Accessibility Plan

Accessibility Plan at Indigenous Services Canada (ISC)

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Message from the Deputy Minister and Associate Deputy Minister

There is a teaching among our Peoples, that Persons with disabilities are a gift from the Creator to remind us of our humanity as they teach us to love, have compassion and be creative.

It is Persons with disabilities who inspire us - to progress our humanity by stimulating creative ideas - in order to make significant and meaningful changes to our world.

Knowledge Circle for Indigenous Inclusion

Indigenous Cultures, Protocols and Accessibility Resource Centre

We are pleased to introduce the first iteration of **Indigenous Services Canada's Accessibility Plan.** We share this Plan with you with humility, recognizing that much more effort remains before us. The mandate of Indigenous Services Canada requires an inclusive, diverse, equitable, culturally informed and safe, and accessible environment. The approach must be holistic and consider the diverse needs of all employees including those we endeavour to bring into our organization as we build a more accessible environment. As a relatively new department, we are still on a learning journey. As we continue to carry aspects of Canada's colonial legacy which can weigh heavily on our relationships with First Nations, Inuit and Métis Nation individuals, partners and communities, as well as employees, enabling transformative action and change can appear daunting. But every step forward in embracing diversity and breaking down barriers will empower us to move forward towards social justice and a substantively equal, prosperous future.

This plan is a work-in-progress. We are committing to continuing the engagement, evolving it as we listen and learn, and building on successful practices from one another, other departments, Indigenous partners and other organizations. In the development of this first iteration, we partnered with Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) to contribute towards the whole-of-government goal of becoming a barrier-free Canada by 2040. We are currently targeting actions over a three year period, but will be conducting an annual review of the plan to make sure it is not stagnant, builds upon strengths and improves as needed.

We want to thank members of the ISC and CIRNAC Employee Network on Accessibility and Persons with Disabilities, our Accessibility Champion, and the internal services team leads who worked collaboratively to contribute to this work. We will be engaging more broadly in the weeks and months ahead, including by supporting the work of the Knowledge Centre of Indigenous Inclusion who are initiating exciting work towards an Indigenous Cultures, Protocol and Accessibility Resource Centre. We have agreed to co-chair the Interdepartmental Indigenous Accessibility Collaborators Circle and engaging our Chief Data Officer on the Accommodations Survey with Indigenous employees across the public service. There are also direct linkages between this work and the intersectional and GBA Plus community of practice that is increasing knowledge, training and capacity across the Department to protect against discrimination and promote inclusivity.

The plan is intended to contribute to the Government's commitment to the *Accessible Canada Act*, which came into effect in 2019. The plan lists an initial list of priority areas for action and related steps

that must be taken to identify, remove and prevent barriers to accessibility in the workplace and in ISC policies, programs and services for First Nations, Inuit and Métis. This is a significant, ambitious goal that will require engagement, resources and capacity to address across all of ISC's areas of responsibility. It will also be key to recognize that ISC's mandate is to advance self-determination of First Nations, Inuit and the Métis Nation. While this initial plan is focused on advancing accessibility within ISC's workplace mainly, we are committed to working with First Nations, Inuit and Métis Nation partners to support them in advancing accessibility.

Accessibility means working together to create a caring and inclusive workplace where persons with disabilities feel included, can participate fully and feel like they belong—resulting in an improved and barrier-free workplace for all. Barriers are not always visible. They can be insidious and systemic. Racism is one such barrier that can intersect with an individual's ability to create unique experiences of marginalization and oppression.

ISC has an opportunity to, not only advocate for public service workplace accessibility, but also to advocate for the opportunity of First Nations, Inuit and Métis Nation partners to offer stronger workplaces, supports for their members, and equity for persons with disabilities.

