



# Review of Readiness to Implement the Accessible Canada Act



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# 1. Introduction

Vision of the *Accessible Canada Act*: to proactively eliminate and prevent barriers and ensure greater opportunities for persons with disabilities ([Accessible Canada Act Infographic](#))

## 1.1 Background

1. Persons with disabilities do not have the opportunity to participate fully and equally in Canadian society. The 2017 Canadian Survey on Disability found that 59% of persons with disabilities aged 25 to 64 were employed, compared with 80% of the rest of that age group. The survey also found that persons with disabilities earned less and were more likely to live in poverty. Persons with disabilities are disadvantaged by various barriers when applying for positions or promotions.

**Disability: Any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment, or a functional limitation, whether permanent, temporary or episodic in nature, evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society. (Source: Accessible Canada Act)**

2. To address this situation and build a more accessible Canada, Parliament passed the *Accessible Canada Act* (the Act) on June 21, 2019. The Act is intended to make Canada barrier-free by January 1, 2040. It reinforces the obligations to persons with disabilities under the [Employment Equity Act](#), which include removing barriers so that "no person shall be denied employment opportunities or benefits for reasons unrelated to ability." What sets the Act apart, however, is the new obligations it contains, including the following:

- a) to proactively remove barriers in employment, the built environment, information technology, communication, procurement of goods and services, design and delivery of programs and services, and transportation
- b) to prevent new barriers in the areas where the Act applies
- c) to prepare action plans and progress reports on efforts to remove barriers by a date to be determined by June 2021
- d) to consult persons with disabilities in developing policies and initiatives
- e) to initiate a feedback and reporting process that addresses barriers faced by persons with disabilities by a date to be determined by June 2021

**Barrier:** Anything physical, architectural, technological or attitudinal, or based on information or communications, or that is the result of a policy or a practice, that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation. (Source: Accessible Canada Act)

3. The Act applies specifically to 3 sectors: Parliament; the Government of Canada, including the Public Service Commission of Canada (PSC); and the federally regulated private sector, including financial institutions and transportation and telecommunications companies. The Act establishes a new framework to promote barrier removal, including the establishment of the Chief Accessibility Officer position to advise the minister responsible for accessibility and to report on the results achieved under the Act. New standards are also expected in the coming years. Established under the Act in 2019, Accessibility Standards Canada is working to finalize the first wave of next-generation standards that will apply to organizations subject to the Act by 2022.

4. Another major change effected by the Act is the new definition of the term “disability.” The *Employment Equity Act* defines a person with a disability as a person with a long-term or recurring impairment. The Act includes conditions that are temporary and episodic in nature that hinder a person’s full and equal participation. This new definition also focuses on the condition rather than the person and recognizes temporary disabilities. As a result, regulated entities have to review what may constitute a barrier in the workplace.

**Disability:** Any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment, or a functional limitation, whether permanent, temporary or episodic in nature, evident or not, that, in interaction with a barrier, hinders a person’s full and equal participation in society. (Accessible Canada Act)

**Persons with disabilities:** People with a long-term or recurring physical, mental, sensory, psychiatric or learning impairment and who either:

- a) consider themselves to be disadvantaged in employment because of that impairment
- b) believe that an employer or potential employer could consider them to be disadvantaged in employment because of that impairment (Employment Equity Act)

5. While many components of the Act remain to be defined, federal departments and agencies should already be working on removing barriers. They also have to meet the accessibility requirements previously set out in Treasury Board of Canada Secretariat (TBS) policies and instruments, particularly with respect to the built environment, information technology and employment. In addition, in May 2019, following consultations with public service employees across Canada, TBS launched the [Accessibility Strategy for the Public Service of Canada](#) (the Strategy), which aims to make Canada's public service the most accessible and inclusive in the world. It has 5 objectives:

- improving the recruitment, retention and promotion of persons with disabilities
- enhancing the accessibility of the built environment
- making information and communications technology usable by all
- equipping public servants to design and deliver accessible programs and services
- building a public service that is confidently accessible

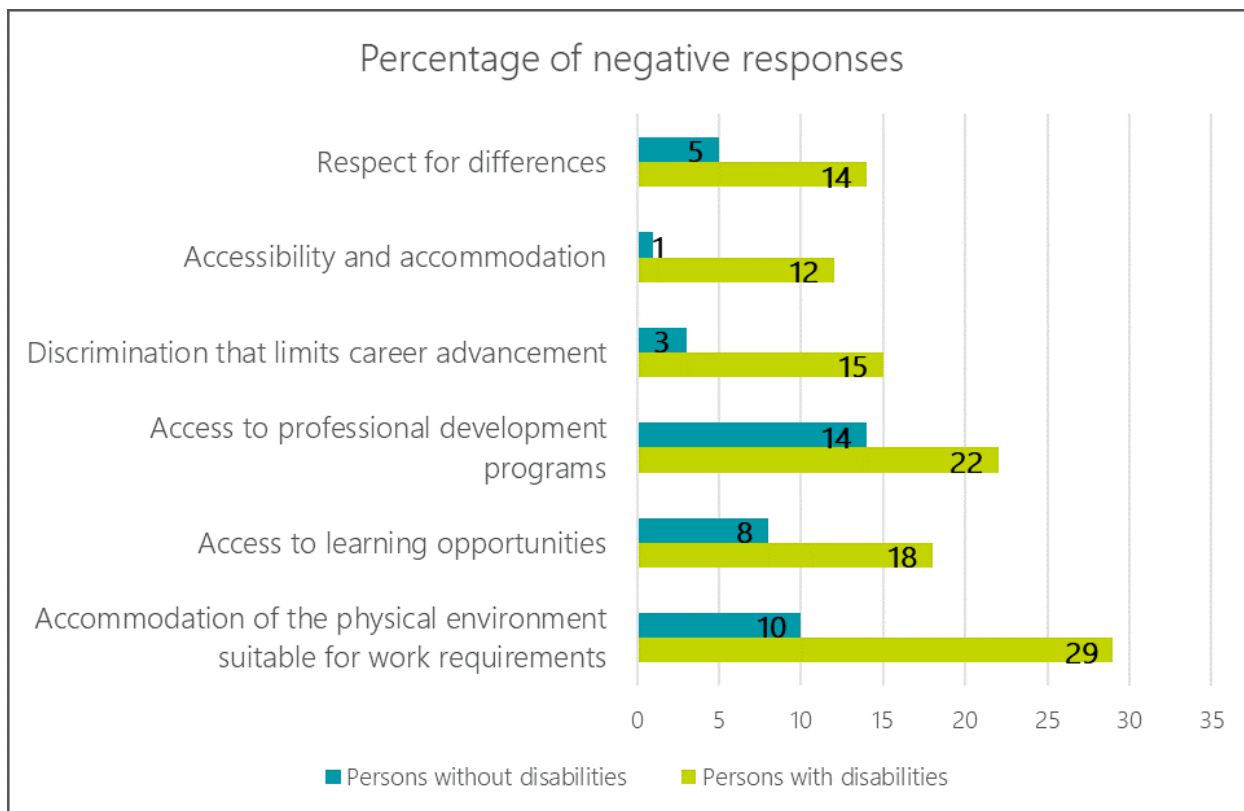
6. TBS hopes this will bring about a cultural change that will make Canada's public service accessible by default. To do this, the Strategy leverages the active participation of persons with disabilities in designing and implementing solutions, as indicated by one of its guiding principles: "Nothing without us."

7. As the central agency responsible for promoting an inclusive public service that is representative of Canadians, it is important for the PSC to set an example in the area of accessibility. For years, the PSC has worked and helped to reduce barriers to employment. Initiatives include the hiring of 5 000 public servants with disabilities by 2025, the Federal Internship Program for Canadians with Disabilities, implementation of the *Veterans Hiring Act* and the Employment Opportunities for Students with Disabilities program. The President of the PSC emphasized in the 2020–21 Departmental Plan that the PSC must continue to build on its success and hire more persons with disabilities into the public service to promote a workforce of the future that reflects Canada's diversity. These initiatives are already evident in the PSC's own workforce.

8. Recent PSC indicators show some gaps in the integration of persons with disabilities. According to the report entitled "Employment Equity in the Public Service of Canada for Fiscal Year 2018 to 2019," the PSC had 55 employees with disabilities, comprising 6.9% of its workforce, compared with 5.2% for the core public administration. These percentages are well below the 9% available in the labour force. As well, several issues arising from the 2019 Public Service Employee Survey provide the PSC with

opportunities for improvement and suggest that the agency should continue its internal efforts to become a leader in accessibility.

**Figure 1: 2019 Public Service Employee Survey – PSC results**



### Text version

#### Percentage of negative responses

Comparison of the percentages of negative responses to certain questions in the 2019 Public Service Employee Survey between persons with disabilities and persons without disabilities.

- 5% of persons without disabilities responded negatively to the question on respecting differences, compared to 14% of persons with disabilities
- 1% of persons without disabilities responded negatively to the question about accessibility and adaptation, compared to 12% of persons with disabilities
- 3% of persons without disabilities reported discrimination that limited career advancement, compared to 15% of persons with disabilities

- 14% of persons without disabilities responded negatively to the question about access to professional development programs, compared to 22% of persons with disabilities
- 8% of persons without disabilities responded negatively to the question about access to learning opportunities, compared to 18% of persons with disabilities
- 10% of persons without disabilities responded negatively to the question about accommodation of the physical environment suitable for work requirements, compared to 29% of persons with disabilities

9. Over the past 18 months, the PSC has undertaken a series of initiatives to implement the Act and the Strategy, providing a more accessible workplace for its employees. Senior management is giving priority to diversity and inclusion, including persons with disabilities. Various measures have been taken to promote the hiring and retention of persons with disabilities, including through the Federal Internship Program for Canadians with Disabilities. However, the success of these initiatives depends on stakeholders' ability to identify and remove barriers to accessibility. At the same time, the PSC needs to be able to provide accommodation measures that address disparities. In addition, the COVID-19 pandemic and the requirement to work remotely since March 2020 may give rise to new obstacles to the PSC's efforts to create a more inclusive workplace.

