persons with disabilities are needed to achieve a more diverse workforce.
- More emphasis needs to be placed on consultations with other employment equity groups, such as Indigenous employee groups.
- It is hoped that more staff with different types of disabilities will be hired which would provide a greater diversity of people with different types of disabilities within CIRNAC. More emphasis needs to be placed on equal opportunity for employees with disabilities in job postings.

Barriers and actions

Barrier 1: Requests for accommodation are not processed in an efficient or timely manner.

Actions to address barrier 1:

- **Action 1:** Promote the use of the Accessibility Passport so that persons with disabilities can register their accommodation needs and not have to repeat their request when they change positions or departments.
 - **Timelines:** April 2023
 - **Roles and responsibilities:** The Centre for Abilities Management and Workplace Wellbeing (CAMWW) determines any relevant information to be developed and distributed regarding the Passport.
 - **Intended outcome:** Information is available on the Intranet and awareness tools are in place.
- **Action 2:** Provide training to managers on their role and responsibilities in responding to accommodation measures.
 - **Timelines:** December 2024
 - **Roles and responsibilities:** The CAMWW establishes a partnership with the Workplace Effectiveness Directorate to implement appropriate training.
 - **Intended outcome:** Training is available for managers, and it is possible to track the number of managers who have taken the training.
- **Action 3:** Create a VIP team to expedite the processing and procurement of all accommodation request items.
 - **Timelines:** April 2025

- **Roles and responsibilities:** The CAMWW plans and establishes the VIP team.
- **Intended outcome:** Persons who requested accommodation are satisfied with services received.

Barrier 2: Difficulty recruiting persons with disabilities

Actions to address barrier 2:

- **Action 1:** Promote existing pools of persons with disabilities
 - **Timelines:** April 2023
 - **Roles and responsibilities:** The Regional Client Service Delivery Branch develops and distributes communications on this topic
 - **Intended outcome:** Emails on this subject are frequently sent to managers.

- **Action 2:** Implement targeted hiring processes for persons with disabilities, based on data regarding the current representation of persons with disabilities within departments in relation to estimated workforce availability.
 - **Timelines:** December 2023
 - **Roles and responsibilities:** The Regional Client Service Delivery Branch raises awareness and encourages action on this issue at various senior management tables
 - **Intended outcome:** Target hiring processes are in place

- **Action 3:** Create a specialized team to support and inform managers who wish to hire persons with disabilities
 - **Timelines:** December 2025
 - **Roles and responsibilities:** The CAMWW plans and establishes the specialized team.
 - **Intended outcome:** The CAMWW has provided support for a number of requests with the help of the specialized team.

Barrier 3: Difficulties faced by persons with disabilities in the hiring process.

Actions to address barrier 3:

- **Action 1:** Conduct a study on employment systems, policies and practices to determine barriers with respect to employment opportunities, and develop and promote more inclusive hiring practices.
 - **Timelines:** March 2023
 - **Roles and responsibilities:** The study will be conducted by the Department's Organizational Effectiveness Directorate
 - **Intended outcome:** The study on employment systems, policies and practices is completed and more inclusive hiring practices are promoted to human resources advisors and hiring managers.

- **Action 2:** Provide training to managers and human resources advisors to determine barriers to accessibility in the hiring process
 - **Timelines:** December 2025

- **Roles and responsibilities:** The Regional Client Service Delivery Branch and the CAMWW develop training and engage the five service centres to organize training for all staffing advisors and managers
- **Intended outcome:** Human resources advisors and managers have received training.
- **Action 3:** Establish a goal to increase the number of employees with disabilities.
 - **Timelines:** March 2023
 - **Roles and responsibilities:** The Deputy Minister sets the goal, shares it with senior management and asks them to develop the means to achieve it.
 - **Intended outcome:** Senior management performance management assesses the achievement of the hiring goal.
- **Action 4:** The new self-declaration form and its importance are promoted so that targets can be set to hire persons with diverse disability situations.
 - **Timelines:** March 2025
 - **Roles and responsibilities:** Workplace Effectiveness Directorate develops materials to promote and raise awareness of the new form.
 - **Intended outcome:** Goals for achieving a diverse workforce are developed by targeting a diversity of disabilities.

Barrier 4: Difficulties faced by persons with disabilities with respect to integration and retention.

Actions to address barrier 4:

- **Action 1:** Develop communications and tools that enable managers to integrate work objectives into performance evaluations based on the accommodation needs of persons with disabilities.
 - **Timelines:** December 2024
 - **Roles and responsibilities:** The Regional Client Service Delivery Branch and the CAMWW proactively support managers in setting performance objectives that are aligned with the accommodation needs of persons with disabilities.
 - **Intended outcome:** A communication plan and tools are developed to support managers
- **Action 2:** Provide training to managers and human resources advisors to assist them in determining barriers to accessibility with respect to integration and retention.
 - **Timelines:** December 2025
 - **Roles and responsibilities:** The Regional Client Service Delivery Branch and the CAMWW develop training and engage the five service centres to organize training for all staffing advisors and managers
 - **Intended outcome:** Human resources advisors and managers have received training.

Built environment (physical spaces)

This area of action is concerned with spaces in the workplace used by employees, including workspaces and common areas.

Specific information about this area of action:

With respect to office buildings, CIRNAC is a tenant of Public Services and Procurement Canada (PSPC) and occupy space in both Crown and commercially leased buildings. The National Accommodations sector provides a shared service to CIRNAC and ISC. When changes are made to the buildings, CIRNAC works in partnership with PSPC and the companies that manage the buildings to ensure that the properties exceed minimum industry standards.

Vision regarding accessibility in the built environment:

In 2040, CIRNAC provides accessible workspaces for persons with disabilities. Our built environments are barrier-free. The organizational approach to our built environment is based on an "inclusive design" and "accessible by default" mindset.