Merci / Thank you / Wela'lin / Ekosani / Miigwech / Meegwetch / Marsee / Mahseecho / Mutna / Wopida / Gunałchéesh / Hei Hei / Marci Cho / ᖁᐊᓇᖅᑯᑎᑦ / Quanaqqutit / Nakurmik / Kukwstsétsemc / Tiawenhk / Woliwun

Gina Wilson
Deputy Minister, Indigenous Services Canada

Valerie Gideon
Associate Deputy Minister, Indigenous Services 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) require all federally regulated entities to prepare and publish Accessibility Plans by December 31, 2022. Indigenous Services Canada is uniquely positioned to advance this work with First Nations, Inuit and Métis individuals, families and communities, as well as the Department's employees in mind. Accessibility must be considered holistically and as a continuum of culture, support, listening, learning, hope, caring and action. Transformative change requires a change in how an organization understands, values, makes decisions and implements with accountability.

Please consider how you can contribute to this critical, historic time when accessibility is being prioritized and when your voice can be heard. For those who have not experienced accessibility issues in the workplace, you can also contribute by taking the time to listen and make space to elevate the voices of your colleagues who have or are currently facing barriers. We all have a role to play in this.

Using the contact information below, you are invited to provide feedback on barriers to accessibility and on this first iteration of ISC's Accessibility Plan. You may submit feedback anonymously by choosing not provide personal information. We will acknowledge receipt of all accessibility feedback received, and if asked for a response we will communicate in the same way that the feedback was received. Only feedback submitted anonymously will not receive a response or receipt of acknowledgement.

You may also use this contact information to request a copy of the Accessibility Plan in an alternate format (such as large font, braille, American Sign Language [ASL] and langue des signes québécoise [LSQ]), or to request a copy of the feedback process in an alternate format.

The CIRNAC Senior Policy Advisor on accessibility is designated to receive feedback or alternate format requests on behalf of ISC and CIRNAC.

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

Mail:

> Crown-Indigenous and Northern Affairs Canada
> ACA Implementation Secretariat
> 15 Eddy Street
> Postal stop 15-4
> Gatineau, Quebec K1A 0H4
> Canada

Phone: 1-800-567-9604

Executive summary

The Government of Canada is recognizing the meaning and importance of accessibility and is committed to becoming barrier-free by 2040. ISC is proud to contribute to improving accessibility to ensure that all individuals living and working in Canada can fully participate, contribute to the workplace and are able to access all programs, supports and services. ISC's mandate brings an important focus to the strengths, needs, rights and self-determination of First Nations, Inuit and the Métis Nation. To gain insights into barriers to accessibility, the organization consulted its employees with disabilities and conducted an initial set of interviews among national and regional Indigenous partners across Canada. This is only the beginning of a journey towards recognition, respect, truth, hope, and, ultimately, reconciliation.

The foundation for the plan is inspired by the main areas for action listed under the *Accessible Canada Act* (ACA): employment, built environment, information and communications technologies (ICT), communications (other than information and communication technologies), procurement, and design and delivery of programs and services.

Internal Engagement

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

With respect to all areas, training was highlighted to support accommodation and the review of existing infrastructure, supports and services against accessibility standards.

External Engagement

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, as well as a greater understanding of the reality faced by clients with disabilities and their accessibility needs. It is important for these programs and services to be supported by a feedback mechanism so clients can make suggestions to improve programs, supports and services.

The next steps for this Plan include a more fulsome engagement across the organization and with partners, completing a cost analysis to address resource and capacity needs both internal and external, in support of First Nations, Inuit and Métis Nation partners. Examples underway are: the co-development of recommendations for a continuum of long-term care with Indigenous partners; the reform of the First Nations On-Reserve Income Assistance Program; and the Jordan's Principle long-term reform approach.

About this Plan

This Accessibility Plan applies to two regulated organizations: Indigenous Services Canada (ISC) and Indian Oil and Gas Canada (IOGC). The Department understands that Schedule V of the *Financial Administration Act* applies to IOGC, however IOGC is under ISC's financial structure and is not considered a separate entity in terms of financial reporting in the department. Therefore IOGC is included and supported by the Plan.