## 1.2 Objective

10. This review was prepared at the request of the Vice-President, Corporate Affairs, and the Human Resources Management Directorate to support them in implementing the PSC's diversity and inclusion objectives. The purpose of the review was to assess the PSC's readiness to implement the Act. The review focused on initiatives to hire persons with disabilities and efforts to ensure an accessible workplace. The aim was to determine what is working well now and to identify areas for improvement that the PSC should focus on in the coming years. In particular, the review looked at the following:

- a) actions taken to improve the hiring, retention and promotion of persons with disabilities
- b) actions taken to identify and remove workplace barriers to ensure the full and equal participation of all employees
- c) PSC governance regarding the implementation of the Act

## 1.3 Scope

11. The review covered PSC activities to implement the Act, particularly for the period from April 2018 to December 2020. The review dealt with the parts of the Act applicable to the PSC, including the following:

- **employment:** initiatives to identify and remove barriers to employment, thereby contributing to the government's objective of hiring 5 000 persons with disabilities by 2025
- **the built environment:** access to a barrier-free built environment for employees
- **information and communications technology:** access to information and communications technology for PSC employees, regardless of ability, to ensure full and equal participation
- **design and delivery of programs and services:** designing programs and services to ensure the same level of service for everyone, regardless of their condition
- **procurement of goods and services:** the type of controls deployed to ensure the procurement of accessible goods and services<sup>1</sup>

12. The review also looked at TBS expectations related to the areas covered by the Act, as outlined in the instruments and the Strategy. However, the review was not intended to assess the PSC's compliance with the Strategy and other requirements in TBS instruments.

13. The review did not cover services provided by the PSC as a central agency, such as second language evaluation, public-service-wide recruitment programs and monitoring activities. Other topics, such as respect for differences and discrimination, were also excluded because they did not fall directly within the scope of the Act.

## 1.4 Review criteria and methodology

14. The criteria used for this review are drawn from the requirements of the Act and current TBS policies. The methods used in the review are presented in Appendix C of this report.

15. The review team also assembled an advisory committee of 6 persons with disabilities from the PSC, recruited through a call for interest in *Update at the PSC*. All those interested were able to take part. Participants were invited to comment on the review's action plan, the survey and the report's findings. The process involved email

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<sup>1</sup> Transportation is not included, as it does not affect the PSC's mission and functions.

correspondence, private conversations and group discussions, depending on the participants' preferences.

## 1.5 Statement of conformance

16. The review was carried out in accordance with the PSC's 2020–23 Internal Audit and Evaluation Plan. In our professional judgment, sufficient and appropriate review procedures were applied and appropriate evidence was gathered to support the accuracy of the findings in this report. The findings were based on observations and analyses at the time of our review. The evidence was gathered in accordance with the TBS Policy on Internal Audit and the International Standards for the Professional Practice of Internal Auditing of the Institute of Internal Auditors.

## 2. Review findings

[The President of the Treasury Board](#) said the following about the Strategy:

“The Government of Canada is committed to being an accessible employer and service provider .... The goal of this strategy is to ensure we have a public service where everyone can contribute and succeed to their full potential.”

### 2.1 Recruitment of persons with disabilities

17. The goal of the Act is to facilitate “the economic, social and civic participation of all persons in Canada, regardless of their disabilities.” This commitment is reinforced by the Strategy, which aspires to make the Government of Canada an employer of choice that can offer positions that allow persons with disabilities to achieve their full potential. As a result, the public service has set a hiring target of 5 000 persons with disabilities by 2025 to increase their representation.

18. The review team examined the PSC’s efforts to hire persons with disabilities into its workforce.

19. **Criterion:** The PSC has implemented procedures, practices and resources to improve the recruitment, retention and promotion of persons with disabilities. Managers have the knowledge and skills to implement accessibility measures upon hiring.

### Hiring

20. First, there is no reliable mechanism for counting the number of persons with disabilities in the public service, as defined in the Act. The definition used by most existing mechanisms refers to the definition of “persons with disabilities” in the *Employment Equity Act*. The Act expands the definition of “disability” to include “temporary or episodic” conditions. This new definition will lead to disparities in the interpretation of future data.

21. In addition, self-identification data is submitted voluntarily by applicants or employees who self-identify during the hiring process or complete the self-identification form in MyGCHR. Many employees with disabilities have not identified themselves as such in recent years. The review team surveyed the PSC’s 897 employees to find out more about their knowledge of accessibility and their situation. The survey asked them about their situation. Of the 338 respondents, 78 said they had had a disability in the past 2 years as defined by the Act, while only 43 said they had self-identified.<sup>2</sup> At the

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<sup>2</sup> Three respondents could not remember whether they had self-identified.

end of the survey, 52 respondents self-identified as having a disability in accordance with employment equity groups. This means that a significant number of employees had a disability but did not self-identify. To address this situation, the Human Resources Management Directorate decided to develop various communication products to inform employees of the value and purpose of self-identification in an appointment process.

22. The PSC set a target of 9% representation of persons with disabilities in the workforce by 2025. In March 2019, official data showed that there were 55 employees with disabilities, which is 6.9% of the workforce.<sup>3</sup> Other surveys, including the 2019 Public Service Employee Survey and the “Have Your Say” internal survey, had a higher representation rate, 10.8% and 11.0% respectively. However, the Human Resources Management Directorate was given a clear mandate to put in place measures to recruit more persons with disabilities so that the PSC can become a leader in this area.

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<sup>3</sup> The Office of the Chief Human Resources Officer collects workforce information in March and provides official data to each department and agency in October. At the time of writing, the PSC was still waiting for March 2020 data to assess its representation progress.

Figure 2 Number of persons with disabilities at the PSC

-	Total number of responses	Number of persons with disabilities
2019 Have Your Say	324	38 (11.0%)
2019 Public Service Employee Survey	688	74 (10.8%)
2020–23 People Management Strategy	797*	55 (6.9%) **

\* 2018–19 actual full-time equivalent

\*\* Data provided by the Office of the Chief Human Resources Officer as of March 31, 2019

23. The review team examined the PSC's efforts to recruit persons with disabilities. Over the past 2 years, the PSC recruited 4 people through the Federal Internship Program for Canadians with Disabilities. In the summer of 2020, senior management set a goal of hiring 25 more persons with disabilities by 2025. To this end, each sector identified vacancies that could be filled by persons with disabilities, an initiative that was still ongoing at the time of writing. The Human Resources Management Directorate will continue to work with the sectors to find ways to recruit people from outside the public service to staff those positions. It has also planned a variety of activities to support the hiring of persons with disabilities by the PSC, including the following:

- providing information to human resources advisors on the requirements of the Act and the Strategy, so that they can provide advice on accessible and barrier-free hiring practices
- participating in promoting and delivering targeted programs and services to recruit talented and diverse candidates to meet hiring needs
- creating pools of candidates that meet specific needs, which would focus on persons with disabilities to achieve accessibility goals

24. However, some stakeholders expressed concern about the PSC's ability to meet the hiring targets if it had to downsize or restrict external recruitment.

25. Successful recruitment is highly dependent on hiring managers and supervisors. The review team surveyed them to determine whether they felt they had a good understanding of their roles and responsibilities regarding accommodation measures for assessing persons with disabilities in the hiring process, and whether they felt they had the knowledge to carry them out.

26. Forty-four percent of managers and supervisors stated that, to a large extent, they had a good understanding of their roles and responsibilities regarding accommodation measures in a hiring process, while 49% felt they had some understanding. Almost 7% said they had little understanding, and none said they had no understanding at all. In terms of knowledge, 29% of managers felt they had a good knowledge of how to manage assessment accommodation requests in a hiring process, while 47% said they had some knowledge. A significant proportion, 24%, felt they had little or no knowledge. Among the issues raised, managers mentioned the wide variety of disabilities and accommodation measures about which they have little knowledge, and uncertainty about the Act's impact on their obligations. It was also brought to our attention that these factors may be due to the unconscious biases of some managers and the perception that bringing in persons with disabilities would require a lot of effort.

27. The Human Resources Management Directorate has various ways of providing managers with information about good practices for hiring persons with disabilities and of gathering information on their needs. The Staffing Compass, launched in 2018, contains links to documents that highlight organizational diversity and inclusion goals. It also includes a function that allows managers to submit comments on staffing issues. Training was offered in 2019 on unconscious biases in the staffing process. Templates for letters of offer have been revised to include information on accommodation measures. In addition, the Human Resources Management Directorate holds consultations with the PSC's other directorates every year to identify people management needs; the consultations provide an opportunity for sectors to discuss their recruitment challenges.

28. In summary, the Human Resources Management Directorate provides the PSC with significant support to meet its hiring goals. However, the survey conducted for this review shows that many managers need more support, or that the message is not universally understood. In pursuing these efforts, the Human Resources Management Directorate might take guidance from the Strategy, which suggests that human resources processes be reviewed in consultation with persons with disabilities, to make them more inclusive. The Human Resources Management Directorate might also



consider creating mechanisms for monitoring the careers of persons with disabilities within the PSC to ensure that they have equal access to opportunities for promotion.

29. **Finding:** The Human Resources Management Directorate is working to update procedures and practices to support the recruitment, retention and promotion of persons with disabilities. It has also planned its activities and resources to meet its recruitment targets by 2025 and stay on schedule. However, it will need to continue providing managers with the tools they need to feel more comfortable with hiring persons with disabilities.

## Integration

30. **Criterion:** Managers have the knowledge and skills to implement workplace accommodation measures.

31. After persons with disabilities are hired, it is important to be able to integrate them so that they can thrive in the workplace. This responsibility rests largely on managers' know-how and, above all, their interpersonal skills. In the survey conducted for the review, 17% of respondents (18 people) indicated that they felt well-equipped to integrate persons with disabilities into their team, while 54% (57 respondents) felt somewhat equipped. About 26% (28 respondents) felt that they were poorly equipped, and 3% (3 respondents) that they were unequipped. Among the comments received, some managers stated that they did not consider integrating persons with disabilities more difficult than integrating employees without disabilities. Others indicated that their comfort level depended on the nature of the disability. In view of the wide variety of disabilities, it is sometimes difficult to know what to do in each situation that arises. About one third of managers requested more resources to support them in this area. Respondents also suggested training on the subject or providing a procedures manual or a list of contacts to support them.