What we heard in consultations:

Consultation on the built environment area for action generated some feedback and recommendations from employees with disabilities. Highlights from these consultations include:

- 21.7% of those living with a disability indicated that their current office building was fully accessible, 17.4% indicated that it was very accessible, 17.4% indicated that it was somewhat accessible, and 8.7% indicated that it was not accessible (34,8% answered "Not Applicable").
- Employees indicated that existing workplace design infrastructure was inconsistent. For example, there is a lack of automatic doors in buildings, ramps that are not always accessible due to obstructions, and it is difficult for employees with disabilities with mobility issues to move between or around workplaces. It was mentioned that working from home has mitigated many of these issues.

Barriers and actions

Barrier 1: There is a lack of universal and accessible washrooms.

Actions to address barrier 1:

- **Action:** Implement office space modernization projects to implement GCWorkplace fit-up standard to build accessible universal washrooms.
 - **Timelines:**
 - By 2022, modernization project in the NCR – 9 Montclair and Quebec – 320 St-Joseph
 - By 2023, modernization project in the NCR – Jeanne Mance building and B.-C. (Vancouver) – 1138 Melville
 - By 2025, modernization project in Alberta (Edmonton) – Canada Place
 - By 2026, modernization project in the NCR – Terrasses de la Chaudière
 - By 2027, modernization project in Manitoba (Winnipeg) – 391 York
 - **Roles and responsibilities:** The National Accommodations Directorate, in partnership with PSPC or building management companies, ensures that universal washroom are included in all retrofit project.
 - **Intended outcome:** Universal washroom are included in all retrofit projects.

Barrier 2: There are challenges to accessing certain collaboration office spaces due to the lack of automatic door openers.

Actions to address barrier 2:

- **Action:** Conduct office space modernization projects to implement the [GCWorkplace fit-up standards](#). All new builds or retrofits will be accessible by design and automatic door openers will be installed by default.
 - **Timelines:**
 - In 2022, modernization project in the National Capital Region (NCR) at 9 Montclair and in Quebec at 320 St-Joseph
 - By 2023, modernization project in the NCR at the Jeanne Mance building and in Vancouver, British-Columbia (BC) at 1138 Melville
 - By 2025, modernization project in Edmonton, Alberta at the Canada Place
 - By 2026, modernization project in the NCR at Terrasses de la Chaudière
 - By 2027, modernization project in Winnipeg, Manitoba at 391 York
 - **Roles and responsibilities:** The National Accommodation Directorate, in partnership with PSPC or building management companies, to ensure that retrofit project includes automatic door openers for collaborative spaces.
 - **Intended outcome:** Automatic door openers are installed in all retrofit projects.

Barrier 3: Persons with disabilities are facing challenges related to common space areas. Some challenges include difficulties accessing buildings, lack of braille signage, non-accessible height of kitchen sinks and counters, not-adaptable lighting, and narrow and cluttered passageways and corridors.

Actions to address barrier 3:

- **Action:** Review and identify areas in office spaces in need of improvement for accessibility.
 - **Timelines:** By December 2023
 - **Roles and responsibilities:** The National Accommodations Directorate, in partnership with PSPC or building management companies, complete the review of office spaces..
 - **Intended outcome:** Review is completed and barriers are identified. An action plan to address barriers is developed.

Information and communication technologies (ICT)

This area of action includes technologies that organizations use to communicate with both their employees and the public, broadcasting, and telecommunications. At CIRNAC, these technologies include items such as websites, email, text messages, and computer programs. Telecommunications include telephone and Internet services.

Specific information about this area of action:

The Information and Communication Technology (ICT) Branch provides Information Management and Information Technology (IM-IT) products and services on a shared service basis to CIRNAC and ISC. It focuses on helping stakeholders and customers achieve their business objectives through the reliable,

secure and cost-effective use of IM-IT tools. It is comprised of eight business sectors, as well as the Office of the Chief Information Officer.

The eight business sectors are: (1) Enterprise IM-IT Strategic Services, (2) Benefits Modernization and Transformation, (3) Corporate Information Management, (4) Enterprise Data and Analytics Services, (5) Enterprise IT Infrastructure Services, (6) Enterprise IT Service Delivery, (7) Enterprise IT Support and Operations, and (8) Operations and Planning.

Vision regarding information and communication technology accessibility:

In 2040, all employees have the electronic and software tools they need to do their jobs. Accessibility is an integrated and expected component of IT processes and within the IT infrastructure (e.g., security, infrastructure, and application development). Accessibility is part of the standardized approaches. Employee needs are considered in the life cycle of software development, services, software and hardware purchases.

What we heard in consultations:

The ICT area for action generated some suggestions from employees who were consulted. Here are some highlights from the consultations:

- 28.8% of persons living with disabilities felt well supported by computer specialists when they needed help using their accessible software and technology, 9.6% of respondents said they did not feel supported but still managed, and 3.8% responded that they did not feel supported and did not know who to ask (57,7% answered “Not Applicable”).
- 87.3% of respondents felt that virtual meetings were fully accessible, 12.7% felt that these meetings were partially accessible, and none felt that these meetings were not accessible.
- Employees identified a need for adaptive computer technology at meetings, e.g., intelligent closed captioning software for bilingual meetings in virtual mode.
- Employees indicated a need to increase awareness among new employees of the types of non-standard equipment that may be available as needs develop.
- There are difficulties and delays in selecting and receiving the appropriate technology needed to do their jobs.
- In addition, there is a lack of compatibility between Government of Canada Intranet documents and accessibility software (these problems occur primarily when using screen reading software).

Barriers and actions

Barrier 1: The information and communications technologies (ICT) within the organization do not consistently meet accessibility requirements.