Areas described under article 5 of the *Accessible Canada Act*

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

Some of these areas overlap or are interdependent. The design and delivery of programs and services area focuses on barriers and actions related to improving accessibility for external clients with disabilities. With respect to ISC, we mainly fund Indigenous partners and communities to deliver services; however, we also continue to provide direct service delivery in a few areas including: *Indian Act*

status registration, Jordan's Principle, Non-Insured Health Benefits, education, primary care and public health nursing, environmental public health. As well, in the context of our ongoing funding relationship, we have many direct and regular contacts with First Nations, Inuit and Métis Nation partners. We also have a policy and, at times, governance relationship with some Indigenous partners such as in the case the British Columbia First Nations Health Authority, Indigenous self-governing, Modern Treaty holders, Inuit land claim organizations and national, regional and sub-regional representative Indigenous organizations.

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 engagement to date;
- barriers identified by internal and external engagement participants (within the limited timeframe); and,
- actions with concrete steps to remove and prevent those barriers, including timelines, roles and responsibilities, and intended outcomes with measurements.

This initial plan respects, and is integrated within, our department's policies, programs, practices and services. Persons with disabilities have been engaged to identify and provide advice about barriers, which are reflected in the following areas for action within limitations of time and capacity. It is critical to recognize that this plan will evolve as we listen and learn.

Employment

This area for action includes aspects of the workplace such as job interviews, training, performance evaluations, and accommodation requests. Examples of barriers in this area include job postings that are not formatted for assistive technologies like screen readers, assuming that someone cannot do certain kinds of work because of their disability or imposing requirements for a job that do not recognize systemic barriers to accessing higher education or particular experiences and knowledges.

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 human resource services are shared between ISC and Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC). Employee networks and departmental champions are actively involved in promoting diversity, inclusion and anti-racism and support HRWSB in fulfilling this mandate. The Director General of Individual Affairs is the ISC Champion. ISC has funded a full-time coordinator to support this role.

Vision of accessible employment:

In 2040, ISC is recognized as an employer of choice for persons with disabilities, with an important focus on Indigenous employees. The Department provides welcoming language and barrier-free processes, accessible job postings, equitable and culturally-informed 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 lots of feedback and suggestions from the employees consulted. Highlights from the consultations include:

- 46.6% of people living with a disability have discussed their disability with a supervisor or manager, while 22.3% do not feel comfortable discussing it.

- 25.8% of total respondents feel they have experienced attitudinal barriers at work, and 17.0% of respondents have observed co-workers experiencing such barriers.

- There are difficulties in applying the Passport, which is a document that allows people with disabilities to register their accommodation needs and not have to reapply when they change positions or departments. In fact, 77.3% of respondents with disabilities were not aware of the Accessibility Passport, while 1.7% of respondents have already implemented one.

- Regarding requests for accommodation, 50% of people living with disabilities who have requested accommodation in the past two years have received their accommodation, 5.0% have been refused, and 37.5% indicated that their request was in progress. Finally, 7.5% received a measure, but did not receive the specific accommodation requested.

- 16.1% of those living with disabilities felt very satisfied with the ergonomic or adaptive equipment provided to them to do their work, while 31.6% felt satisfied, 7.7% not very satisfied, and 11% very dissatisfied (33.6% 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 people with disabilities are needed to achieve a more diverse workforce.

- More emphasis needs to be placed on consultation with other employment equity groups, such as Indigenous employee groups living with disabilities.

- 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 ISC 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:** Launch in January 2023 and completed by 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:** Train more managers on their role and responsibilities in responding to accommodation measures.
  - **Timelines:** Launched in January 2023 and completed by December 2024
    Roles and responsibilities: The CAMWW establishes a partnership with the Workplace Effectiveness Directorate to identify and promote appropriate training.
  - **Intended outcome:** Training for managers is promoted and the number of managers who have taken the training is available.

