2022-2025 Accessibility plan for the Office of the Information Commissioner: Moving toward a more accessible OIC

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# **Executive summary**

The Information Commissioner of Canada is an Agent of Parliament whose mandate is to investigate complaints submitted under the *Access to Information Act* about various types of allegations, many of which are associated with an access request an individual submitted to an institution covered by the Act.

The Office of the Information Commissioner (OIC) supports a culture that embraces diversity and inclusion to enable the full participation of its employees, clients, and stakeholders in the delivery of its activities and its mandate. The Canadian legislative framework that supports diversity and inclusion was strengthened by the addition of *An Act to ensure a barrier-free Canada*, also known as the <u>Accessible Canada Act</u> (ACA or the "Act"), which came into force on July 11, 2019.

This document sets out the OIC's plan for eliminating barriers and preventing the introduction of new barriers over the next three-year period in the 7 priority action areas by identifying six organizational goals:

Goal 1 – Ensure that OIC employees are sufficiently equipped to deliver accessible programs and services, including an accessible complaint process to ensure Canadians can participate fully and equally and, tools and platforms they need to perform their work.

Goal 2 – Create a safe environment and a workplace free of physical barriers to improve the working environment for all OIC employees of various abilities.

Goal 3 – Remove barriers for OIC communications products by creating an "accessibility by design" culture, where staff at all levels are aware of requirements.

Goal 4 – Share knowledge and best practices widely to eliminate barriers across the public service.

Goal 5 – Create a culture of accessibility, where respect and inclusion are embedded in all aspects of the workplace and where all employees are empowered and supported to achieve their full potential.

Goal 6 – Implement accessible practices to eliminate and prevent barriers to the recruitment, retention, and promotion of persons with disabilities.

## General

The Government of Canada (GC) aspires to have a public service that is accessible by default for the Canadian public, government institutions and their workforce. This aspiration is rooted in the belief that an inclusive public service is more innovative, efficient, and productive. The goal is to make Canada's public service barrier-free.

The government has placed significant emphasis on improving the participation of persons with disabilities in the federal public service and in the Canadian workforce. The results of the 2017 Canadian Survey on Disability suggest that 6.2 million Canadians aged 15 and over (22% of the population) have a disability, though the actual numbers are likely higher. As a result of the physical, administrative, institutional, technological, and attitudinal barriers that exist in the workplace, persons with disabilities are underrepresented in the Canadian labour force. Only 59% of Canadians with disabilities aged 25 to 64 are employed, compared to 80% of Canadians without disabilities.

As the number of people living with a physical disability is expected to rise from 2.9 million to 3.6 million over the next 13 years, this nearly doubles the pace of population growth overall. Removing barriers that prevent persons with disabilities from purchasing goods and services and accessing both business and government services and employment is critical to both improving their quality of life and ensuring that Canadian society benefits from their valuable participation.

#### Who to contact about OIC accessibility issues

This plan has been a collaborative effort on the part of all OIC sectors in consultation with the Equity, Diversity and Inclusion (EDI) Committee, inclusive services as well as persons with disabilities and agents of change. This plan is a living document and will be updated regularly as new developments take place.

The Human Resources Director is designated to receive accessibility feedback and will coordinate with internal subject matter experts responsible for each of the seven priority areas to meet new obligations described under the ACA as required.

Should you have any comments or feedback, please direct them to:

Accessibility Inquiries
Office of the Information Commissioner of Canada
30, Victoria Street
Gatineau, QC K1A 1H3

Toll-free: 1-800-267-0441 (Toll Free)

Fax: 819-994-1768

Email: accessible@oic-ci.gc.ca

Accessibility Feedback Form: <a href="https://www.oic-ci.gc.ca/en/form/accessibility">https://www.oic-ci.gc.ca/en/form/accessibility</a>

Website: https://www.oic-ci.gc.ca/en/accessibility

Alternative formats of this plan are available upon request.

## The Accessible Canada Act

The GC held consultations with persons with disabilities and the disability community and heard from more than 6,000 Canadians about what an accessible Canada means to them. This consultation informed the creation of the ACA.