Actions to address barrier 1:

- **Action 1:** Identify an Information Management-Information Technology (IM-IT) Accessibility Champion for the area of Information Technology (IT) Services.
 - **Timeline:** By April 2023
 - **Roles and Responsibilities:**
 - Establish working group that includes members from IT services, the Accessibility and Persons with Disabilities Employee Network, Human Resources and Corporate Communications
 - Create a Management Action Plan to address ICT accessibility challenges and barriers
 - **Intended outcome:** Actionable and relevant Key Performance Indicators are identified to measure current status of ICT accessibility levels and assess progress over time.

- **Action 2:** Leverage resources and services offered by Treasury Board of Canada Secretariat (TBS) and Shared Services Canada (SSC) for guidance and identification of accessible ICT and adaptive technologies required for employees with disabilities to do their jobs.
 - **Timeline:** Ongoing, for the duration of the 2022-2025 Plan
 - **Roles and Responsibilities:** IM-IT Accessibility Champion to work with HR accommodations, Software Licensing and IT Service Desk to improve and streamline business processes for employees and managers to request appropriate adaptive technologies.
 - **Intended outcome:** Employees reporting higher levels of satisfaction with the ergonomic and/or adaptive equipment provided to do their work, in the annual accessibility survey.

- **Action 3:** Ensure the compliance of all new ICTs to Treasury Board Secretariat's (TBS) accessibility standard (i.e., [EN 301 549](#))
 - **Timeline:** By April 2024
 - **Roles and Responsibilities:**
 - Accessibility Business Owner within the area of IT Services to assess and validate compliance of all new ICT
 - IT Infrastructure and Operations team to engage with third party service providers (i.e., Microsoft for MS Teams and Office applications) to identify and address accessibility
 - Forms Services to ensure that all existing official departmental forms are accessible (update where required) and ensure that new forms meet accessibility requirements
 - **Intended outcome:** The department meets the accessibility compliance under the TBS ICT Accessibility Scorecard.

- **Action 4:** Complete accessibility conformance testing of all existing ICT within CIRNAC.
 - **Timeline:** By April 2025
 - **Roles and Responsibilities:**
 - Enterprise Architecture to create complete list of all existing ICT.
 - Accessibility business owner within IT Services to complete conformance testing of all existing ICT.
 - **Intended outcome:** The department meets the accessibility compliance under the TBS ICT Accessibility Scorecard.

- **Action 5:** Work with service areas to ensure accessibility requirements are considered and included as part of their Business Continuity Planning (BCP)
 - **Timeline:** By April 2024
 - **Roles and Responsibilities:** BCP team will work with service areas from sectors and programs to add accessibility considerations to their current Business Impact Assessments (BIA)s.
 - **Intended outcome:** Accessibility risks associated with service delivery in the event of business disruptions are measured and tracked to ensure minimum service levels are met to deliver critical services.

Barrier 2: Instilling accessibility culture within IT Service and with our employees will involve change, that may be met with some resistance. Employees want fully interactive and visually complex solutions that may not be accessible. IM-IT professionals may lack the knowledge and awareness of adaptive technologies required for employees with disabilities.

Actions to address barrier 2:

- **Action 1:** Form a coalition of “Change Champions” to implement change management and promote accessibility within IT Services.
 - **Timelines:** By April 2024
 - **Roles and responsibilities:**
 - IM-IT Accessibility Champions will work to identify cultural barriers and increase awareness.
 - Management will promote accessibility training materials for IM-IT professionals.
 - IM team will promote “How to make information accessible” to all employees
 - **Intended outcome:** Employees reporting higher levels of satisfaction with the level of support they receive from IM-IT services in the annual accessibility survey

- **Action 2:** Implement and promote accessible ICT services within IT Services to provide better support for employees with disabilities.
 - **Timelines:** By April 2025
 - **Roles and responsibilities:**
 - Internal stakeholder collaboration to implement and promote efficient processes throughout IT Services that support employees with disabilities
 - Enterprise Architecture (EA) within IT Services to establish a portfolio of adaptive technologies that can be provided to employees with disabilities without delay, and to update Non-standard Software Request Forms to include Accessibility requirements
 - **Intended outcomes:**
 - Employees reporting higher levels of satisfaction with the ergonomic and/or adaptive equipment provided to do their work, in the annual accessibility survey.
 - Employees reporting higher levels of satisfaction with the level of support they receive from IM-IT services in the annual accessibility survey

- **Action 3:** Anchor accessibility within CIRNAC and ISC’s culture by mandating accessibility training for IM-IT professionals and incorporation into Performance Management Agreement objectives.
 - **Timelines:** By October 2025
 - **Roles and responsibilities:**

- IM-IT Accessibility Champion will continue to work with partners and working groups to identify barriers and promote awareness and communications
- IM-IT management will identify appropriate accessibility training for employees and include objectives in performance Management Agreements where applicable
- **Intended outcomes:**
 - Employees reporting higher levels of satisfaction with the ergonomic and/or adaptive equipment provided to do their work, in the annual accessibility survey.
 - Employees reporting higher levels of satisfaction with the level of support they receive from IM-IT services in the annual accessibility survey

Barrier 3: There is currently no funding allocated for accessibility development and testing within IT Services. Funding is required to increase IT Services' expertise and ability to assess ICT accessibility.

Actions to address barrier 3:

- **Action 1:** Incorporate accessibility requirements, and additional funding requirements within the Departmental Plan for Service and Digital for fiscal year 2023-24 and beyond. Submit departmental funding requirements through the annual investment Planning exercise for sustainable funding.
 - **Timelines:** By April 2024
 - **Roles and responsibilities:**
 - IM-IT planning team within IM-IT Enterprise Strategic Services to update the Departmental Plan for Service and Digital.
 - IM-IT Accessibility business lead to explore options in leveraging existing services provided by partners and prioritize technologies that have been identified to meet accessibility requirements by TBS.
 - **Intended outcome:** A supplementary budget is incorporated into future IM-IT financial planning.