32. This resembles the situation in government. The December 2020 progress report on the implementation of the Strategy notes that many managers of people hired through the Federal Internship Program for Canadians with Disabilities do not feel prepared or equipped to recruit persons with disabilities, and that many human resources professionals do not have the confidence to provide advice in this area. TBS plans to provide managers with support in the form of new learning activities and a series of videos. The PSC may leverage these government initiatives to continue to equip its managers.

33. The survey showed that most persons with disabilities felt supported by the organization and their managers, whether in getting help to obtain the tools they needed to do their jobs or to remove barriers. Over 70% of respondents affected by these issues indicated that they received some or a lot of support. However, in analyzing the comments, the review team noted that experiences varied widely, from very good support to little or no support. Some people said they saw improvements when there was a change of managers. Others noted that the problems were not related to management support but rather to issues such as the time required to obtain materials and the cumbersome administrative process for accommodation.

### **Accommodation measures**

34. While the ultimate goal of the Act is to create a barrier-free workplace, it is often necessary to provide reasonable accommodation so that all applicants can participate in hiring processes in an equitable manner. As an employer, the PSC has a legal obligation to right wrongs and make amends by implementing special measures and accommodation in accordance with the *Employment Equity Act*.

35. Over the past few years, the PSC has been working to improve its process for managing accommodation requests. In 2018, the internal audit team held consultations on accessibility-related accommodation. The report concluded that the PSC did respond to accommodation requests, but that some of the more complex requests took longer. The report highlighted the following improvements for the future:

- developing service standards and timelines for all types of accommodation requests, from simple to complex
- requiring managers to notify the Workplace Management Division of accommodation requests so that the information can be centrally recorded and managed
- collecting information needed to track and report on accommodation measures, such as timeliness, expenditures or anticipated equipment acquisition
- implementing a procedure for following up with employees and managers on the effectiveness of the accommodation measures

36. Since then, the Workplace Management Division (the Division) has been reviewing its guidelines on the duty to accommodate in the workplace, in part to streamline the process. The work is not yet complete. In response to the COVID-19 pandemic, the Division re-evaluated certain procedures for supporting employees working remotely. As a result, some of the issues raised during the consultations are still relevant today.

For example, the Division is not automatically consulted or informed when managers implement accommodation measures, despite the requirement in the Duty to Accommodate Guidelines.

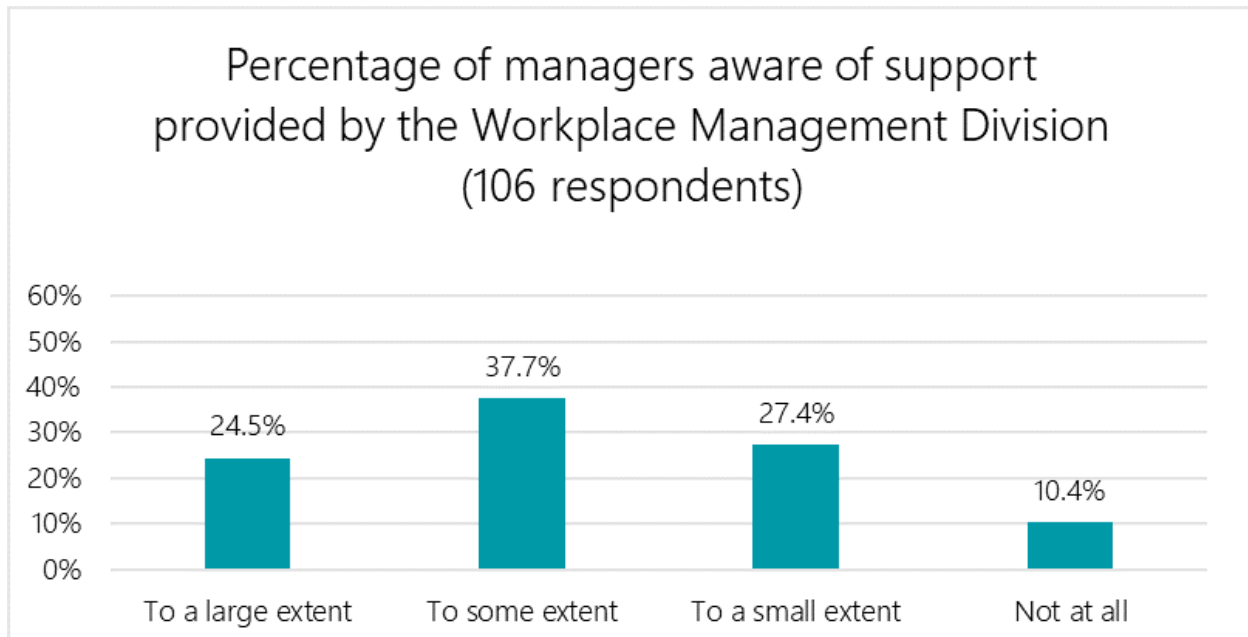
37. The review team surveyed PSC managers and supervisors to find out whether they felt they had a good understanding of their duties in relation to accommodation requests, and whether they felt they had sufficient knowledge to carry out their duties properly. Forty-three percent of managers and supervisors reported that they had a good understanding of their roles and responsibilities regarding workplace accommodation for employees with disabilities, while 44% felt they had some understanding. About 11% said they had a little understanding, while only one person reported having no understanding at all.

38. With respect to the knowledge required to manage workplace accommodation requests, 22% of managers felt they had a good knowledge, while 50% responded that they had some knowledge. A significant proportion, 28%, felt they had little or no knowledge. These results suggest that there is room for improvement to ensure that managers and supervisors can properly guide employees and provide them with the accommodation measures they are entitled to.

39. The first step in supporting managers and supervisors would be to provide more information about what the Workplace Management Division does. The Division is responsible for providing advice and guidance on the duty to accommodate, including ergonomic assessments and the acquisition of various essentials such as equipment, adaptive technology and other work tools to make the workplace accessible. Approximately 38% of managers and supervisors said they had little or no knowledge of what the Division does.



**Figure 3 Percentage of managers aware of support provided by the Workplace Management Division**



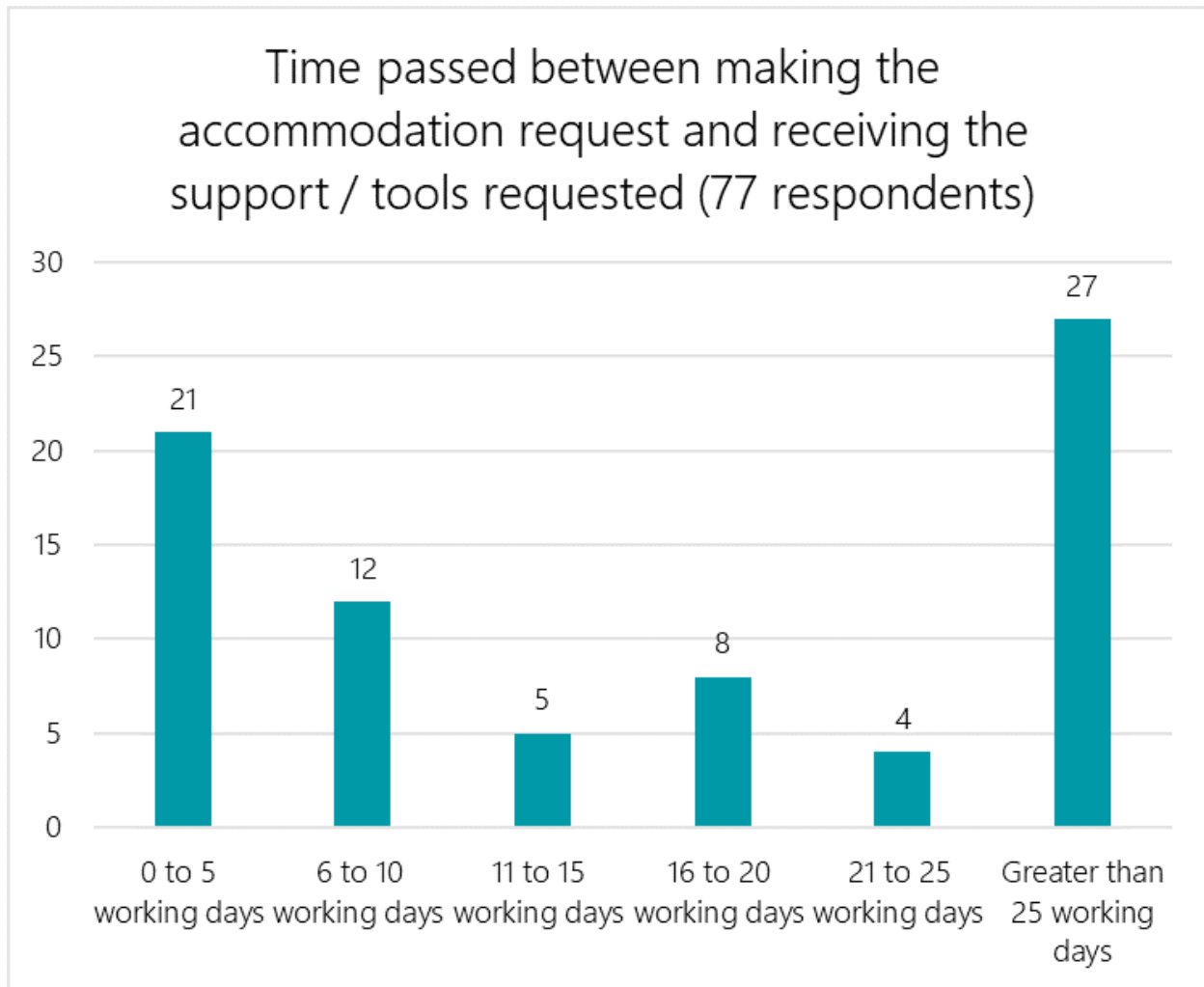
#### **Text version**

Percentage of managers aware of support provided by the Workplace Management Division

Of a total of 106 respondents, 24.5% answered they were aware to a large extent, 37.7% to some extent, 27.4% to a small extent and 10.4% not at all.

40. Some respondents noted that the request process was rather lengthy, which can hinder the integration of persons with disabilities. Of the 338 respondents, 77 indicated that they had submitted at least one request in the previous 2 years. About 55% of the requests were related to a disability.