- **Action 3:** Create a VIP team to expedite the processing and procurement of all accommodation request items.
  - **Timelines:** Launched in January 2023 and completed by 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:** Launched in January 2023 and completed by 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:** Continue targeted hiring processes for people with disabilities, based on SAC's hiring objectives for people with disabilities, which are based on the availability of this workforce in the active population.
  - **Timelines:** Launched in January 2023 and completed by 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.
  - o **Timelines:** Launched in January 2023 and completed by December 2025
  - o **Roles and responsibilities:** The CAMWW plans and establishes the specialized team.
  - o **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.
  - o **Timelines:** Launched in January 2023 and completed by March 2023
  - o **Roles and responsibilities:** The study will be conducted by the Workplace Effectiveness Directorate.
  - o **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 creating opportunities for persons with disabilities.

- **Action 2:** Promote available training for managers and human resource advisors to identify barriers to accessibility in the hiring process.
  - o **Timelines:** Launched in January 2023 and completed by December 2025
  - o **Roles and responsibilities:** The Regional Client Services Directorate and the CAMWW develop promotional tools for the training sessions and mobilize the five service centers to disseminate information to all human resources advisors and managers. The CAMWW tracks attendance at these sessions.
  - o **Intended outcome:** Human resources advisors and managers have received training.

- **Action 3:** The new self-declaration form and its importance are promoted so that targets can be set to hire people with diverse disability situations.
  - o **Timelines:** Launched in January 2023 and completed by March 2025
  - o **Roles and responsibilities:** Workplace Effectiveness Directorate develops materials to promote and raise awareness of the new form.
  - o **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: Anchor accessibility in the ISC culture by mandating training for all employees and managers to promote the inclusion of people with disabilities and to remove barriers to accessibility.

- o **Timeline:** Launched in January 2023 and completed by March 2024

- o **Roles and Responsibilities:** The CAMWW develops promotional tools for the training and disseminates information to all employees and managers and tracks attendance at these sessions. The Organizational Effectiveness Directorate adds this training to the learning path of employees and managers.
  - o **Expected Results:** All employees and managers have received the training.

- **Action 2:** Develop communications and tools that enable managers to integrate work objectives into performance evaluations based on the accommodation needs of persons with disabilities.
  - o **Timelines:** Launched in January 2023 and completed by December 2024
  - o **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.
  - o **Intended outcome:** A communication plan and tools are developed to support managers. The tools include the GBA Plus competency grid developed by the GBA Plus Responsibility Center.

- **Action 3**: Return to work cases following a disability absence are specifically monitored to minimize the risk of error on the pay of employees affected by this type of absence.
  - o **Timeline:** Launched in January 2023 and completed by March 2023
  - o **Roles and Responsibilities:** The CAMWW maintains a log of all open cases of disability leaves and connects with the Compensation Liaison Office. An employee from Compensation Liaison Office is dedicated to these cases and follows up with the Public Services and Procurement Canada (PSAC) Pay Centre.
  - o **Expected results:** Payroll errors are minimized and when they occur, a member of the Compensation Liaison Office is dedicated to accompanying the employee affected by the situation so that it is resolved as quickly as possible.

Built environment

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, ISC is a tenant of PSPCand occupies space in both Crown and commercially leased buildings. The National Accommodations sector provides a shared service to ISC and CIRNAC. When changes are made to the buildings, ISC 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, ISC provides accessible workspaces for persons with disabilities. Our built environments are barrier-free.

As one of the dimensions of the [ISC Modern Workplace](#) strategy, the department built environment is being designed to be accessible, flexible, inclusive and culturally safe, taking into consideration diversity, including gender diversity as well as Indigenous culture.

As part of the modernization of its offices across the country, ISC, in partnership with PSPC has implemented and will continue to implement many of the best practices featured by Accessibility Standards Canada including but not limited to:

- Doors with power door operators;
- Sliding doors in boardrooms;
- Accessible, universal washrooms with emergency button;
- Lower height counters in kitchens and bathrooms;
- Height accessible equipment locations;
- Light alarms that complement Sound alarms for emergency evacuations.