The ACA, which came into force on July 11, 2019, takes a proactive and inclusive approach to identifying and eliminating barriers in federal jurisdiction by 2040. It includes 7 priority areas for action:

- employment
- built environment
- information and communication technologies
- communication
- procurement of goods, services, and facilities
- design and delivery of programs and services
- transportation

Under the ACA, federally regulated entities must report to the public on their policies and practices in relation to the identification and removal of barriers by publishing their accessibility plans, feedback processes and progress reports.

Each department, agency and federally regulated employer is also required to develop an accessibility plan and report on progress made against this plan annually, starting in December 2022.

## Government of Canada context

The ACA will guide government departments, agencies, and federally regulated organizations in removing barriers to full accessibility and in their reporting obligations to demonstrate progress.

A federal workforce that is reflective of the Canadian population is viewed as essential to the design and implementation of programs and services that are bias- and barrier-free and address the needs of all Canadians.

It is important to note that the federal government has introduced many initiatives over the years to increase the representation, promotion, and retention of employment equity group

members and to systematically eliminate any barriers. Federally regulated organizations, including all federal government departments and agencies, undertake these actions consistent with the *Employment Equity Act* (EEA), which covers visible minorities, Indigenous peoples, persons with disabilities and women.

As a country, Canada is recognized globally for its support of diversity. Along with the ACA and the EEA, the Canadian Charter of Rights and Freedoms, the Canadian Human Rights Act, the Pay Equity Act, the Canadian Multiculturalism Act, and the Official Languages Act are also part of the legislative framework supporting diversity and inclusion in Canada.

# The Office of the Information Commissioner (OIC) context

The Office of the Information Commissioner was established in 1983 to support the work of the Information Commissioner of Canada. The Information Commissioner ensures that federal government institutions respect the rights that the *Access to Information Act* confers to information requesters. Protecting and advancing the right of access to these institutions information ultimately enhances the transparency and accountability of the federal government.

The Information Commissioner's primary responsibility is to conduct investigations into complaints submitted under the *Access to Information Act* about various types of allegations, many of which are associated with an access request an individual submitted to an institution covered by the Act. The Commissioner strives to maximize compliance with the Act while fostering disclosure of federal government institution information using the full range of tools, activities, and powers at her disposal.

The OIC also supports the Information Commissioner in her advisory role to Parliament and parliamentary committees on all access to information matters. It actively makes the case for greater freedom of information in Canada through targeted initiatives such as <u>Right to Know Week</u>, and ongoing dialogue with Canadians, Parliament, and federal institutions.

With a workforce of approximately 135, the Office employs investigators, lawyers, access to information and privacy analysts, public affairs experts, human resources and finance specialists, and security and Information Management/Information Technology (IM/IT) professionals.

The OIC's aim with this accessibility plan is twofold: identify, remove, and prevent accessibility barriers in the OIC's delivery of services to the public, and continue to address the accessibility needs of its employees.

# Moving toward a more accessible OIC

## Activities that the OIC already does to support accessibility

The OIC accessibility plan is supported by other relevant initiatives, including the Human Resources strategic plan (which addresses employment equity) as well as the equity, diversity and inclusion (EDI) three-year action plan (2021-2024); the designation of an EDI Champion and Wellness Action Champion; and the establishment of several joint employee-management committees that advance accessibility and inclusion in the workplace, including the EDI Advisory Committee and the Workplace Health, Safety and wellness Committee.

In addition, the OIC follows the Government of Canada Standard on Web Accessibility for all public-facing websites. This standard is based on the Web Content Accessibility Guidelines 2.0 (WCAG 2.0). These guidelines, developed by the World Wide Web Consortium (W3C), help to ensure that web content is accessible to people with a wide range of disabilities.

In 2019, the OIC launched a new external Web site, based on a Drupal Web Content Management System adhering to all WCAG 2.0-based accessibility standards and incorporating up to date safeguards to ensure ongoing compliance. These standards were also applied to the intranet when it was relaunched on the same platform several months later. Periodic updates ensure that both external and intranet sites continue to adhere to all requirements in accessibility.

In addition, to foster an inclusive hiring process, the OIC has established unconscious bias training for managers with delegated staffing authority. Central agency inventories, pools, and student placement programs for persons with disabilities are discussed and considered by hiring managers to meet their staffing needs.

As part of its regular communications activities, the OIC's intranet features information bulletins and news items related to accessibility and inclusion training and awareness events such as those offered by the Canada School of Public Service.