**Figure 4 Time passed between making the accommodation request and receiving the support / tools requested**



### **Text version**

Time passed between making the accommodation request and receiving the support / tools requested

Of 77 respondents, 21 waited from 0 to 5 working days, 12 waited from 6 to 10 working days, 5 waited from 11 to 15 working days, 8 waited from 16 to 20 working days, 4 waited from 20 to 25 working days, and 27 had to wait more than 25 working days.

41. Overall, 28 requests took more than 25 working days to process; 17 of those requests were from persons with disabilities. The survey did not specify the reason, that is, whether it was due to delays by managers in forwarding requests, delays by the employee in providing supporting documentation, the time that the Workplace

Management Division took to process the request or difficulty in obtaining the necessary tools. The Division told the review team that some managers were still taking far too long to forward employee requests. As well, the telework arrangements that were quickly put in place in March 2020 probably slowed the process down.

42. The review team also found that some employees were uncomfortable asking for accommodation. Approximately 18% of survey respondents said they were uncomfortable doing so. The concerns were slightly more pronounced among those who had had a disability in the past 2 years (27%), compared with 15% of other employees.

**Figure 5 Extent to which employees feel comfortable asking for accommodation in the workplace because of a disability**



### Text version

#### Extent to which employees feel comfortable asking for accommodation in the workplace because of a disability

The results are presented for persons with disabilities and persons without disabilities. 51.1% of persons without disabilities responded that they were comfortable requesting accommodation to a large extent and 33.5% to some extent, while persons with disabilities responded that they were comfortable to a large extent at 44.9% and to

some extent at 28.2%. Persons without disabilities said they were comfortable to a small extent at 10.4%, and not at all comfortable at 5.0%, while persons with a disability said they were at comfortable to a small extent at 21.8%, and not at all comfortable at 5.1%. 338 people answered this question.

43. Some of the comments received from respondents were as follows:

- fear that non-physical disabilities, such as mental illness, would be misperceived or misunderstood by management
- lack of information about potential solutions
- previous difficulties in obtaining accommodation due to such problems as the cumbersome nature of the process
- anxiety about the process

44. This finding is similar to what was observed in the third edition of the “Have Your Say” survey, conducted in 2019. Of the 4 employment equity groups, persons with disabilities disagreed the most with the following statement: “A request for workplace accommodation due to a temporary or permanent functional limitation or for mental health reasons would be well received in my organization.” Nearly 42% of respondents with disabilities disagreed, compared with 15% of all employees.

45. Since accommodation is a shared responsibility, it is important for all employees to understand their rights and responsibilities. Most employees surveyed (77%) were satisfied with the information, training, resources and other tools available to them. Respondents also suggested some examples of additional tools that might be useful to them: training; straightforward, accessible guides; and awareness activities.

46. Overall, most PSC employees are relatively satisfied with the accommodation measures they have received.

**Figure 6 Level of satisfaction of the employer's response to accommodation requests**



### **Text version**

#### **Level of satisfaction of the employer's response to accommodation requests**

Of 77 respondents, 48.1% said they were satisfied to a large extent with the employer's response to accommodation requests, 32.5% said they were satisfied to a certain extent, 14.3% to a small extent and 5.2% were not at all satisfied.

47. Among the negative comments received, some respondents mentioned difficulties and delays as the PSC was making efforts to adjust to telework due to the COVID-19 pandemic.

48. To improve the situation, the Workplace Management Division has developed a training course on the duty to accommodate. The course, which is intended for managers, is expected to be offered in the spring of 2021. In addition, the Division has been working on standardizing the process for requesting accommodation to eliminate any confusion about the procedure. In short, these initiatives should support and empower employees and managers so that they will be better able to manage accommodation requests.

49. **Finding:** The Human Resources Management Directorate has controls in place to ensure that accommodation is properly managed. It can continue to improve accessibility by determining how to reduce the time it takes to process requests and by increasing employee confidence in the process, where they are entitled to it.

50. **Consideration 1:** The Human Resources Management Directorate should continue to improve its controls, in part by introducing a process to regularly gather information about managers' needs for tools and mechanisms to assist them in effectively recruiting and integrating persons with disabilities.

## 2.2 Accessible workplaces

51. To comply with the requirements of the Act, the PSC has an obligation to work toward the removal of barriers in the workplace. A barrier-free workplace also promotes the inclusion and advancement of persons with disabilities in the government.

52. The review team wanted to know whether the PSC was meeting accessibility standards in the areas covered by the Act. It also surveyed employees to find out what barriers they face, and it identified areas where the PSC could improve.

### Built environment

53. **Criterion:** The built environment is barrier-free.

54. The Act requires that barriers be removed from the built environment by 2040. It also states that regulated organizations must work now to remove barriers and prevent new barriers. This requirement is an addition to the existing TBS standards. The Accessibility Standard for Real Property establishes minimum accessibility requirements for the government, including compliance with the standard entitled "Accessible Design for the Built Environment" (CAN/CSA B651-18). Enforcement of these standards is a shared responsibility, with Public Services and Procurement Canada responsible for common-area compliance and the PSC for workspace compliance.

55. In addition, under the Strategy, departments and agencies are required to promptly put in place a series of measures to remove workplace barriers, including the following:

- examining the built environment in consultation with persons with disabilities to determine how to make it more accessible and inclusive
- actively promoting accessibility features and services in workspaces and public areas
- ensuring that events and meetings are accessible to all employees and, where applicable, the public

56. The review team consulted with Facilities to determine what mechanisms were in place to identify barriers. The last inspection was conducted in 2016 by Public Services and Procurement Canada and covered common areas only. As for workspaces, barriers are usually removed in response to requests for accommodation. Occupational Health and Safety conducts monthly inspections of the physical environment. It sometimes reports on accessibility issues when they are brought to its attention, but that is not the primary focus of the inspections.

57. In the survey conducted for the review, of the 78 respondents who had had a disability in the previous 2 years, 34 indicated that they had faced barriers related to the physical environment. Among the barriers mentioned, respondents noted problems related to facilities, such as faulty automatic doors, corridors that were not properly cleared or non-accessible bathrooms in facilities outside the National Capital Region. Most of the physical environment barriers reported in the survey, however, had to do with invisible disabilities; among the most frequently cited were noise (15 respondents), such as loud conversations in the workplace, and light (13 respondents).

58. The results of the survey highlighted the need to continue the dialogue with persons with disabilities to better understand the barriers they face on a daily basis in their work environment. These results are consistent with those of the consultations conducted by TBS before the development of its Strategy, which demonstrated that the existing standards were not always enough to remove physical barriers.

59. Since the advent of telework due to the COVID-19 pandemic, most employees with disabilities have faced fewer barriers than they did in the office. However, many persons with disabilities cannot do their jobs to their full potential. In total, 22 of the 78 persons with disabilities continued to face barriers, particularly related to the provision of ergonomic equipment at home. Other reasons cited include the difficulties caused by videoconferencing, such as the protocol for hearing problems, the long meetings that affect those with concentration problems, and the lack of physical separation between work and private life. However, only 6 of 22 respondents said they faced more barriers at home than in the office.

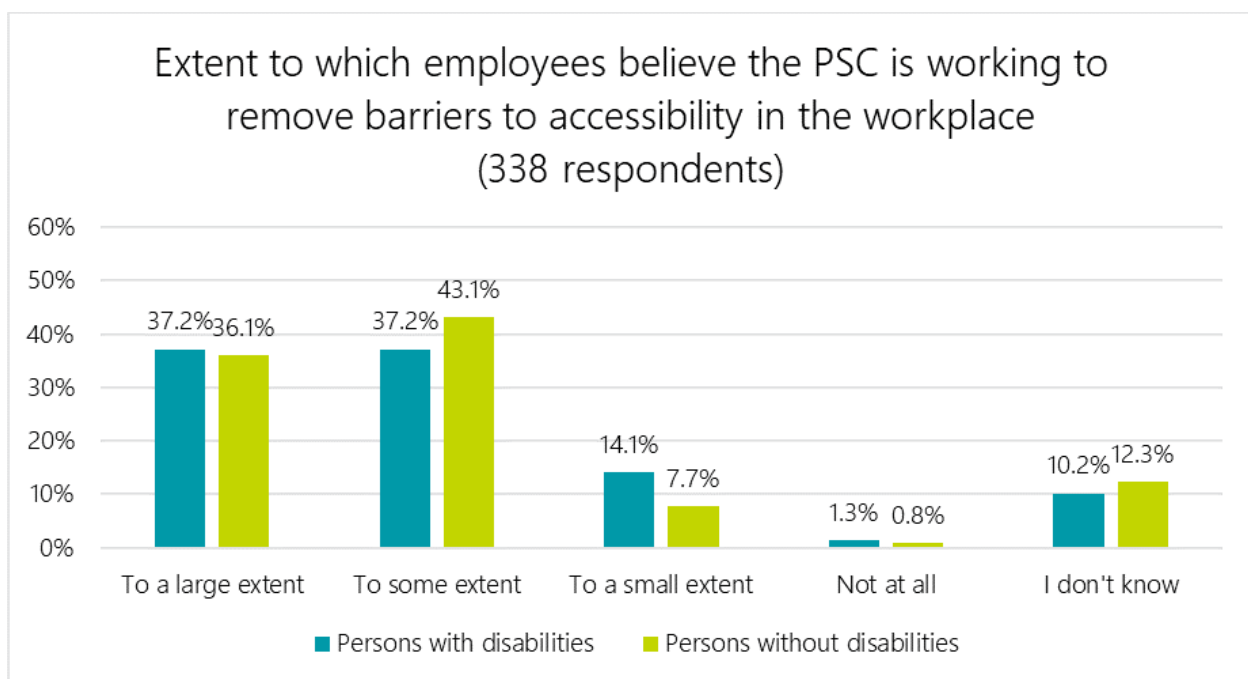
60. In April 2020, the PSC introduced special measures to help employees adapt their workspace at home. Those measures were first presented to managers in April, emailed to employees in June and published in the Update at the PSC in October. Nevertheless, the survey found that some employees had not received the support they needed to do their jobs. The PSC will also need to consider accommodation for employees when they



return to the office. Some employees may require more time to reintegrate into the physical environment.