ISC will continue its partnership with PSPC to incorporate Indigenous design in its office modernization projects to reflect and be representative of Indigenous cultures by: a) facilitating Indigenous inclusion and engagement in the workplace, both before and after occupancy, and b) celebrating the inherent emphasis on health and well-being and environmental sustainability within Indigenous cultures and values.

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:

- 17.3% of those living with a disability indicated that their current office building was fully accessible, 18.8% indicated that it was very accessible, 24.8% indicated that it was somewhat accessible, and 9.8% indicated that it was not accessible (29.3% 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.

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

Actions to address barrier 1:

- **Action:** Office space modernization projects to implement Government of Canada Workplace fit-up standard to build accessible universal washrooms.
  - **Timelines:**
    - In 2022, modernization project in the NCR at 9 Montclair and in Quebec at 320 St-Joseph
    - By 2023, modernization project in the NCR at Jeanne Mance building and in Vancouver, British-Colombia (B-C) at 1138 Melville

- By 2025, modernization project in Edmonton, Alberta, at Canada Place
- By 2026, modernization project in the NCR at Terrasses de la Chaudière
- By 2027, modernization project in Winnipeg, Manitoba, at 391 York
  - o **Roles and responsibilities:** The National Accommodation Directorate, in partnership with PSPC or building management companies, ensures that universal washrooms are included in all retrofit project.
  - o **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 Government of Canada Workplace fit-up standard. All new builds or retrofits will be accessible by design and automatic door openers will be installed by default.
  - o **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
  - o **Roles and responsibilities:** The National Accommodations Directorate, in partnership with PSPC or building management companies, ensures that retrofit project includes automatic door openers for collaborative spaces.
  - o **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 to corridors.

Actions to address barrier 3:

- **Action:** Review and identify areas in office spaces in need of improvement for accessibility.
  - o **Timelines:** By December 2023
  - o **Roles and responsibilities:** The National Accommodations Directorate, in partnership with PSPC or building management companies, complete the review of office spaces.
  - o **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 ISC, 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 ISC and CIRNAC. 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 and the department is prepared to procure new equipment as needed in a timely manner. 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 policy area generated proposals from the employees consulted. Here are some highlights from these consultations:

- 27.9% of people living with disabilities felt well supported by IT specialists when they needed help using their accessible software and technologies, 16.3% of respondents said they did not feel supported but still managed, and 8.2% responded that they did not feel supported and did not know whom to ask (47,6% answered "Not Applicable").

- 84.1% of respondents felt that virtual meetings were fully accessible to them, 13% felt that these meetings were partially accessible, and 2.8% felt that these meetings were not accessible.

- Employees identified a need for adaptive computer technology in meetings, e.g., intelligent closed captioning software for virtual bilingual meetings.

- Employees indicated a need to increase awareness among new employees of the types of non-standard equipment that may be available when needed.

- There are difficulties and delays in selecting and receiving the adaptive technologies needed to perform their work.

- 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).

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 experts supporting 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 ISC.
  - **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.
  - o **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).
  - o **Timeline:** By April 2024
  - o **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.
  - o **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 employees will involve change, which 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.
  - o **Timelines:** By April 2024
  - o **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.
  - o **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.
  - o **Timelines:** By April 2025
  - o **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.
  - o **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: Action 3:** Anchor accessibility within ISC's culture by mandating accessibility training for IM-IT professionals and incorporation into Performance Management Agreement objectives.
  - o **Timelines:** By October 2025
  - o **Roles and responsibilities:**
    - o IM--IT Accessibility Champion will continue to work with partners and working groups to identify barriers and promote awareness and communications.
    - o IM--IT management will identify appropriate accessibility training for employees and include objectives in performance Management Agreements where applicable.
  - o **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.