Communications (other than ICT)

This area of action includes the ways that persons give, receive and understand information. Persons communicate in a variety of ways, including speech, writing, sign languages, pictures, body language and communication assistants. It is important that everyone is able to understand information shared and has access to information in formats that work for them. This can be achieved by making sure to provide alternative text for images, a clean layout to help the digestibility of content, and large fonts. The use of sign languages, communication assistants and sign language interpreters also help to make communications accessible for everyone. The Canadian Accessibility Act recognizes American Sign Language (ASL), Langue des signes québécoise (LSQ) and Indigenous Sign Languages as the primary languages of deaf people in Canada.

Specific information about this area of action:

The Communications and Public Affairs sector is a shared service for CIRNAC and ISC. This sector is responsible for developing internal and external communications products. This includes content for public awareness campaigns, social media, web, Intranet, departmental news releases and statements, and speeches. The sector also creates images and videos, and plans events.

Communications' Accessibility Vision:

In 2040, the sector identifies and applies new and existing accessibility standards to create barrier-free communications and develop products that are accessible to all. To achieve this, Communications identifies training opportunities for employees, provides guidance and advice to employees, and develops and shares accessibility-related guidelines and tools. This will result in communication products that are accessible to all and will ensure that everyone is included.

What we heard in consultations:

The communication area of action generated feedback and suggestions from employees who were consulted. Here are some highlights from the consultations:

- 71% of survey respondents who identified themselves as living with a disability are always able to communicate/receive communications in their preferred method(s), 25.8% are sometimes able to do so, 1.6% are never able to do so, and 1.6% do not know.
- 65% of survey respondents felt they would benefit from training to make documents more accessible, 20.4% said they would not, and 14.6% were unsure.
- 50% of survey respondents felt that workplace communications are written in plain language, 9.8% felt that communications are not written in plain language, 37.3% felt that communications are sometimes written in plain language, and 2.9% did not know.
- Respondents identified a need for plain language in external and internal documents.

Barriers and actions

Barrier 1: Internal and external email communications are not fully accessible and not in plain language.

Actions to address barrier 1:

- **Action 1:** Explore training resources for employees on accessibility (e.g., accessibility tools and accessible formats) and plain language. Share available training resources, and begin with pilot training sessions.
 - **Timelines:** December 2023
 - **Roles and responsibilities:** Communications to collect existing resources with input from Human Resources, the Communications Community Office and the Canada School of Public Service.
 - **Intended outcomes:** Training and available resources are promoted on an ongoing basis. Resource utilization is measured.
- **Action 2:** Provide employees with guidelines on [plain language](#), [inclusive writing](#) and how to make correspondence [accessible](#) to everyone, and create easily shareable tools, such as information sheets.
 - **Timelines:** December 2023
 - **Roles and responsibilities:** Communications to develop or adapt relevant guidelines and associated products for employee use.
 - **Intended outcomes:** Guidelines are communicated in the internal newsletter and to managers. Resource uptake is measured.

Barrier 2: Documents, presentations, videos and events can be visually complex and not accessible to all.

Actions to address barrier 2:

- **Action 1:** Provide resources and advice to employees on accessibility guidelines and how to provide more accessible communications. Provide employees with relevant resources to support accessibility needs before publishing and promoting content.
 - **Timelines:** December 2023
 - **Roles and responsibilities:** Communications employees follow existing guidelines and templates and provide advice and support to employees as needed.
 - **Intended outcomes:** Training and resources are communicated in the internal newsletter and to managers. Resource uptake is measured.

- **Action 2:** Make events accessible by continuing to ensure sign language interpretation is offered, and that accessible formats and tools are used.
 - **Timelines:** December 2023
 - **Roles and responsibilities:** Communications team will support employees.
 - **Intended outcomes:** Interpretation, guidance and resources are provided to employees to support accessibility efforts for internal and external events and presentations.

- **Action 3:** Continue current practices including the use of alternative text for visual elements, provide content in both official languages and Indigenous languages where applicable, as well as in the form of a written transcript.
 - **Timelines:** Ongoing throughout the 2022-2025 Plan
 - **Roles and responsibilities:** Communications team will support employees.
 - **Intended outcomes:** Alternative text for visual elements is used, content is available in both official languages, and written transcripts are shared.

Barrier 3: Existing internal and external web content contains information that is inaccessible.

Actions to address barrier 3

- **Action 1:** Share accessibility guidelines and requirements, provide resources to employees and include accessibility requirements in contracts for externally developed and managed websites.
 - **Timelines:** December 2023
 - **Roles and responsibilities:** Communications, procurement and contracting teams
 - **Intended outcomes:** Accessibility guidelines and requirements are communicated to employees and contracting teams. Contracts are amended accordingly.

- **Action 2:** Continue current practice of applying accessibility standards to Intranet and public-facing Web content managed by CIRNAC and not publishing content that does not meet these standards. An alternative format that is accessible is suggested. CIRNAC to establish a working group to identify accessible formats and web applications.
 - **Timelines:** December 2024

- **Roles and responsibilities:** Communications and IM-IT: Establish a working group to identify accessible formats and web applications.
- **Intended outcome:** Content that is not accessible is not published and specific standards are in effect. A working group is created and completes the review of the non-accessible Web content.

Procurement of goods, services and facilities

This area of action includes the purchase and rental of goods, services and spaces.

Specific information about this area of action:

Procurement services enable the delivery of high quality services to First Nations, Inuit and Metis clients by purchasing goods and services on behalf of sectors, branches and regions to ensure the best value for Canadians. The procurement processes are guided by the Government of Canada procurement guidelines. This is described in the following documents [Policy Notification PN-142](#), [Directive on the Management of Procurement \(article 4.2.7.1\)](#). Employees can also consult the Accessible Procurement: Inclusive by Design, Accessible by Default.

Procurement vision for accessibility:

In 2040, procurement processes meet all legal obligations and standards on accessibility, including those under the *Accessible Canada Act* (ACA) and Accessibility Standards Canada. Procurement processes are centralized and prioritize assets related to accommodation requests from employees with disabilities.

