



Office of the Superintendent of Financial Institutions Accessibility Plan Progress Report 2024

December 19, 2024



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Office of the Superintendent of Financial Institutions

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1. General

1.1 Contact information

The accessibility lead for OSFI is the Human Resources Division's Diversity, Equity, and Inclusion team. For more information, to provide feedback, to receive a description of our feedback process, or to request alternate formats of this Progress Report, please contact:

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

Address:

Diversity, Equity, and Inclusion Advisor
255 Albert Street, 12th Floor
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Telephone number: 1-800-385-8647

TTY: 1-800-465-7735

Fax: 613-990-5591

Feedback can be submitted anonymously or with personal information identified.

All feedback will be acknowledged through the same means by which it was received, unless it was received anonymously.

If the feedback was not submitted anonymously, it will be acknowledged through the same means it was received within 15 business days.

1.2 Background on Office of the Superintendent of Financial Institutions

The Office of the Superintendent of Financial Institutions (OSFI) is an independent federal government agency that regulates and supervises more than 400 federally regulated financial institutions and 1,200 pension plans to determine whether they are in sound financial condition and have adequate protections against threats to their integrity and security. OSFI analyzes financial and economic trends to identify emerging issues that could adversely affect institutions. OSFI is a Schedule V agency under the *Financial Administration Act* (FAA) and governed by the *Public Service Employment Act* (PSEA).

OSFI is committed to supporting accessibility at all levels of our workforce. At OSFI, we are working on creating a barrier-free environment so that employees with disabilities are not prevented from providing their expertise in their service to Canada. We also want to make sure that the needs of any person with disabilities visiting our premises are always considered and met. We at OSFI understand that creating accessible and inclusive environments is a strategic necessity for achieving our mandate. We are also dedicated to helping create a more accessible Canada.

1.3 Accessibility statement

OSFI's accessibility vision is to create a fully accessible, respectful, and inclusive workplace that values and enables disabled persons. While we develop our enterprise-wide Accessibility Strategy, we have created this Accessibility Plan following the framework identified in the Accessible Canada Regulations. The Diversity, Equity, and Inclusion Team is leading this work, but every employee at OSFI is responsible for learning about accessibility and demonstrating inclusion in their work, their workplace and their behaviours. We all have an important role to play.

To achieve that vision, the Accessibility Plan and progress reports are designed to help all employees:

- Learn about accessibility and understand how barriers affect disabled persons

- Involve disabled persons during all phases of policy or program development/review
- Design experiences to be more accessible and inclusive
- Make communications accessible for everyone
- Develop the knowledge and skills to provide accessible programs and services
- Contribute to a culture of accessibility

OSFI's Accessibility Plan and its progress reports address the following key elements that create change and drive a culture of accessibility:

1. Policies, programs and procedures: OSFI will apply an accessibility lens and update its policies and programs to provide clarity and consistency about what needs to be done, how it needs to be done and who is responsible for doing it.
2. Training and learning: OSFI employees will receive training to understand the new policies, programs and processes, and their role in implementing them.
3. Communications: OSFI will integrate accessibility into internal and external communications and support staff in applying this in their work.
4. Key process integration: OSFI will integrate accessibility into every aspect of the design and delivery of its work.
5. Procurement: OSFI enters into contracts for external services and supplies. OSFI will apply an accessibility lens at every stage of the procurement life cycle.
6. Prioritization: Leadership will consider all the elements of the Accessibility Plan and will prioritize which to address first. This will be based on actions that make the biggest impact, build momentum, and drive change.

1.4 Definitions and key terminology

Accessibility

Accessibility refers to how services, technology, locations, devices, environments, and products are designed to accommodate persons with disabilities. Accessibility means giving people of all abilities equal opportunities to take part in life activities. The term

implies conscious planning, design, and/or effort to make sure something is barrier-free to persons with disabilities. Accessibility also benefits the general population by making everything more usable and practical for all people.

Accessible Canada Act (ACA) Priority Areas

According to the *Accessible Canada Act* (2019):

The ACA priority areas refer to barriers in federal jurisdiction in the following seven priority areas: Employment, Built environment, Information and communication technologies (ICT), Communication, Procurement of goods, services and facilities, Design and delivery of programs and services, and Transportation.

Barrier

According to the *Accessible Canada Act* (2019):

“Barrier means anything – including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice – that hinders the full and equal participation in society of persons with a physical, mental, intellectual, learning, communication or sensory impairment or a functional limitation.”