Action to address barrier 3:

- **Action 1:** Incorporate accessibility requirements and additional funding requirements within the Departmental Plan, in the Service and Digital area, for fiscal year 2023-24 and beyond. Submit departmental funding requirements through the annual investment planning exercise for sustainable funding.
  - o **Timelines:** By April 2024
  - o **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.
  - o **Intended outcome:** A supplementary budget is incorporated into future IM-IT financial planning.

Communication, other than information and communication technologies

This area of action includes the ways that people give, receive and understand information. People 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, communications assistants and sign language interpreters also help to make communications accessible for everyone. The *Accessible Canada 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 ISC and CIRNAC. 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 communications action area has generated information and proposals from the employees consulted. Some highlights from these consultations include:

- 58.5% of survey respondents who identified themselves as people living with disabilities are always able to communicate/receive communications in their preferred method(s), 35.4% are sometimes able to do so, 1.5% are never able to do so, and 4.6% do not know.

- 63% of respondents feel they would benefit from training to make materials more accessible, 19.1% say they would not, and 17.9% are unsure.

- 45.7% of respondents felt that workplace communications are written in plain language, 11.3% felt that communications are not written in plain language, 38.5% felt that communications are sometimes written in plain language, and 4.5% did not know.

- Respondents identified a lack of 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:** Launch January 2023 and completed by 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:** Launch by January 2023 and completed by 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:** Launch in January 2023 and completed by 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:** Launch in January 2023 and completed by 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 that contains inaccessible information.

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:** Launch in January 2023 and completed by 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 ISC and not publishing content that does not meet these standards. An alternative format that is accessible is suggested. ISC to establish a working group to identify accessible formats and web applications.
  - **Timelines:** Launch in January 2023 and completed by 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 (purchasing and renting things and places)

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

Specific information about this area of action:

Procurement services enables 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.

ISC is committed to reconciliation with Indigenous peoples and will continue to explore all available avenues for increasing opportunities for Indigenous businesses to participate in federal procurement

processes. The Departmental programs in collaboration with procurement are working on strengthening procurement policies and mechanisms in support of the Procurement Strategy for Indigenous Business.

ISC will ensure that the Accessibility measures planned to eliminate barriers in procurement are equally implemented under the departmental procurement strategy for Indigenous Business.

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 *Accessible Canada Act* 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.
  - o **Timelines:** Launch in January 2023 and completed by December 2023
  - o **Roles and responsibilities:** Procurement Services is responsible to write and submit the internal article. Communications are responsible for the publication.
  - o **Intended outcome:** One (1) publication per year.

- **Action 2:** Require business owners, TA, and employees to include accessibility considerations in a pre-procurement checklist.
  - o **Timelines:** Launch in January 2023 and completed by December 2023
  - o **Roles and responsibilities:** Procurement Services to review the Pre-procurement checklist. Internal Forms to produce and distribute the form.
  - o **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 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.

- o **Timelines:** Launch in January 2023 and completed by December 2025
- o **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 PSPC.
- o **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, ISC will review the level of accessibility of its programs and services for Indigenous individuals with disabilities to support planning, development and implementation of programs and services for these to be inclusive by design and accessible by default. ISC will also develop standards for accessibility that include best practices, tools, and training.

Design and delivery of programs and services vision for accessibility:

In accordance with the *Department of Indigenous Services Act*, Indigenous Services Canada continues to work toward changing how it can better support the rights and priorities of Indigenous Peoples. As per Section 7(b) of the Act, the department will continue to "take the appropriate measures to give effect to the gradual transfer to Indigenous organizations of departmental responsibilities with respect to the development and provision of those services". In keeping with our transfer mandate, ISC will be increasingly working with Indigenous partners to ensure services are delivered independently by Indigenous partners to their communities. The transfer of services must be Indigenous-led, accessible, and affirm the right of self-determination.