Business owners, technical authorities and employees consider accessibility when specifying requirements for goods, services and facilities, and deliverables include features that make them accessible. Contracting officers challenge business owners, technical leads and employees about accessibility criteria. Preference is given to suppliers of services and goods that are inclusive of persons with disabilities.

What we heard in consultations:

In the employee questionnaire, there were no questions regarding the procurement area for action. However, comments regarding the need for improvement in the procurement process with respect to accommodation were raised by employees and are described under the employment area of action. Procurement subject matter experts identified accessibility-related improvements needed in their processes.

Barriers and actions

Barrier 1: The ACA is not always considered by business owners, technical authorities (TA), and employees when specifying requirements.

Actions to address barrier 1:

- **Action 1:** Publish articles in the internal newsletter about inclusion of accessibility considerations when purchasing and renting goods, services, or facilities.
 - **Timelines:** December 2023

- **Roles and responsibilities:** Procurement Services is responsible to write and submit the internal article. Communications are responsible for the publication.
- **Intended outcome:** One (1) publication per year.
- **Action 2:** Require business owners, TA, and employees to include accessibility considerations in a pre-procurement checklist.
 - **Timelines:** December 2023
 - **Roles and responsibilities:** Procurement Services to review the Pre-procurement checklist. Internal Forms to produce and distribute the form.
 - **Intended outcome:** All goods, services and facilities have a statement on file confirming inclusion of accessibility considerations or a valid justification that the accessibility considerations do not apply (i.e., accessibility non-applicability justification).

Barrier 2: Contracting officers lack commodity and market knowledge necessary to challenge the non-applicability of the ACA.

Actions to address barrier 2:

- **Action 1:** When the [Accessible Procurement Resource Centre \(APRC\)](#) is launched by Public Service Procurement Canada (PSPC), contracting officers are to use its list of commodities to challenge the accessibility non-applicability justifications of business owners, TA, and employees. Training to be provided to employees accordingly.
 - **Timelines:** December 2025
 - **Roles and responsibilities:** Contracting officers are responsible, using commodity and market knowledge gained via the APRC, for challenging any non-applicability justification. Support is provided by Public Services and Procurement Canada.
 - **Intended outcome:** Contracting officers are performing their accessibility challenge function using the commodity and market status analysis within PSPC's [APRC](#).

Design and delivery of programs and services

This area includes the way the organization designs and delivers programs and services to its clients.

Specific information about this area of action:

For the first Plan, CIRNAC will review the level of accessibility of its programs and services for its clients with disabilities so that these can be inclusive by design and accessible by default. CIRNAC will also develop standards for accessibility that include best practices, tools, and training. This will help to improve the service experience of clients with disabilities.

Design and delivery of programs and services vision for accessibility:

In 2040, our design and delivery of programs and services are inclusive and accessible-by-design to meet the needs of our clients and employees. Employees have the necessary tools and resources to design and deliver accessible programs and services to persons with disabilities. Our clients with disabilities are

engaged on the design and delivery of programs and services, and participate in feedback processes that are inclusive, accessible, and open while protecting their privacy and confidentiality.

What we heard in consultations:

For comments of what we heard regarding this area for action please refer to **Annex B – Summary of findings from external client engagement.**

Barriers and actions

Barrier 1: Currently the design of new external programs and services does not adequately address accessibility. This presents a barrier to external clients with disabilities in fully accessing CIRNAC programs and services.

Actions to address barrier 1:

- Create an accessibility advisory committee comprised of individuals with practical accessibility experience. This committee can bring their expertise to the table when designing CIRNAC programs and services. This includes involving persons with lived experience of disabilities.
- Building in accessibility from the start is key to ensuring that programs, services, tools, and applications can be used by everyone.
- Ways the department will incorporate inclusive by design and accessible by default practices are as follows:
 - Design the service to be as easy to use as possible. Not just in its initial design but in how it will be run on a day-to-day basis with constantly changing personnel. Usability is critical to making programs and services accessible for persons with disabilities.
 - Use ongoing research, testing and reviews to assess and improve the accessibility of programs and services. Engage continuously with persons with disabilities. This will ensure programs and services are accessible to persons of all abilities no matter how they access the program or service.
 - Confirm design and development resources have the expertise to build accessible programs and the ability to resolve accessibility issues.
 - Ensure testing and quality assurance resources have the expertise to identify accessibility issues.
- **Timelines:** March 2025
- **Responsibilities:** Program Authorities
- **Intended outcomes:**
 - All new programs and services are designed with accessibility in mind.
 - New programs and services are piloted with persons with disabilities to ensure accessibility by design.
 - Programs and services meet accessibility requirements as per the ACA.

Barrier 2: Some programs and services, and aspects of programs and services, still present accessibility barriers to persons with disabilities.

Actions to address barrier 2:

- Conduct a review of existing programs and services. The review will further investigate accessibility needs at the specific program and service level. An output of this review will be to compile a list of improvements that need to be made.
- This process will use an advisory committee made up of internal and external persons with disabilities. This committee will assist in testing the user experience.
- In addition to conducting this review, the department will also implement a feedback mechanism for clients. The feedback mechanism will enable clients to report accessibility concerns. Clients will also be able to request accessibility supports related to programs and services through this mechanism. CIRNAC will ensure processes are in place so that accessibility related feedback and requests submitted can be addressed in a timely manner.
 - **Timelines:** March 2025
 - **Responsibility:** Program Authorities
 - **Intended outcomes:**
 - Programs and services and their policies are reviewed for accessibility barriers.
 - A list of improvements needed is available.
 - Existing programs and services are adjusted to remove accessibility barriers.
 - An external client engagement survey that includes the experience of external clients with disabilities when accessing programs and services is completed. This can either be through a separate survey or be a section that is added to current surveys.
 - Feedback processes are established, as well as transparent mechanisms to address concerns raised by clients with disabilities within a reasonable time frame.