61. Respondents had a positive perception of most of the PSC's efforts to remove barriers in the workplace. Some 36% of respondents felt that the organization was doing a lot to remove barriers, while 42% said it was making some effort, 9% a small effort and 1% no effort at all. Persons with disabilities had a slightly more negative view of the PSC's efforts.

**Figure 7 Extent to which employees believe the PSC is working towards removing barriers to accessibility in the workplace**



### Text version

#### Extent to which employees believe the PSC is working towards removing barriers to accessibility in the workplace

The results are presented for persons with disabilities and persons without disabilities. Of persons without disabilities, 36.1% responded that the PSC is working towards removing barriers to a large extent and 43.1% to some extent, while for persons with disabilities, 37.2% felt this was happening to a large extent to and another 37.2% to some extent. 7.7% of persons without disabilities responded that the PSC works to remove barriers to a small extent at 0.8% not at all, while 14.1% persons with disabilities felt this was happening to a small extent and 1.3% responded that it was not happening

at all. 10.2% of persons with disabilities answered “I don't know” to the question, while 12.3% of persons without disabilities answered the same.

62. The comments received point to some potential areas for improvement. Some of the issues raised include accessibility of documents and presentations, lack of tools to support different facets of accessibility (writing tools, explanations of rights and responsibilities) and inadequate consultation with persons with disabilities to learn about the barriers they face.

63. **Finding:** There are still a number of barriers in the work environment. Some could be identified by inspections, but most persons with disabilities identified invisible barriers that are not recognized by current built-environment standards.

64. **Consideration 2:** The Human Resources Management Directorate, in collaboration with the Finance and Administration Directorate, should put in place a mechanism to consult employees with disabilities in order to better understand the physical and invisible barriers they face in the workplace. The consultation should support the development of solutions to individual and systemic challenges or barriers with a view to eliminating them.

## Information technology

65. **Criterion:** The PSC provides its employees with technology solutions.

66. Beyond the Act's requirements to remove information technology barriers, the Policy on Service and Digital requires departments and agencies to address accessibility at the solution design stage. In addition, organizations subject to the Act have a duty to accommodate employees in ways that will enable them to do their jobs effectively.

67. Information technology accessibility remains a significant challenge in the Canadian government. During the initial investigation that led to the development of the Strategy, several stakeholders complained about the lack of accessibility in some key tools, such as Phoenix, PeopleSoft and GCdocs. Accessibility features in some applications are either non-existent or disabled. The survey found that persons with disabilities often have difficulty accessing the information technology they need to do the work, even when adaptive technology is involved.

68. The review team found that the Information Technology Services Directorate had developed controls to address the accessibility of technology solutions being added to its architecture at the operational requirements evaluation stage. The Directorate considers the level of risk presented by technological solutions that would not be

accessible and would be intended for a small number of users. A similar mechanism is also in place for approving applications for development. The template used to submit project proposals to the annual prioritization cycle requires the project sponsor to assess the project's impact on PSC employees and on Canadians. The sponsor must also provide evidence that various groups, including persons with disabilities, have been taken into consideration. In addition to these controls, a qualitative assessment is made by an accessibility officer when products are developed or acquired.

69. The review team found that since these controls have not been in place for very long, it was impossible to assess whether they are being applied consistently and whether there is a risk of technological solutions being adopted without consideration of accessibility needs. A person from IT also noted that accessibility would be better served if it were considered at the outset of a project, before it was submitted to Information Technology Services—specifically, when the project sponsor was determining the requirements.

70. In general, the Information Technology Services Directorate provides the technology solutions that employees need to do their jobs. Of the 78 respondents who had had a disability in the previous 2 years, 10 said they had not received all the adaptive IT tools they needed for their work. People who were dissatisfied complained that they were unable to obtain some basic technological tools, such as standard ergonomic equipment, an extra monitor or a laptop for remote work. The Information Technology Services Directorate is not necessarily at fault for the difficulties identified, as the responsibility for procuring adaptive equipment also rests with the managers involved and with the Workplace Management Division.

71. Several Information Technology Services Directorate stakeholders pointed out that acquiring and maintaining knowledge of accessibility was challenging, in view of the small size of the team and the wide range of possible disabilities. The review team found that the Information Technology Services Directorate used the external resources available to it to provide accessible tools to PSC employees (namely Shared Services Canada's Accessibility, Accommodation and Adaptive Computer Technology program).

72. To continue improving its level of accessibility, the Information Technology Services Directorate could take guidance from TBS's recommendation that departments and agencies promptly conduct a review of their systems and software and develop an action plan to address existing deficiencies.

73. **Finding:** The Information Technology Services Directorate has controls in place to support the development and acquisition of accessible technology solutions. Overall,

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PSC employees have access to the technology solutions they need, but some are having difficulty obtaining basic equipment.

## Accessible information

74. **Criterion:** Information is produced and distributed in accessible formats.

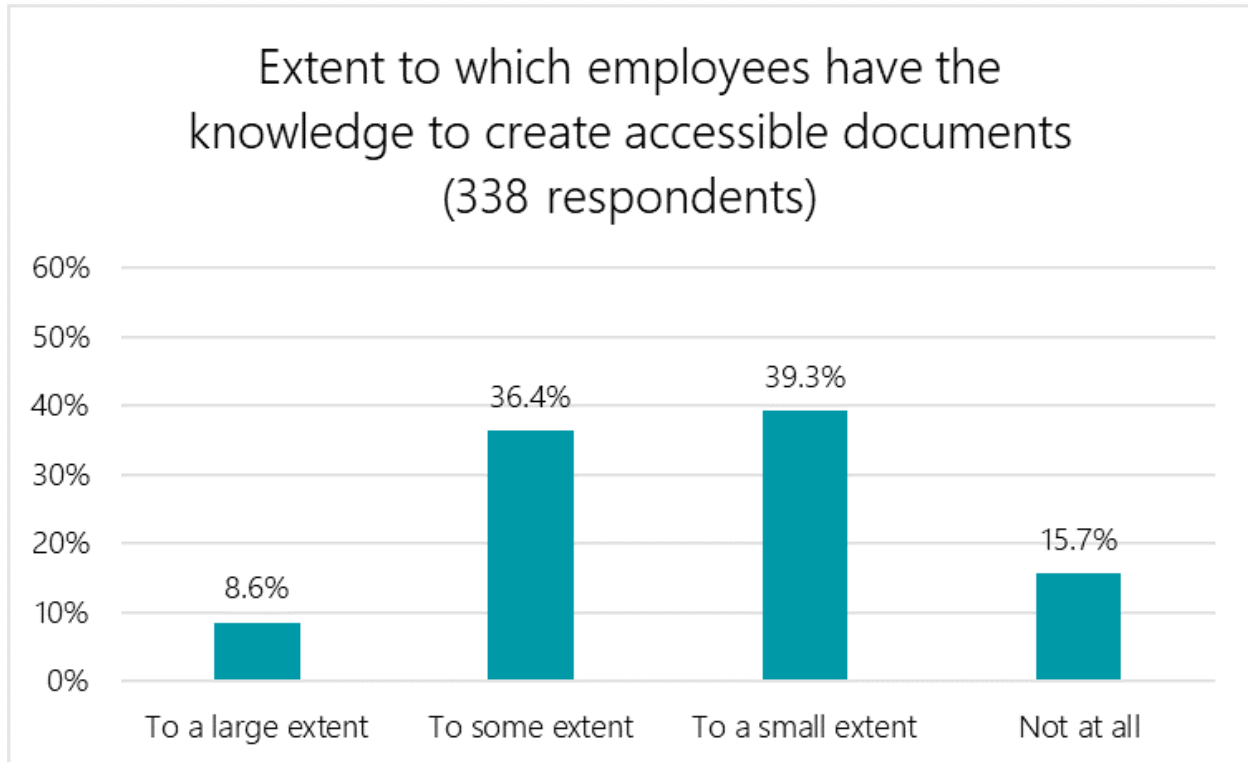
75. The Act defines as a barrier the fact that a person with a disability cannot access the same information as others. The PSC applies the standards and policy instruments adopted by the Government of Canada to govern the many facets of communications and information management in the federal government. However, the review team found a lack of consistency between the standards and the available tools. For example, the PSC's Communications and Parliamentary Affairs Directorate uses the TBS Standard on Web Accessibility for its electronic communications, in accordance with the Policy on Communications and Federal Identity. On the other hand, the PSC's Information Management Division prefers to use tools developed by Shared Services Canada's Accessibility, Accommodation and Adaptive Computer Technology program when preparing documents, including before posting them on the Open Government site. There are 3 different levels of accessibility depending on the technologies used, and the AAA level used by the Accessibility, Accommodation and Adaptive Computer Technology program is not recommended for websites. This situation creates some confusion for many of the stakeholders interviewed for this review, including those responsible for promoting accessible documents within the PSC.

76. The review team analyzed a sample of documents submitted to the PSC's Executive Management Committee using criteria outlined in the Accessibility, Accommodation and Adaptive Computer Technology Program. Various accessibility issues were identified in the analysis, including the following:

- many examples of jargon
- unexpanded acronyms
- tables, images and diagrams without alternative text
- tiny fonts and overloaded pages
- PDF files that present problems for screen reading applications

77. Efforts to develop accessible documents depend heavily on employees' ability to create the document properly from the start. In the survey, 55% of employees indicated that they had little or no knowledge to create accessible documents; only 9% said they had good capability, and 36% some capability (Figure 8).