In the interim, the design and delivery of programs and services provided by ISC are inclusive and accessible-by-design to meet the needs of Indigenous clients and employees. The department continues to work toward ensuring that service transfer arrangements protect and promote accessibility. 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 has a greater need for an accessibility lens co-developed with Indigenous partners. This presents a barrier to external clients with disabilities in fully accessing ISC programs and services.

Actions to address barrier 1:

- Build on existing distinction-based partnerships that are in place and the various commitments ISC has already made for programs and services reform across the various program areas. Ensure that Indigenous persons with lived experiences of disabilities are represented and bring their expertise.

- Building in accessibility from the start is key to ensuring that programs, services, tools, and applications can be used by everyone.

- Ways that ISC will incorporate inclusive by design and accessible by default practices are as follows:
    - Work with Indigenous partners and communities to co-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.
    - Ensure Indigenous governments and partners administering ISC-funded services have access to sufficient, predictable and sustained funding to address barriers and gaps related to the training, hiring, and retention of culturally-competent service providers.
    - 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 people of all abilities no matter how they access the program or service.
    - Until such a time that ISC's transfer mandate is fully achieved, co-developing and co-designing legislation, policy, and programs and services with Indigenous partners as a precursor to the effective transfer of responsibility of services, ensuring their priorities are met in the process.
    - 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.
    - Leverage the work being undertaken with respect to modernization and transformation of programs and services, including through the adoption of a digital mindset and digital service delivery approach.

    - **Timelines:** Building on existing engagements and completed by March 2025
    - **Roles and responsibilities:** Program Authorities
    - **Intended outcomes:**
        - All new programs and services are designed with accessibility in mind.
        - New programs and services piloted with persons with disabilities to ensure accessibility by design.
        - Programs and services that 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

- ISC is co-developing a strategy with First Nations, Metis, and Inuit partners to address gaps in the continuum of care in Indigenous communities in response to the 2018 Report of the Standing Committee on Indigenous and Northern Affairs (INAN), *The Challenges of Delivering Continuing Care in First Nations Communities*. Engagement, which has been underway since 2019, is being led to collect information and support this process with First Nations, Metis, and Inuit partners across the country. A report based on what was heard during these engagement sessions is being drafted to inform co-developed options to improve existing services or expand services to address gaps. The options are meant to be ambitious and to support long-term improvements to support those in need, including people living with disabilities and Elders.

- Conduct a review of existing programs and services leveraging existing reports and assessment mechanisms, such as GBA Plus. The review will further investigate accessibility 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, ISC 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. ISC will ensure processes are in place so that accessibility related feedback and requests submitted can be addressed in a timely manner.

  - **Timelines:** Building on existing engagements and completed by 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. ISC 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 ensure accessibility and cultural competence in their work.

  - o **Timelines:** Launch in January 2023 and completed by March 2025
  - o **Responsibility:** HRWSB and Program Authorities
  - o **Intended outcomes:** Accessibility standards and training are provided to all employees on how to respond to accessibility needs of clients.

Barrier 4 : It has been expressed that there are several barriers that clients with disabilities experience when completing program and service application forms. Some examples of barriers that were shared 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. There is also a need for increased awareness of the accessibility features and supports that ISC 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.
- Additionally, work with other government departments to continue to learn accessibility best practices. From this, make improvements to application forms, processes and support available. This will help to better define accessible service offerings. It will also result in communications that can be provided to clients to better inform them of what ISC can do to remove barriers during any type of external client service experience.

  - o **Timelines:** Launch in January 2023 and completed by March 2025
  - o **Responsibility:** Communications, IM-IT and Program Authorities
  - o **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 ISC 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

Specific information about this area of action:

Despite holding internal and external consultations, no specific transportation barriers, were identified. However, potential transportation barriers remain a concern. ISC has been taking steps in recent years to reduce potential transportation barriers to access our services, considering that many Indigenous Canadians who access our services live in the North, in isolated and remote communities where transportation infrastructure is limited or non-existent.