Barrier 3: There is a greater need for employees that deliver programs and services to understand what accessibility standards must be followed when interacting with external clients. When delivering programs and services, the application of consistent accessibility best practices is not always provided. Sometimes, this will lead to inconsistent levels of accessibility when delivering programs and services to clients.

Actions to address barrier 3:

- Develop accessibility standards that explain the best practices that need to be followed when interacting with external clients. CIRNAC will model accessibility standards from other organizations to develop their own set of standards.
- Use a collaborative approach with external clients to develop training. This training will be provided to all employees that are involved in the design and delivery of programs and services. Both cultural awareness and accessibility training will be provided to employees. This will ensure that employees are familiar with the expectations. Additionally, they will know how to apply notions of accessibility and cultural competence in their work.
 - **Timelines:** Mars 2025
 - **Responsibility:** HRWSB and Program Authorities

- **Intended outcomes:** Accessibility standards and training are provided to all employees on how to respond to accessibility needs of clients/partners.

Barrier 4 : There are several barriers that clients with disabilities experience when completing program and service application forms. Some examples of barriers that were identified include forms that are not in plain language, complex application processes, and the location of regional offices in some areas make the in-person access option not possible for many. There is also a need for increased awareness of the accessibility features and supports that CIRNAC offers clients.

Actions to address barrier 4:

- Increase the awareness of the various methods that can be used during the application process by promoting current accessibility features available to external clients. Clients need the ability for applicants to have help with the completion of forms or have someone else complete the form on their behalf.
- Collaborate with other government departments to learn accessibility best practices with the goal of making improvements to forms, processes and support available. This will also allow for the development of communications that can be provided to clients to better inform them of what CIRNAC is doing to remove accessibility barriers when accessing programs and services.
 - **Timelines:** March 2025
 - **Responsibility:** Communications, IM-IT and Program Authorities
 - **Intended outcomes:**
 - Improved accessibility of application forms and clients have a clear understanding of the various access options and accessibility supports available to them.
 - External client engagement survey questions created that focuses on the experience of external clients with disabilities accessing CIRNAC programs and services. This can either be through a separate survey or be a section that is added to current surveys.
 - Feedback processes established for external clients with disabilities, as well as transparent mechanisms to address concerns raised by clients with disabilities in a reasonable time frame.

Transportation

Transportation includes travelling between provinces or outside of Canada by plane, train, bus or ferry. It also includes vehicles used by organizations that are regulated by the federal government. There are no barriers identified under this area for action.

Consultations

To prepare the accessibility plan, the department consulted its employees with disabilities and met with national and regional Indigenous organizations representing its clients with disabilities. These consultations provided valuable insights on areas for improvement, which led to identifying concrete

actions the department could focus on in its first accessibility plan. The following provides a summary of the consultation processes.

Internal engagement

For internal engagements, the department started by creating an employee network on accessibility and disability in 2021. The Joint ISC/CIRNAC Accessibility and Persons with Disabilities Network has a membership of about 140 employees who have self-identified as persons with disabilities. This network generally meets on a monthly basis by videoconference. The network provides a meaningful forum for discussion around accessibility and disabilities in the workplace, including barriers to accessibility and actions to address barriers.

The employee network held virtual working group sessions in 2021 to brainstorm on areas of Nothing Without Us: A Public Service Strategy on Accessibility. Then prepared an employee-led action plan that later informed the department on actions needed within the accessibility plan.

The department created an ACA Implementation Secretariat in 2022 to coordinate the development of the accessibility plan, which included consultations with employees with disabilities and collaborations with the sector leads. An approach to develop the accessibility plan was presented and discussed with the employee network members, and employees were encouraged to provide feedback through a generic email address during the process.

The consultation approach included an employee questionnaire on accessibility for persons with disabilities in August 2022 to identify barriers to accessibility in the workplace. Extensive feedback was provided by employees with disabilities, managers, and other employees and partners without disabilities. A total of 128 people completed the questionnaire. Here is how the respondents identified themselves and the corresponding percentages:

- Person living with a disability: 26 %
- Ally of or employee of a person living with a disability: 30 %
- Supervisor or manager of a person living with a disability: 25 %
- None of the above: 19 %

The main results from this questionnaire are described within each of the areas of action.

Based on the feedback collected in the questionnaire, sector leads identified the top three to five barriers within each of the areas for action and identified concrete actions to address the barriers.

The Secretariat then held internal consultation sessions with the employee network in October and November 2022. Sessions were organized using a videoconferencing format with options for sign language. Each session focused on specific areas for action and ranged in duration from 45 minutes to an hour with an additional session being organized if needed.

During the sessions, sector leads presented the proposed actions and employees with disabilities provided their feedback. Employees were asked three questions: 1) Are these barriers the most important priorities for the next three years? 2) Will the proposed actions eliminate and prevent

barriers? and 3) What do each of the priority areas look like in 2040 when all barriers are eliminated? Employees with disabilities provided extensive feedback and a summary report is available in **Annex A**.

External engagement

For external engagement, the department completed preliminary engagement with regional and national Indigenous partners representing CIRNAC and ISC's external clients with disabilities. The input gathered from these sessions was used to identify the barriers and develop recommendations contained under the Design and delivery of programs and services area of action of the Plan. A summary of external client engagement findings is available in **Annex B**.

The engagement process was designed to facilitate honest feedback and identify barriers to accessibility within the organization. In preparation for the interview sessions, participants received a background document with contextual information along with a document listing the programs and services offered by CIRNAC and ISC.

An interview guide, interview invitations and online survey to allow for additional options for external clients to participate were developed. External partners were contacted to coordinate and schedule virtual interviews and circulate a link to an online survey for those that indicated they preferred providing input through that mechanism. Follow-up emails were sent in cases where initial engagement invitations went unanswered. Interviews were conducted and a report was prepared that included a summary of findings and the barriers and recommendations suggested by the partners that were engaged.