**Figure 8 Extent to which employees have the knowledge to create accessible documents**



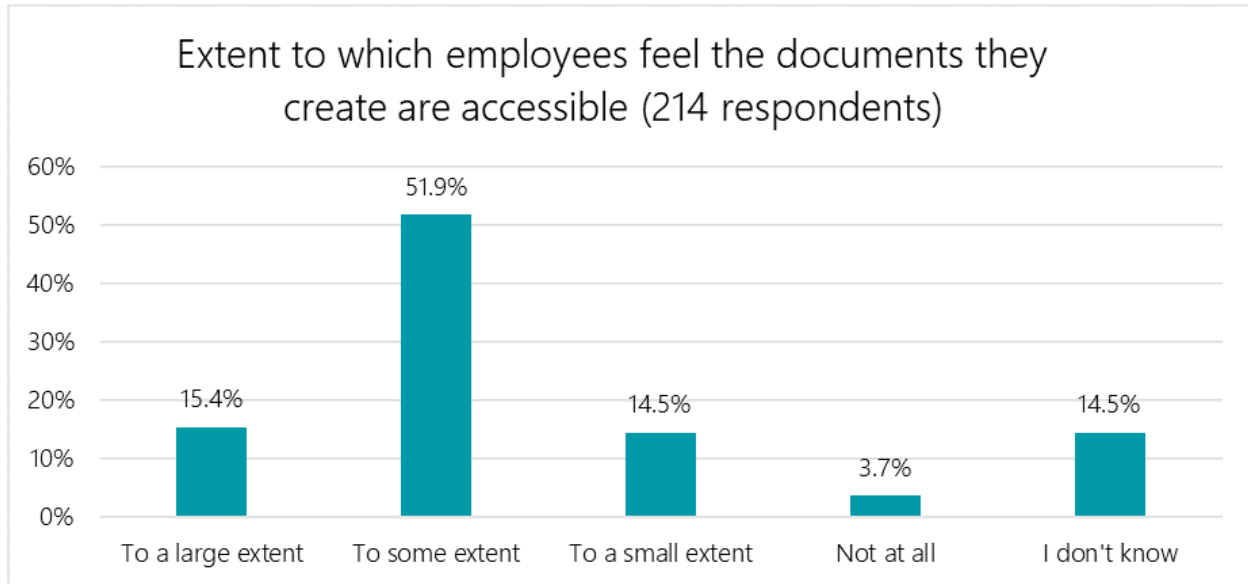
### **Text version**

#### **Extent to which employees have the knowledge to create accessible documents**

Of 338 respondents, 8.6% answered that they have the knowledge to create accessible documents to a large extent, 36.4% to some extent, 39.3% to a small extent and 15.7% answered they don't have the knowledge at all.

78. The survey also addressed employees who create documents for other employees and for the public. About one third of respondents reported that the documents they create were not accessible or did not know if they were accessible (Figure 9 and 10).

**Figure 9 Extent to which employees feel the internal documents they create are accessible**

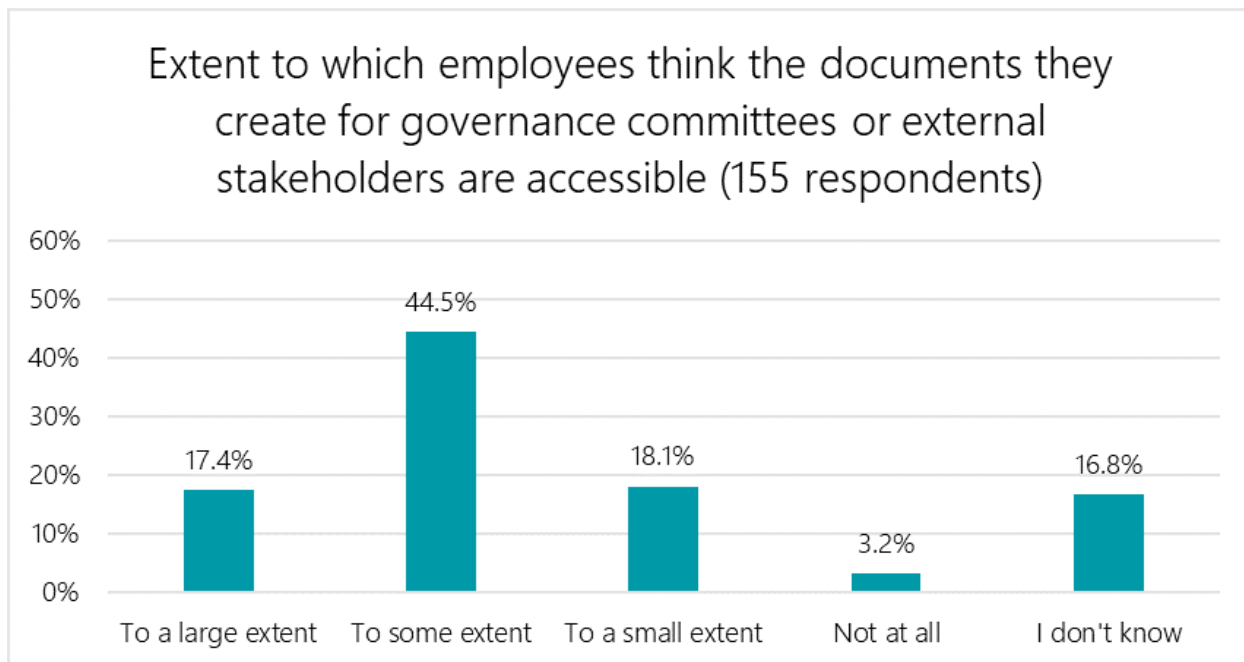


**Text version**

**Extent to which employees feel the internal documents they create are accessible**

Of 214 respondents, 15.4% responded that they felt the internal documents they create are accessible to a large extent, 51.9% to some extent, 14.5% to a small extent and 3.7% not at all. 14.5% responded that they did not know.

**Figure 10 Extent to which employees think the documents they create for governance committees or external stakeholders are accessible**



### **Text version**

#### **Extent to which employees think the documents they create for governance committees or external stakeholders are accessible**

Of 155 respondents, 17.4% responded that they thought these documents are accessible to a large extent, 44.5% answered to some extent, 18.1% to a small extent and 3.2% not at all. 16.8% answered that they didn't know.

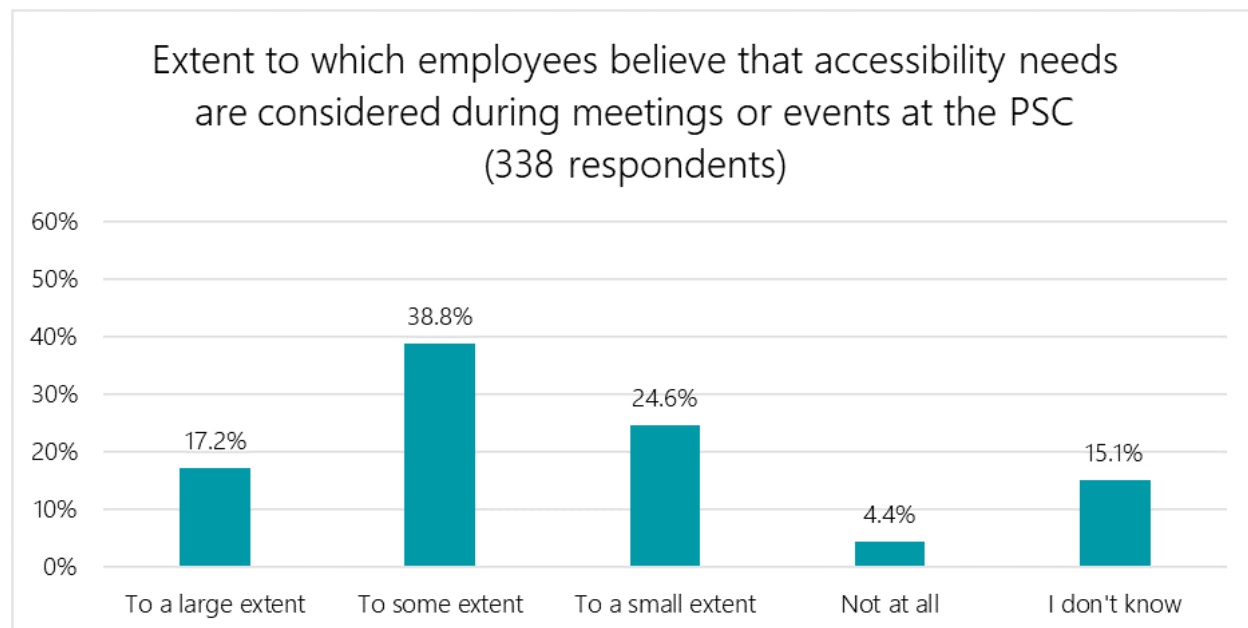
79. Although the Standard on Web Accessibility is posted in the work tools section of the PSC's intranet, there are few other tools available to assist employees in creating accessible documents. The publishing kit, also posted on Intracom, contains instructions for the old PSC template and makes no reference to accessibility. The Accessibility, Accommodation and Adaptive Computer Technology Program standards are also missing from the web page. One of the goals of the Strategy is to provide employees with resources for generating accessible content using common tools such as the Microsoft Office Suite; however, those initiatives are not yet in place. Nevertheless, good practices can be promoted now to improve the accessibility of information so that some employees are not disadvantaged. A few people interviewed for this review mentioned barriers in PSC documents, such as the colours and font sizes used in texts. The Human Resources Management Directorate took a step in the right direction in early 2021 by encouraging PSC employees to participate in the Accessibility, Accommodation and

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Adaptive Computer Technology Program's guided learning activities on inclusive design and publishing.

80. Respondents were also asked if they felt that accessibility needs were addressed in PSC meetings or activities. About one quarter of respondents said they were given a little consideration, while 4% said they were given no consideration.

**Figure 11 Extent to which employees believe that accessibility needs are considered during meetings or events at the PSC**



### Text version

#### Extent to which employees believe that accessibility needs are considered during meetings or events at the PSC

Of 338 respondents, 17.2% believe that accessibility needs are considered to a large extent, 38.8% to some extent, 24.6% to a small extent and 4.4% not at all. 15.1% said they didn't know.

81. Opinion on the accessibility of meetings or activities varied depending on their nature. For example, some respondents commented that large corporate meetings such as town halls tended to be more accessible. A number of improvements were suggested, such as sending out the content of presentations in advance and using subtitles. Smaller meetings were more challenging, particularly because of the lack of accessibility of presentation materials. A few respondents noted the importance of

identifying participants' needs, as they vary considerably. A good practice would be to ask, when a meeting is called, if anyone needs accommodation to participate fully.

82. **Finding:** Compliance with current government standards for information development and sharing is not sufficient to ensure accessibility. To make progress in this area and work toward removing barriers, the PSC will need to clarify its own expectations and equip employees accordingly.