Disability

According to the *Accessible Canada Act* (2019), disability is:

“A physical, mental, intellectual, learning, communication or sensory impairment – or a functional limitation – whether permanent, temporary or episodic in nature, that, in interaction with a barrier, hinders a person’s full and equal participation in society.”

Anyone can identify as a person with a disability (PWD) if they experience one or more of these impairments or functional limitations that, in interaction with a barrier, hinders their full and equal participation in society.

Duty to Accommodate

According to the Canadian Human Rights Commission:

“Duty to Accommodate is a legal obligation (pursuant to sections 2 and 15 of the *Canadian Human Rights Act*) that requires employers to identify and remove barriers that have an adverse impact on employees protected under the *Act* and to implement measures necessary to allow these employees to perform their duties to the best of their abilities.”

Federal public service

Refers to the core public administration (departments and agencies named in Schedules I and IV of FAA, for which the Treasury Board Secretariat is the employer) and separate agencies (organizations named in Schedule V of the FAA).

Accessibility, Accommodation and Adaptive Computer Technology Program

The Accessibility, Accommodation and Adaptive Computer Technology (AAACT) Program offers public servants with disabilities a wide range of adaptive computer technologies, tools, training, services, and resources. The goal of the AAACT program is to help the public service support departments who offer programs and services to Canadians and to build accessible workplaces with equal opportunities for all employees.

Promising practices

The promising practices presented under sections 5.1 to 5.7 of this plan are a short summary of the actions that OSFI is already taking to improve accessibility in the regulatory priority areas.

Planned action

The planned actions are presented under sections 5.1 to 5.7 of this plan. Some of these planned actions may have already begun and others may not yet have started.

2. Consultations

For this progress report, the Diversity, Equity, and Inclusion team consulted with all employees through our first Annual Accessibility Survey. The online survey focused on measuring our progress across the seven accessibility priorities of the *Accessible Canada*

Act (ACA). We gathered feedback on various aspects of employees' working environments and experiences as they relate to accessibility and accessibility barriers. Our Accessibility Implementation Working Group (AIWG) will use the survey findings to help guide their work, and the planning and development of our next Accessibility Plan.

We received 488 responses, for a response rate of 38%. Of those responding, 1 in 5 (21%) disclosed they had a disability.

Employees shared some positive feedback on our progress, for example:

- employees who joined OSFI in the last 2 years reported experiencing fewer barriers during their staffing process than had previous employees (14% compared to 22% for those having joined 3 or more years ago)
- most respondents (96%) considered virtual meetings and events to be fully accessible, with agreement slightly lower from persons with disability at 90%
- 68% of respondents involved in procurement processes identified at least one step of the process in which accessibility requirements had been outlined

Feedback from our employees is essential to help us continue to identify, address, and prevent barriers in our workplace.

Respondents identified the following issues:

- more barriers during their onboarding than those who joined earlier (38% in the last year compared to 21% 1-2 years and 12% 3 years or more ago)
- lack of awareness of accessibility tools and resources available to them across all priority areas
- lack of or limited awareness of the accommodations process
- lack of comfort in disclosing disabilities in our Human Resource Management System and/or requesting an accommodation
- lack of clarity around roles and responsibilities of internal partners to support accommodations

- sensory issues experienced in our physical office environment and lack of options or support to mitigate them

3. Our progress

In 2024, we made progress across 20 of 26 actions contained in [OSFI's Accessibility Plan \(/en/about-osfi/reports-publications/office-superintendent-financial-institutions-accessibility-plan-2023-2026\)](/en/about-osfi/reports-publications/office-superintendent-financial-institutions-accessibility-plan-2023-2026), each with varying timelines and steps toward achieving end goals.

Our Accessibility Plan originally had 16 actions, and through consultations for our 2023 Accessibility Progress Report, we added 10 actions.

The 26 actions follow these planned timelines:

- 5 short-term actions: projected to be completed within 1 year
- 20 medium-term actions: estimated to take 1 to 3 years
- 1 long-term action: requiring 3 or more years to complete

4. Governance

In our 2023 progress report, we identified the need for a more robust governance structure to enact our Accessibility Plan.

In February 2024, our Executive Committee approved the creation of the Accessibility Implementation Working Group (AIWG). The AIWG is a standing working group that reports through our formal governance structure. It consists of:

- An executive Sponsor
- Advisors for early consultation, including the Mental Health and Accessibility stream of our Inclusion Network (IN) and the Employment Equity, Diversity and Advisory Committee (EEDAC)

- Subject matter experts representing each of the Accessible Canada Act priority areas of our Accessibility Plan

The working group coordinates action planning across functional areas to help address accessibility barriers. The accessibility survey findings are one of the tools to help guide their work, and the planning and development of our next 3-year accessibility plan.