External clients representing the following organizations were engaged with either through one-on-one interviews, or group meetings:

- Assembly of the First Nations (AFN)
- BC Aboriginal Network on Disability (BCANDS)
- Indigenous Disability Canada (IDC)
- Inuit Tapiriit Kanatami (ITK)
- Métis National Council (MNC)

External clients representing the following organizations were engaged through the circulation of an online survey:

- Nunavummi Disabilities Makinnasuaqtiit Society (NDMS)
- Native Women's Association of Canada

Canadian Roots Exchange The department acknowledged that the internal and external engagement was only the beginning as the conversation and collaborations will continue throughout the accessibility journey. Also, the implementation of the Plan will include broadening engagement and collaborations with other groups and networks to gain a better understanding of the intersectionality lens and how it impacts employees with disabilities.

Diversity and inclusion initiatives

In October 2020, CIRNAC established a Diversity, Inclusion and Anti-Racism Secretariat (DIARS). DIARS supports the department's diversity, inclusion and anti-racism goals. It ensures that initiatives maintain momentum and focus. DIARS actively liaises with other government departments and all internal partners. This includes employee groups, to provide senior management recommendations and support departmental initiatives.

DIARS is working towards the development of a framework to set out the organization's vision for equity, diversity, inclusion and anti-racism. CIRNAC works through a collaborative and interconnected model to advance diversity and inclusion goals. It supports networks and employee-led learning events and offers discussions that include accessibility.

CIRNAC's Diversity and Inclusion Working Group, which includes members from all diverse networks, provides an intersectional forum that promotes collaboration and information sharing. This Working Group's governance is set out in a charter and terms of reference that inform the development of annual action plans to promote diversity and inclusion. This Working Group also applies the Gender-Based Analysis Plus (GBA Plus) intersectional lens. This ensures that CIRNAC considers the impacts of departmental initiatives on diverse groups of First Nations, Inuit, and Métis, men, women, 2SLGBTQIA+ people, youth, Elders, and persons with disabilities. A designated DIARS employee leads the work on the inclusion of employees with disabilities.

In December 2021, CIRNAC launched its Diversity and Inclusion Monthly Newsletter to inform employees of all the work related to diversity, inclusion, equity and anti-racism in our departments and across the Government of Canada. In this newsletter, employees find useful information, highlights of commemorative events and dates, tools and resources, interesting events and learning opportunities.

The implementation of the Plan will include working with DIARS and other groups and networks. This will help CIRNAC to gain a better understanding of the intersectionality lens and how it impacts employees with disabilities.

Budget and resource allocation

A cost analysis is to be completed to identify budget, resource and funding needs to carry out the accessibility plan.

Training

Training needs are included under each of the areas for action.

Glossary

The following definitions serve as a guide to better understand certain terms, but the list is not exhaustive. For additional definitions, please visit the [Guide on Equity, Diversity and Inclusion Terminology](#) or the [Accessibility Glossary](#).

- **Ableism:** Prejudice and discrimination against persons with a disability.
- **Accessibility:** Accessibility means that all persons are able to access and use a product, a service, or an environment with ease. When something is inaccessible, it means that barriers exist.
- **Accommodation:** In the context of work, a measure taken by management based on the personal circumstances of an employee that is designed to enable them to carry out their duties and fully participate in work-related activities. Some examples include new or modified equipment, software, devices, work schedules, tasks, or accessing captions.
- **Barrier:** Refers to anything physical, technological, socioeconomic, cultural or attitudinal, anything that is based on information or communications, or anything that is the result of a policy or a practice that hinders a person's full and equal participation in society.
- **Disabilities:** Refers to any impairment, including a physical, mental, intellectual, cognitive, learning, communication, sensory impairment, or a functional limitation. A disability may be permanent, temporary or episodic in nature, and can be evident or not, and a person may have one or more disabilities.
- **Discrimination:** The unjust or prejudicial treatment of a person or group of people that deprives them of or limits their access to opportunities and advantages that are available to other members of society.
- **Diversity:** The variety of identifies found within an organization, group or society. Diversity is expressed through factors such as culture, ethnicity, religion, sex, gender, sexual orientation, age, language, education, physical abilities and disabilities, family status or socioeconomic status.
- **Duty to accommodate:** Refers to the employers and service providers legal obligation to adjust policies or practices, including the design and adaptation of the work environment, to meet the needs of an individual to enable them to fully participate. According to the Supreme Court of Canada, duty to accommodate refers to what is required in the circumstances of each case to avoid discrimination. Visit [Duty to Accommodate](#) for more information.
- **Equity:** The principle of considering a person's unique experiences and differing situations, and ensuring they have access to the resources and opportunities that are necessary for them to attain just outcomes. Equity aims to eliminate disparities and disproportions that are rooted in historical and contemporary injustices and oppression.
- **Inclusion:** The act of recognizing, valuing and building on differences in identity, abilities, backgrounds, cultures, skills, experiences and perspectives while respecting human rights.
- **Neurodivergent:** Refers to a person with neurological functioning or behavioural traits that differ from what is considered typical.
- **Nothing without us:** A guiding principle introduced in *Nothing Without Us: A Public Service Accessibility Strategy* and adopted across the government of Canada to communicate the message that no policy should be decided by a representative without the full and direct participation of the members of the group affected by that policy.

- **Person with a disability or disabled person:** A person with a physical, mental, intellectual, cognitive, sensory, learning or communication impairment, or a functional limitation, whether apparent or not, and permanent, temporary or episodic in nature, that hinders their full and equal participation in society when they face a barrier.
- **Systemic barrier:** A barrier that results from seemingly neutral systems, practices, policies, traditions or cultures, and that disadvantages certain individuals or groups of people.