83. **Consideration 3:** There is a need to better inform employees about the tools available to help them create accessible documents. It is recommended that the Communications and Parliamentary Affairs Directorate and the Information Management Division work together to provide tools and training for creating accessible documents for internal or external dissemination.

## Accessible procurement

84. **Criterion:** The PSC purchases accessible products and services.

85. On October 11, 2019, the TBS Contracting Policy was amended to implement the Act and remove barriers to procuring goods and services. The new rules require that departments and agencies include accessibility criteria when specifying requirements for products and services to be purchased and ensure that accessibility features are included in deliverables.

86. Public Services and Procurement Canada notes that procurement accessibility entails consideration of end-users and their expected interactions with goods and services. It also specifies that accessibility criteria are less relevant for some products, but in most cases, it may be necessary to consider the issue and consult with specialists as required.

87. The PSC has controls in place to ensure compliance with the Government of Canada's established procurement policies and procedures. Those controls include goods and services procurement guidelines, checklists, templates and service standards. After examining those documents, the review team concluded that the PSC had still not incorporated accessibility criteria into its procurement processes. Under these circumstances, the accessibility of acquired products depends on the willingness of managers and procurement officers to identify the barriers that end-users will face. However, unconscious biases could result in the PSC purchasing products and services that are not barrier-free for end-users, assuming that accessibility does not apply, or simply ignoring the issue.

88. Other government organizations have developed relatively simple controls in this area. For example, Public Services and Procurement Canada now requires the inclusion of accessibility criteria in all its purchases, including putting an explanatory note in the file when the criteria do not apply.

89. **Finding:** The Finance and Administration Directorate has controls in place to meet government procurement requirements, but they do not reflect the new accessibility rules. As a result, there is a risk that the PSC may purchase products and services that are not accessible or do not address the accessibility needs of end-users.

90. **Consideration 4:** The Finance and Administration Directorate should conduct a review of accessible procurement requirements and develop a strategy to ensure that the PSC meets them when making procurement decisions.

## 2.3 Governance

91. The review team examined whether the PSC had adopted implementation mechanisms in accordance with the Act, that is, integrating processes and structures to inform, guide, manage and monitor activities. It focused on roles and responsibilities, compliance with the duty to consult with persons with disabilities, and the objectives set.

### Roles and responsibilities

92. **Criterion:** The roles and responsibilities to support the implementation of accessibility are defined and documented.

93. In recent years, several directorates, including the Information Technology Services Directorate and the Human Resources Management Directorate, have incorporated accessibility into their planning. The next step for the PSC is to coordinate the corporate approach to meet the requirements of the Act, which states that regulated entities must, when Parliament so directs by regulation (by June 2021), prepare and publish an accessibility action plan that includes “its policies, programs, practices and services in relation to the identification and removal of barriers, and the prevention of new barriers.” After that, the Act requires that an updated version of the plan be prepared and published every 3 years. Regulated entities must also establish a process for receiving feedback on the implementation of the action plan, and allow persons with disabilities, clients and staff to report barriers they have encountered. Lastly, organizations will be required to publish progress reports on the implementation of the accessibility plan, receive feedback, consult with persons with disabilities and notify the Accessibility Commissioner.

94. The PSC has yet to determine who will be responsible for producing the accessibility plan and managing the feedback process. As part of the immediate action items listed in the Strategy, TBS is asking departments and agencies to identify an executive responsible for coordinating the accessibility strategy. None of the stakeholders interviewed by the review team felt that they had the skills, capacity or authority to undertake this task as it is beyond the normal scope of their respective directorate's responsibilities, including the Human Resources Management Directorate, which is responsible for implementing the requirements of the *Employment Equity Act*.

95. The review team consulted with key stakeholders in the areas covered by the Act to determine whether they had understood their new roles and responsibilities with respect to accessibility. Most managers and directors consulted provided examples of actions taken to improve accessibility at the PSC. For example, the Human Resources Management Directorate has taken a series of initiatives under the People Management Plan to improve the hiring of persons with disabilities. For its part, the Information Technology Services Directorate has established controls to ensure that the technology architecture includes accessible solutions wherever possible.

96. When asked about the main barriers to accessibility that remain at the PSC, stakeholders indicated that they had very little information about the situation of persons with disabilities. As noted earlier, the survey conducted by the review team showed that there were still many barriers in the workplace, most of which were not mentioned in the interviews. The establishment of a feedback process, as required by the Act, should partially address this lack of information but, more importantly, it should enable stakeholders to meet this requirement.

97. **Finding:** PSC stakeholders understand their roles and responsibilities. The PSC will need to determine who will be responsible for developing the action plan, implementing the feedback process and preparing progress reports before these requirements come into effect, at a date to be determined by June 2021.

## Consultations with persons with disabilities

98. **Criterion:** Mechanisms are in place to consult persons with disabilities during the design and implementation of the PSC's accessibility strategy.

99. Under the Act, regulated organizations must have mechanisms in place to consult with persons with disabilities. Specifically, the Act requires a regulated entity to consult persons with disabilities in developing the action plan and progress reports, and to document the consultation process.

100. In addition, TBS, through the Strategy, wants departments and agencies to build their initiatives around persons with disabilities, as indicated by its guiding principle “Nothing without us.” Among the immediate initiatives, TBS is asking organizations to establish and maintain a vibrant network of employees with disabilities and to ensure that they can voice their concerns in confidence.

101. The barriers to accessibility identified in the review demonstrate the need for the PSC to build a strong network of relationships with the community of employees with disabilities in order to understand the barriers they face. The PSC took the first step in recent months, when senior management gave the Persons with Disabilities Sub-committee a mandate to survey employees with disabilities about their experiences. The sub-committee is subordinate to the Diversity and Inclusion Committee and is composed of volunteers with and without disabilities. It is supported by a champion, who serves as a spokesperson for this community in its dealings with senior management. To comply with the requirements of the Act and the Strategy, the consultations will have to be carried out on a regular basis and will lead to discussions on the accessibility action plan to be developed by the PSC. For the time being, the success of the consultations depends largely on the drive of the volunteers on the sub-committee, with the risk that their numbers may not be sufficient to meet the requirements of the Act. At the time of writing, the lived-experiences initiative had just been launched.

102. The review team noted other PSC initiatives to integrate persons with disabilities. For example, the Information Technology Services Directorate has an application accessibility coordinator who is a person with a disability. The PSC will need to continue developing its consultation mechanisms so that they become systematic and sufficient to uphold the “Nothing without us” principle. This is especially important in informing directorates about proactive barrier-removal measures.

103. **Finding:** The PSC has undertaken initiatives to better understand the situation of persons with disabilities; however, it will need to establish consultation mechanisms to prepare its action plan and thereby meet the requirements of the Act. Systematic consultations with persons with disabilities will also facilitate the identification of barriers.

## Accessibility objectives

104. **Criterion:** Accessibility objectives have been defined by the PSC, and measures are in place to assess and report on performance.

105. The review team found that the PSC has begun to develop accessibility objectives to measure its success, particularly with respect to hiring persons with disabilities. The 2020–23 People Management Strategy includes deliverables to support the hiring, retention and promotion of persons with disabilities. The success of those initiatives will be assessed by measuring representation rates, promotion rates, the level of satisfaction with accommodation measures, etc. In addition, all stakeholders have indicated that they want to remove barriers in their respective areas.

106. In preparation for the first accessibility plan, the PSC will need to continue to establish desirable measurable objectives. The Strategy lists a series of actions to be taken immediately (see [Appendix D](#)). It also contains performance measures that the PSC can use to assess its progress.

107. **Finding:** The PSC has established objectives for recruiting and retaining persons with disabilities. It will also need to consider developing measurable objectives to assess the implementation of other aspects of the Act and the Strategy.

108. **Consideration 5:** The Vice-President, Corporate Affairs, in collaboration with colleagues, will need to clarify organizational roles and responsibilities to meet the objectives and requirements of the Act, including preparing the organization's action plan, establishing a feedback process, consulting with persons with disabilities, and collecting information on workplace barriers.

109. It is important to note that the Act also governs the services provided by the PSC as a central agency. All sectors are likely to be involved in the discussions on the action plan, the feedback process and the consultation with persons with disabilities. Therefore, roles and responsibilities must be clarified on an organization-wide basis.



### 3. Conclusion

110. This review was conducted at the request of the Vice-President, Corporate Affairs, and the Human Resources Management Directorate to support them in proactively implementing the Act at the PSC. The review showed that the PSC has made accessibility a priority in recent years. Several sectors have undertaken initiatives to promote accessibility, but more work is needed to implement the provisions of the Act. All stakeholders we interviewed during the review were interested in finding ways to increase accessibility and understood the importance of this issue, which bodes well for the next steps.

111. Overall, the PSC has put in place measures to encourage hiring persons with disabilities. It is still too early to judge the success of those measures, but the Human Resources Management Directorate already has plans to review its improvement initiatives on a regular basis to meet the 2025 objectives. Other approaches may also be considered, such as targeted recruitment and the use of pools from outside the public service. It will also be necessary to consider how the PSC can support persons with disabilities to give them equal opportunities for promotion and development.

112. Several stakeholders mentioned the importance of working toward a culture of accessibility by default, but the PSC still needs to create the conditions and automatic processes to achieve this. As a first step, the PSC will need to develop an action plan and establish a feedback process for persons with disabilities; these 2 requirements of the Act will help solidify a PSC-wide strategy and help identify and remove barriers.

113. The review identified barriers faced by employees with disabilities. Two categories of barriers merit particular attention: workplace barriers, particularly invisible barriers, and document production. In both cases, there are currently no government standards capable of ensuring compliance with accessibility requirements. The PSC will need to set its own expectations through clear objectives, as well as measures and mechanisms to evaluate its success.

114. Lastly, hiring and retaining persons with disabilities is largely the job of managers. Some managers acknowledged that they had difficulty understanding what was expected of them and lacked the knowledge to manage accommodation requests. Some employees also stated that their managers were unable to provide them with adequate support. Although this is the case for a minority of managers, it is an important issue in providing proper onboarding for new employees, removing barriers and effectively managing accommodation requests. The implementation of the Act is an

opportunity to reiterate the roles and responsibilities of employees and managers. It will also be important to ensure that the information is available and easy to understand.