Members of the working group also act as change agents and advocates for persons with disabilities in their areas of work to identify, remove, and prevent barriers.

5. Priority areas

The seven priority areas described under section 5 of the 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
- transportation

The AIWG was consulted on progress made for each of the ACA priority areas. No new barriers were identified in 2024 across all priorities.

5.1 Employment

No short-term actions to remove barriers were identified for this priority in our 2023-2026 Accessibility Plan. Progress was made in 2024 toward medium-term actions:

- In 2024, OSFI onboarded to the Learning Management System Brightspace. OSFI's corporate training and Supervision Institute training are housed in the D2L Brightspace learning platform. The platform conforms to the Web Content

Accessibility Guidelines (WCAG) 2.2 Level AAA standards. This tool provides a high standard of accessibility that supports assistive devices.

- In 2024, OSFI's Labour Relations team responded to over 150 requests for accommodations. As Labour Relations assisted with requests, the team explained the workplace accommodations process to People Leaders and managers involved in supporting an employee. In 2025, we will share the steps for requesting an accommodation with all employees and publish this information on our intranet.
- In July 2024, OSFI's framework for reviewing and approving exceptions to OSFI's hybrid work model was updated to streamline requests for accommodations. We removed the step for committee review and encouraged employees requiring an accommodation to submit requests through our work arrangement application or to contact our Labour Relations team.
- OSFI celebrated AccessAbility Week 2024 with an AccessAbility learning event that gave employees an opportunity to learn more about accessibility barriers in our workplace. Our Accessibility Sponsor shared a message with all employees to promote our Accessibility Survey. The IN Mental Health and Accessibility stream invited staff to participate in a quiz on accessibility and its barriers. The Diversity, Equity, and Inclusion team shared a blog that highlighted an employee's lived experience and how they use the Government of Canada's **Digital Accessibility Toolkit** (<https://a11y.canada.ca/en/>). OSFI plans to celebrate AccessAbility Week every year as part of ongoing efforts to build a culture of accessibility.
- OSFI's Digital Edge team incorporated tips and best practices to increase accessibility in its Digital Booster article series published on OSFI's intranet, and during learning sessions in 2023-2024. This initiative has helped foster a culture of growth, inclusion, and continuous learning.
- Human Resources (HR) updated its mandatory new employee orientation with information on accessibility and invited employees to join our Equity, Diversity, Inclusion, and Accessibility MS Teams channel. HR also created a new intranet topic page on Accessibility as an information and learning resource for staff, which

includes our commitments, ways for employees to take action, and various resources and tools.

- HR started using the Biases and Barriers checklist to support managers during the staffing process. Our staffing advisors worked with hiring managers to identify potential biases and barriers and ways to mitigate them. To support candidates who identify as persons with disabilities, we provide opportunities throughout the staffing process to request an accommodation. If a candidate makes us aware of an accessibility barrier related to assessment, we provide options such as in-person, by audio only, by audio and video, pre-recorded if available, and varied assessment duration.
- Communications, Engagement, and Stakeholder Affairs (CESA) and HR led various outreach and internal engagement activities to raise awareness of our Accessibility Plan and barriers in our workplace.

No new barriers were identified in 2024.

5.2 The built environment

Progress in 2024 to support short-term actions to remove barriers

- OSFI's Facilities team continues to work with HR to support accommodations for employees who require assigned seating. As internal partners in the accommodations process, the OSFI Facilities team learned that some individuals experience light-sensitivity due to overhead office lighting. In October 2024, the Facilities team created a work area at its Ottawa office that has all lights turned off, except emergency lighting. This test pilot includes 14 desks equipped with tri-lamps that give the employee control over their lighting. Facilities will ask participants for feedback in early 2025. If this pilot is successful, Facilities will create areas for light-sensitivity in its Montreal, Vancouver and Toronto offices.
- The Facilities team has participated in ongoing discussions with the IN Mental Health and Accessibility stream to share accessibility barriers related to the built environment.

- Facilities repaired all automatic door openers, and they are fully operational in all offices.