Annex A – Summary of findings from employee engagement

Consultations with the Joint ISC/CIRNAC Accessibility and Disability Employee Network were completed in the fall of 2022. During these sessions, sector leads presented key barriers identified from the questionnaire results and proposed actions to improve accessibility. This was followed by employees sharing their experiences and comments on the proposed actions.

The consultations included a series of six sessions organized by areas for action between October and November 2022. Below is a summary of feedback received in these sessions.

Employment

A first session took place on October 31st, 2022, and a second session on November 24th, 2022 to allocate additional time for this area. Highlights of feedback included:

- There is a need to train managers and supervisors on accessibility, duty to accommodate and accommodation measures as soon as possible.
- [Workplace Accessibility Passport](#) (Passport) is long, repetitive, and confusing for those trying to create one. Managers are also unsure of how the system works, making the process more difficult for employees.
- It was suggested that the Passport also include an employee's strengths and abilities, rather than only focusing on accommodation needs. This could reduce stigma that employees with disabilities experienced from their manager.
- Development opportunities for employees with disabilities are critical to advance within the department, rather than staying in entry-level positions.
- Hiring targets to increase representation of persons with disabilities needs to include a variety of disabilities to be representative of all disabilities.
- There is a need for tools and resources for employees with invisible disabilities.
- The goals set out in the accessibility plan need to be measurable in order to track progress over time and pin-point which areas need improvement after the implementation of the initial plan.
- Greater accommodation is needed for individuals with learning disabilities in relation to language requirements and second-language education opportunities.
- Suggestions were made to include more internal and external groups to gain insights into intersectionality with persons with disabilities, including a need to include indigenous employee equity groups in consultations.

Information and Communications Technology

The session took place on November 3, 2022. Two key messages from this feedback included:

- There is a need for a videoconferencing software with intelligent bilingual captioning that is able to switch between languages. While MS Teams already has captioning software, this software is only able to provide captions in one language at a time. This is insufficient for staff who require captioning software in order to fully participate in videoconferences.
- Existing technologies need to be reviewed for accessibility, and accessibility needs to be considered when selecting new technologies moving forward.

Communication

The session took place on November 10, 2022. Highlights of feedback included:

- There is a need for an increase in departmental-wide use of plain language in all methods of communication. Also, it would be important to develop a process to review plain language documents.
- There is a need for training about how to write in plain language. This training would also cover how to make content accessible and inclusive (e.g., how to prepare documents that are accessible by screen readers).
- French captions for videoconferences could be improved.

Built Environment and Procurement

A joint session on built environment and procurement took place on November 22, 2022. Highlights of feedback included:

- With the return to work in the office, there is a need for accommodation measures. The office modernization does not meet all needs of employees with disabilities. Employees may have sensory issues, or employees with anxiety may be unable to work in open areas. A possible solution is for employees with disabilities to request an accommodation measure of working remotely from their home office if this allows them to perform their work. Managers need to understand that this is a legal obligation related to the duty to accommodate.
- Emergency planning and management protocols were also identified as requiring an update, as the current directives are unclear for those with mobility impairments to be evacuated safely and promptly.
- An increase in the amount and ease of accessibility of braille signage in the workplace was also cited as necessary.
- Regarding procurement, there was a suggestion to have alternate formats for employees and vendors to submit requests or bids, such as through the use of video recordings.

Annex B – Summary of findings from external client engagement

In the fall of 2022, CIRNAC completed preliminary engagement with national and regional Indigenous partners who represented clients with disabilities. The input gathered from these interviews was used to identify the barriers and develop concrete actions including in the Design and delivery of program and services area of action. This engagement was a starting point and additional on-going engagement with external clients will be a critical part of the accessibility journey.

The following is a summary of findings including barriers and recommendations.

Barriers Identified

1. Barriers to accessing programs and services:

- Partners shared that the design of programs and services lacked an accessibility lens. This presents a barrier to external clients with disabilities in fully accessing CIRNAC programs and services. It was also mentioned that consideration of the unique needs of the three distinct Indigenous groups (First Nations, Inuit, and Métis) as well as Northerners is not always incorporated into new program and service development.
- It was reported that there is the perception that employees do not have the knowledge and understanding of how to best support and provide services to persons with disabilities. This can be frustrating to persons with disabilities that are attempting to access programs and services and require assistance due to a disability. When the assistance provided does not meet the need of the person, it presents a barrier to accessing the programs and service.
- It was expressed that there are a number of accessibility barriers clients with disabilities experience when completing program/service application forms. Barriers shared included that the application process and systems are complex, the location of regional offices in some areas makes the in-person option not feasible, there is no availability of information and application support in the client's preferred language, and there is no (or low) bandwidth for web content meaning there is no online connectivity. There was also a need for awareness regarding the current accessibility features and supports that CIRNAC offer. One example that was raised multiple times was the lack of awareness regarding the option for an individual to complete an application form on behalf of another person.

2. Barriers to externally posted or circulated information:

- The format of materials and information displayed on the CIRNAC website and/or externally circulated, such as program and service descriptions, documents, and forms are not always accessible. Language that is complex is used and can make it difficult for persons with disabilities to access and understand.
- There is no feedback mechanism to enable external clients to report accessibility issues, questions or challenges regarding programs and services.

Recommendations Identified

The following are the recommendations identified by partners to eliminate and prevent barriers to clients with disabilities:

- Employees who interact and support clients complete cultural awareness training and accessibility training to become better equipped to deliver programs and services to Indigenous people and persons with disabilities.
- CIRNAC increases awareness of alternative formats that clients with disabilities can use in application processes. An example of this is for clients to receive assistance with the completion of forms or have someone else complete the form on their behalf.
- Client engagement questionnaires include accessibility specific questions.
- Online content is made accessible and available in multiple formats such as large font, braille, American Sign Language (ASL), and Langue des signes québécoise (LSQ) and Indigenous Sign Languages. Also, online videos would include sign language and closed captions.