115. In summary, the PSC is making progress in implementing the Act. The most recent People Management Plan is a good start, and the PSC needs to build on it. The issues identified in this report will enable the PSC to continue to remove barriers and increase diversity and inclusion in its workforce.

# Appendix A: Management response and actions

## Consideration 1

The Human Resources Management Directorate (HRMD) should continue to improve its controls, in part by introducing a process to regularly gather information about managers' needs for tools and mechanisms to assist them in effectively recruiting and integrating persons with disabilities.

## Response from HRMD

HRMD will implement a revised integration program (planned for the fourth quarter of 2020–21 or the first quarter of 2021–22); it will include reminders and links to information about accommodation to facilitate integrating persons with disabilities into the workplace.

HRMD will implement new Duty to Accommodate Guidelines (fourth quarter of 2020–21). A training session for managers will also be offered in 2021–22.

HRMD will leverage various survey results (the new post-process survey, the Public Service Employee Survey, the Staffing and Non-Partisanship Survey, the internal "Have Your Say" survey and the student exit survey) to identify accommodation measures and common learning needs related to accessibility and hiring and integrating persons with disabilities, so that new tools can be developed to guide managers (2021–22 fiscal year and continuous updates).

## Consideration 2

The Human Resources Management Directorate (HRMD), in collaboration with the Finance and Administration Directorate (FAD), should put in place a mechanism to consult employees with disabilities in order to better understand the physical and invisible barriers they face in the workplace. The consultation should support the development of solutions to individual and systemic challenges or barriers with a view to eliminating them.

## Response from HRMD

HRMD, in collaboration with FAD, will continue to engage with the Diversity and Inclusion Committee and the Persons with Disabilities Sub-committee to consult

persons with disabilities and better understand the visible and invisible barriers they face in the workplace.

Since 2020, the sub-committee has been consulting with employees on their experiences within the organization. That consultation process is under way, and interviews with employee volunteers will take place in March 2021. HRMD will use the results of those consultations to develop solutions to address individual and systemic barriers.

HRMD, in collaboration with the Internal Audit and Evaluation Directorate, will conduct a review of hiring systems to advance people management policies and practices within the organization and to identify and address barriers (planned for the first to the third quarters of 2021–22).

As part of the implementation of the new accommodation guidelines, HRMD will implement a new process (planned for the first quarter of 2021–22) to follow up with employees to determine whether the accommodation provided is appropriate. The follow-up will be carried out 1 month and 6 months after hiring. HRMD and FAD will work closely to ensure that accommodation issues can be resolved quickly.

### Consideration 3

There is a need to better inform employees about the tools available to help them create accessible documents. It is recommended that the Communications and Parliamentary Affairs Directorate and the Information Management Division work together to provide tools and training for creating accessible documents for internal or external dissemination.

### Response from HRMD

A special Executive Management Committee (EMC) meeting on diversity and inclusion at the PSC from an organizational perspective was held in January 2021.

In particular, EMC adopted the recommendation that the Communications and Parliamentary Affairs Directorate give a presentation to each sector's management committee on the existing resources for facilitating the development of inclusive and accessible communications.

The Information Technology Services Directorate will be responsible for ensuring that new systems, including hardware and software developed in-house or acquired externally, meet modern accessibility standards.

The Human Resources Management Directorate will continue to inform PSC employees of learning opportunities regarding document and tool accessibility.

## Response from the Communications and Parliamentary Affairs Directorate

The Communications and Parliamentary Affairs Directorate (CPAD) will provide each sector's management committees with an orientation session on the range of existing resources available to employees to ensure that their communications are inclusive and accessible.

CPAD will give all employees access to a new toolkit on Intracom. The toolkit will include the following:

- an accessibility checklist for employees and approvers
- accessible Word and PowerPoint templates developed by CPAD along with a user guide for PSC employees
- information and links to free tools, resources and training, available year-round through Shared Services Canada's Accessibility, Accommodation and Adaptive Computer Technology Expert Group
- all links to the relevant policies and tools

The Intracom page will be included in the integration checklist and the learning catalogue.

CPAD will include the link to the Intracom page in internal messages on accessibility and inclusion.

(Date of completion of deliverables: end of March 2021)

## Consideration 4:

The Finance and Administration Directorate (FAD) should conduct a review of accessible procurement requirements and develop a strategy to ensure that the PSC meets them when making procurement decisions.

## Response from FAD

FAD will conduct a review of accessible procurement requirements and will develop control mechanisms to ensure that accessibility is considered in purchase requests, and that all employees can fully participate in requests for goods and services.

To this end, Public Services and Procurement Canada (PSPC) is developing guidelines to ensure that future procurement projects include accessibility criteria. PSPC will work with suppliers to make Canada a barrier-free country. Once these guidelines are available, the PSC, in conjunction with PSPC's Accessible Procurement Resource Centre, will ensure that the accessibility criteria and guidelines are applied during the procurement of goods, services and facilities.

## Consideration 5

The Vice-President, Corporate Affairs, in collaboration with colleagues, will need to clarify organizational roles and responsibilities to meet the objectives and requirements of the Act, including preparing the organization's action plan, establishing a feedback process, consulting with persons with disabilities, and collecting information on workplace barriers.

## Response from VP CAS

The Vice-President, Corporate Affairs, and colleagues will clarify organizational roles and responsibilities to meet the objectives and requirements of the Act.

The Vice-President will also act on the decisions that were made by the Executive Management Committee following the special meeting held in January 2021 to begin developing the organization's diversity and inclusion action plan.

## Appendix B: Criteria

Governance supports the implementation of the Accessible Canada Act.

- a) The roles, responsibilities and accountabilities to support the implementation of accessibility have been defined and documented.
- b) The accessibility objectives have been defined by the PSC and measures are in place to assess and report on performance.
- c) Mechanisms are in place to consult persons with disabilities during the design and implementation of the PSC's accessibility strategy.

The PSC has implemented adequate controls to ensure the recruitment, retention and promotion of persons with disabilities.

- a) The PSC has implemented procedures, practices and resources to improve the recruitment, retention and promotion of persons with disabilities.
- b) Managers have the knowledge and skills to implement accessibility measures upon hiring and in the workplace.

The PSC has adopted measures to identify and eliminate barriers as it endeavours to create a workplace that is accessible by default.

- a) The PSC provides its employees with accessible technology solutions.
- b) The built environment is barrier free.
- c) The PSC procures accessible products and services.
- d) Information is produced and distributed in accessible formats.

## Appendix C: Methodology

The following methods were used in this review.

- **Stakeholder interviews.** The review team met with key managers in the relevant directorates: the Human Resources Management Directorate, the Information Technology Services Directorate, and the Finance and Administration Directorate. The team also interviewed the Disability Champion, the Chair of the Persons with Disabilities Sub-committee and other internal and external stakeholders affected by the implementation of the *Accessible Canada Act*.
- **Survey of PSC employees.** A survey sent to 897 PSC employees had a response rate of 38% (338 respondents). It contained both open-ended and closed-ended questions aimed at different groups, including employees in general, managers and supervisors, persons who requested accommodation and persons with disabilities.
- **Review of relevant documents and files.** The review team identified and reviewed key PSC documents related to accessibility, such as minutes of meetings of key governance committees, and management and planning documents of the various directorates involved. The team also consulted relevant documents from central agencies and other departments, including the Treasury Board of Canada Secretariat, Shared Services Canada (Accessibility, Accommodation and Adaptive Computer Technology) and Public Services and Procurement Canada.
- **Review test.** The review team examined a sample of Executive Management Committee documents to assess their level of accessibility, using the criteria in the Standard on Web Accessibility and criteria suggested by Shared Services Canada's Accessibility, Accommodation and Adaptive Computer Technology program.

# Appendix D: List of immediate actions to implement the Accessibility Strategy for the Public Service of Canada, according to the Treasury Board Secretariat

## **Employment**

- Review internal human resources policies and processes, in consultation with employees with disabilities, to identify how they could be more accessible and inclusive.
- Examine accommodation processes to increase timeliness and quality of service, and move to a yes-by-default approach.
- Develop resources to inform all employees of processes to receive accommodation.
- Establish a hiring target and plan based on their own context, staffing requirements, and gaps to significantly increase departmental representation so that the public service can achieve a target of 7% representation of persons with disabilities.
- Identify targets for recruiting and promoting persons with disabilities.
- Hold targeted recruitment processes to fill identified gaps.
- Enhance departmental development programs to focus more on persons with disabilities.
- Build accessibility considerations into departmental human resources plans.

## **Built environment**

- Review the built environment in consultation with persons with disabilities (employees, clients and other people who regularly conduct business in the building) to identify how it could be more accessible and inclusive.
- Ensure that any new builds or retrofits are accessible, in accordance with accessibility best practices and standards:
  - as defined by the criteria set for federal buildings
  - in collaboration with persons with disabilities
- Actively promote accessibility features and services offered in the workspace and public-facing spaces.

- Ensure that events and meetings are accessible to all employees and, where applicable, the public.
- Consult with persons with disabilities on an emergency evacuation plan, and prepare or revise the plan according to the specific needs of employees with disabilities.

### **Technology**

- Review systems, software, websites and equipment to ensure that they are accessible; where they are not accessible, develop a plan to address the accessibility shortfalls.
- Ensure that accessibility considerations are included in departmental IT plan.

### **Services**

- Develop data on client satisfaction from the perspective of persons with disabilities.
- Monitor the proportion of grants and contributions recipients who self-identify as persons with disabilities.
- Assess their programs, in consultation with persons with disabilities, to identify and remove barriers for persons with disabilities.
- Build accessibility into all new policies and programs.

### **Culture**

- Identify an executive lead to coordinate the organization's overall accessibility strategy.
- Develop and maintain a vibrant network of employees with disabilities.
- Ensure that concerns from employees with disabilities can be provided confidentially.
- Where appropriate, develop and maintain an external advisory committee that can provide advice on the accessibility of the organization's programs and services.
- Develop an accessibility roadmap (diagnostic of barriers in all 7 areas covered by Bill C-81) in preparation for Bill C-81's requirement to have accessibility plans.
- Share best practices with the Office of Public Service Accessibility and other organizations.