Progress in 2024 toward medium-term actions to remove barriers

- Facilities created a wellness room in its Ottawa office in collaboration with the IN Mental Health and Accessibility stream. Facilities also posted a QR code in the room requesting feedback employees who use it. In 2025, the Facilities team is planning to create wellness rooms at our Toronto and Montreal offices.
- The Facilities team continued to provide ergonomic assessments upon request. In 2025, the team will update OSFI's intranet with information on the availability of ergonomic assessments. As of 2019, medical notes were not required to obtain an ergonomic assessment.
- The facilities team began exploring options to provide employees with faster access to their individual ergonomic assessments. Facilities expects to implement a self-serve option for employees to readily access their assessments.
- As key partners in the accommodation process, Facilities and Information Management/Information Technology (IM/IT) established leads in their respective groups to assist with accommodations requests.
- OSFI reviewed its evacuation procedures in 2023 to align with our hybrid work environment. We shared the new procedures with all employees and contractors in the fall of 2023 and launched training that employees are required to renew every year. The training includes messages on how to stay safe in a low occupancy hybrid work environment. The changes benefitted from consultations with the property owners of our office locations in Vancouver, Montreal, Toronto and Ottawa, the Ottawa fire department, and the federal government's Security Centre of Excellence. In the 2024-25 fiscal year, we will engage the AIWG to obtain feedback on the procedures to ensure that we account for the needs of persons with disabilities.

No long-term actions were identified for this priority in our 2023-2026 Accessibility Plan and no new barriers were identified in 2024.

5.3 Information and communications technologies (ICT)

Progress in 2024 to support short-term actions to remove barriers

- OSFI's IM/IT team prepared a list of hardware, software, and training options that support employees with disabilities. This list was created to inform employees of the types of solutions that are available to them to address specific accessibility needs. IM/IT shared a list of supports on OSFI's intranet newsfeed in November 2024.

Progress in 2024 to support long-term actions to remove barriers

- OSFI's IM/IT team drafted a high-level Technology Accessibility Strategy. IM/IT presented the draft Strategy to OSFI's Digital Council in May 2024 for feedback. In 2025, IM/IT plans to present it to the AIWG for feedback.

One medium-term action was identified for this priority in our 2023-2026 Accessibility Plan. IM/IT's action is to review all ICT processes to establish where accessibility barriers may exist and how the barriers can be eliminated. In 2025, the IM/IT team will consult with the AIWG to determine a path forward on this action.

No new barriers were identified in 2024.

5.4 Communications other than ICT

Progress in 2024 to support short-term actions to remove barriers

- The Communications, Engagement and Stakeholder Affairs division (CESA) developed the OSFI Style Guide to help standardize OSFI's writing style and style conventions across all communications products, with the goal of making content accessible, clear, concise, and inclusive. The Style Guide will be published on OSFI's intranet in January 2025.

Progress in 2024 toward medium-term actions to remove barriers

- CESA created the External Web Working Group in May 2024. This standing working group convenes monthly to discuss trends and best practices related to OSFI's external web site, changing user needs, and upcoming web projects that span multiple sectors. The working group has representation from most OSFI sectors, with smaller sectors opting to send representatives on an ad-hoc basis when required. The membership includes the Corporate Services Division, Office of the Chief Actuary (OCA), Supervision Sector, Regulatory Response Sector, and the Strategy, Risk and Governance Sector.
- In 2024, the Web Renewal Team engaged OCA periodically to teach accessibility practices to improve the accessibility and readability of current and future OCA reports. These were targeted engagements with subject matter experts, with the goal of proactively assessing and addressing the accessibility of reports before they were posted online. The outcome of the engagements was accessible content ready to publish online, and practical skills-based training at the sector level on how to create accessible documents by default. The Web Renewal Team and the OCA are working together to create a guide to train employees more broadly on common OCA report accessibility topics.
- A representative for the Web Renewal team presented plain language writing best practices for the web to the Policy Development and Standards Division (Regulatory Response sector) at the request of a Managing Director. Our Public Affairs team also led three additional plain language workshops that were open to all staff.
- In addition to CESA's outreach and training efforts, subject matter experts also collaborated with communications advisors to obtain advice and guidance on how to make internal and external facing communication products accessible, including web content, speeches and documentation, and graphics and charts.
- Internal communications messages and supporting products such as intranet content, posters, and videos were reviewed and developed for accessibility, plain language, and readability. CESA continues to collaborate with internal partners in the planning and implementation of strategic initiatives to ensure products and information that are shared with employees are accessible.

No new barriers were identified in 2024.