Vision regarding accessible transportation:

ISC has been and will continue to increase points of service, so that Indigenous Canadians can access services directly in their communities or digitally, hence reducing barriers with respect to transportation. Funding will continue to be provided to communities to facilitate the purchase of accessible vehicles to transport community members with disabilities.

Given the importance that the Accessibility Plan is developed through consultation and feedback, it is integral that the organization further develops this pillar in consultation with the individuals who are experiencing the barriers, recognizing that a deeper understanding of existing or future potential barriers is required. As a result, ISC will be working in 2024 and 2025 to further explore the transportation area of action with stakeholders both internally and with Indigenous communities and organizations across Canada.

What we heard in consultations:

During some of the external consultations however, stories were shared of individuals with disabilities flying into and out of remote and isolated communities in the North, the challenges faced to get into and out of the plane and the impact to their dignity. ISC recognizes that while the department does not provide some of these transportation services directly, barriers in transportation do have an impact on individuals receiving services from our organization, as well as when employees travel for business related purposes on behalf of ISC.

As a result and as an immediate response, we will start with the following barrier and initial actions, while we further consult internally and externally.

Barrier 1: Travel services providers do not always treat travelers with disabilities with respect and dignity or provide satisfactory accommodation to meet the traveler's needs.

Actions to address barrier 1:

- **Action 1:**Prepare new or amend existing communications to ensure that our clients are aware of how to request accommodation when they travel for medical or dental care.

    - **Timelines**: Completed by December 2024
    - **Intended outcome**: Increased client awareness of their right to be accommodated when traveling to receive non-insured health services and of the policies and processes that apply.

- **Action 2:** Prepare new or amend existing communications to ensure that employees with disabilities are aware that they have the right to be accommodated when traveling.
    - **Timelines**: Completed by April 2024
    - **Intended outcome:** Increased employee awareness of their right to be accommodated when traveling on government business and of the policies, processes and directives that apply.

- **Action 3:** Develop targeted feedback mechanisms related to travel and transportation to gather more information about the needs and experiences of ISC employees and clients.
    - **Timelines:** Completed by December 2025
    - **Intended outcome:** The information is used to address improvements with respect to travel services directly with the service providers.

- **Action 4:** Develop and provide training to employees with outward-facing, client interaction roles to ensure that there is an awareness of accessible services solutions available to assist clients with disabilities to access our services.
    - **Timelines:** Development completed and begin providing the training by December 2025
    - **Intended outcome:** At all levels of the organization, there is an understanding and awareness of the accessible service solutions, and there is an active offer to accommodate when clients interact with employees of ISC to ensure accessibility needs are identified and that accommodation are offered, if requested.

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 and has a membership. 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 CIRNAC Senior Policy Advisor on accessibility was designated to receive feedback on behalf of ISC and CIRNAC.

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 302 people completed the questionnaire. Here is how the respondents identified themselves and the corresponding percentages:

- o Person living with a disability: 38 %;
- o Ally of or employee of a person living with a disability: 32 %;
- o Supervisor or manager of a person living with a disability: 20%;
- o None of the above: 10 %.

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 engagement 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 ISC and CIRNAC'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 for action of the accessibility 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 ISC and CIRNAC.

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.

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 people 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 identities 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 people'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, ISC 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 ISC 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 ISC 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.
- ISC provides a number of health-related programs and services that either directly or in-directly support persons with disabilities and positive feedback was received about some of these programs and services. It was also shared in the engagement sessions by external clients that there are program and service gaps present in regard to health-related services for persons with disabilities, where either additional programs and services should be added or existing programs and services should be expanded upon.

2. Barriers to externally posted or circulated information:

- The format of materials and information displayed on the ISC 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.
- ISC 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.
- ISC expand and improve health related programs where possible to better support persons with disabilities so that they do not need to travel away from or reside outside of their communities in order to access health-related programs and services. For example, through the expansion of the Home Care program. It was also recommended that ISC increase the awareness and promotion of existing health related programs and services that either directly or indirectly support persons with disabilities.