5.5 The procurement of goods, services, and facilities

Progress made in 2024 to support short-term actions to remove barriers

- In 2024, the Procurement and Contracting team's focus was on training procurement officers to ensure clients identified accessibility requirements. The team recognized that building core competencies in accessibility first would in turn help ensure that OSFI's procurement of goods meet accessibility standards.
- The priority lead is a member of the federal Government's interdepartmental group of Agents of Change for Accessible Procurement. Being a part of this community helps contribute to the learning and development of the procurement and contracting team as they leverage knowledge, expertise, and best practices from this working group.
- The Procurement and Contracting team added content to its Procurement Fundamentals training session, which was delivered to two internal client groups in 2024 and will be offered more broadly to other clients in 2025.
- The Procurement and Contracting team acknowledges that there is further work required to evaluate procurement forms for accessibility and address any accessibility gaps in the forms. In 2025, the team will identify the three most frequently used forms for incoming procurement requests and will use the built-in accessibility checker in Microsoft products to identify areas for improvement. The team will also consult with and seek feedback from OSFI's IN Mental Health and Accessibility stream on the accessibility of the forms and make further accessibility improvements as needed. A significant challenge with the forms used in procurement is the need for digital signatures on the documents. To better understand how to address this barrier, the Procurement and Contracting team will consult with OSFI's IM/IT team and the AIWG for advice.

- In 2025 the Procurement and Contracting team will also review its statement of work and evaluation criteria templates (two most frequently used resources for competitive service requirements), using the built-in accessibility checker with Microsoft products to identify areas for improvement. Once changes have been implemented, the team will seek feedback from OSFI's Mental Health and Accessibility team.

No new barriers were identified in 2024.

5.6 The design and delivery of programs and services

No short-term actions to remove barriers were identified for this priority, but progress was made in 2024 toward medium-term actions:

- OSFI continued collaboration with our service delivery teams and the IN Mental Health and Accessibility stream. This collaboration has allowed us to share knowledge of accessibility best practices and learn about accessibility barriers in our workplace.
- In 2025, an Accessibility Strategy will be drafted for initial consultation with our senior leaders and the AIWG. It will demonstrate our commitment to creating an environment that is inclusive for everyone, and that values and enables persons with disabilities. It will also emphasize our commitment to inclusive services, programs, practices, and policies. This Strategy will reinforce our collective efforts to build a culture of accessibility.

5.7 Transportation

Our Accessibility Plan 2023-26 did not originally identify transportation barriers. We updated our Accessibility Progress Report in 2023 with the following new barrier to be analyzed medium-term:

- OSFI will perform a specific review of transportation barriers that may exist in OSFI's policies, including parking and travel policies. We will be engaging employees to provide feedback on where these barriers lie and if/how we can address them.

In 2024, we included questions related the transportation in our first Annual Accessibility Survey. In 2025, we will analyze the results to assess OSFI's accessibility from a transportation perspective, if OSFI employees are facing barriers, and if the organization needs to address barriers that are within OSFI's authority and control.

No new barriers were identified in 2024.

6. Reporting and implementation

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

The *Accessible Canada Act* mandates that annual progress reports be published to track progress on the implementation of the actions described in OSFI's Accessibility Plan. OSFI is excited to continue to implement these actions.

OSFI continues to build accountability and engagement in the implementation of our Accessibility Plan through its Accessibility Implementation Working Group, sponsored by a senior executive. This working group is responsible for our accessibility commitments and for leading progress against actions in our Plan. It is also responsible for reporting on OSFI's progress through our formal governance structure.

In consultation with persons with disabilities, we will continue to proactively identify barriers to accessibility within our organization and strive to eliminate them. We remain committed to addressing these barriers and creating an organization that is inclusive of all.

7. Feedback

OSFI welcomes feedback on accessibility, especially from persons with disabilities. We have established the following process for receiving and actioning feedback related to accessibility. Feedback related to barriers to accessibility at OSFI or the implementation of OSFI's Accessibility Plan can be directed to:

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

Mail:

Diversity, Equity, and Inclusion Advisor
255 Albert Street, 12th Floor
Ottawa, ON K1A 0H2
Canada

Telephone number: 1-800-385-8647

TTY: 1-800-465-7735

Fax: 613-990-5591

Feedback can be submitted anonymously or with personal information identified.

All feedback will be acknowledged through the same means by which it was received, unless it was received anonymously.

If the feedback was not submitted anonymously, it will be acknowledged through the same means it was received within 15 business days.

The feedback will be taken into consideration by the Diversity, Equity, and Inclusion team. It will then be forwarded to relevant divisions when necessary.

If the feedback included contact information, any immediate action resulting from the feedback will be communicated to the person who submitted the feedback. All feedback related to accessibility will be captured in a central location for analysis and recordkeeping. Feedback will be used to help identify, prevent, and remove barriers in a timely manner.

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

Date modified:

2024-12-19