The OIC also provides employees with specialized accessibility equipment as required based on the results of ergonomic assessments, including for example, curved screens, screen readers and screen magnification software. IM/IT also leverages technologies, such as optical character reader to enable machine readable technologies or other types of accessibility requirements.

Finally, all employees' performance management agreements include an organizational priority, with corresponding performance indicators, related to promoting and fostering diversity, equity, accessibility, inclusion, and substantive equality of official languages within the OIC.

#### **Principles**

In keeping with the "nothing about us without us" guiding principle, this plan was developed in consultation with persons with disabilities and change agents within the OIC.

The sections below set out the planned activities identified by the OIC to achieve its 6 accessibility goals over the next 3 years, including activities that the OIC already performs to support accessibility for Canadians and its employees.

#### **Programs and services**

The OIC has identified and published its services inventory in the Promotion and Compliance sectors as follows:

- Media Relations
- Enquiries about the complaint process
- <u>Individual seeking for accommodations for a disability or for needs related to one of the</u> grounds of discrimination under the *Canadian Human Rights Act*
- Submit a complaint under the Access to information Act
- Access to information Act

The goals and related activities set out below represent the next steps that the OIC is undertaking to increase the accessibility of service management practices.

Goal 1 –Ensure that OIC employees are sufficiently equipped to deliver accessible programs and services, including an accessible complaint process to ensure Canadians can participate fully and equally and, tools and platforms they need to perform their work.

	Supporting Actions	Lead	Target Fiscal Year
1.	Conduct an OIC study/survey to seek Canadians views on how accessible OIC's complaint process is.	Communications and Public Affairs (Investigation Governance and Strategic Guidance Team)	2023-2024
2.	Review and assess the OIC investigation process from an accessibility lens and the process for notifying the OIC when accommodation is required.	Investigation Governance and Strategic Guidance Team	Ongoing

	Supporting Actions	Lead	Target Fiscal Year
3.	Explore solutions identified to simplify, when possible, all online forms, products, and client touch points to ensure accessibility and usability.	Investigation Governance and Strategic Guidance Team	2024-2025
4.	Monitor to ensure that identified solutions have the desired effect, or whether more accessibility features can be incorporated.	All sectors	2023-2024

#### **Built environment**

The built environment can have a material impact on health and wellbeing and, if optimized, can ensure that all employees and clients have equal and fair access to and use of internal infrastructure.

Goal 2 – Create a safe environment and a workplace free of physical barriers to improve the working environment for all OIC employees of various abilities.

	Supporting Actions	Lead	Target Fiscal Year
1.	Identify a work colleague to assist employees with disabilities in the context of hybrid work.	Corporate Services, Strategic Planning and Transformation Services	2023-2024
2.	Document and review evacuation plans for employees with disabilities.	Corporate Services, Strategic Planning and Transformation Services	2023-2024
3.	Ensure that smoke, fire, and other emergency alarms have visual as well as auditory alerts.	Corporate Services, Strategic Planning and Transformation Services	2024-2025
4.	Integrate an accessibility lens in the investigation of identified OSH safety issues.	Corporate Services, Strategic Planning and Transformation	2024-2025

#### Information and communications technology

Central agencies and common service providers such as Shared Services Canada and PSPC set government standards for the acquisition of software and hardware for many products and services. Their leadership is essential in moving toward more accessible infrastructure.

**Information and communication technology** is defined in the European Union Standard as: technology, equipment, or interconnected system or subsystem of equipment for which the principal function is the creation, conversion, duplication, automatic acquisition, storage, analysis, evaluation, manipulation, management, movement, control, display, switching, interchange, transmission, reception, or broadcast of data or information.

#### Communication

The GC community of practice indicates that communications is a system for transmitting or exchanging information, and that performance indicators are under development for accessible communications.

Government accessibility guidance suggests web material should be written to a grade 6 to 8 level. Consideration could be given to a plain language review of the current content for individuals requiring assistance in understanding and acting upon their access to information rights.

Goal 3 – Remove barriers for OIC communications products by creating an "accessibility by design" culture, where staff at all levels are aware of requirements.

	Supporting Actions	Lead	Target Fiscal Year
1.	Encourage staff to include plain language in their communications such as emails, reports, etc.	All Sectors	Ongoing
2.	Ensure current employees and future hires are knowledgeable about GC guidelines for usability and accessibility of content through continuous awareness training and communications.	All Sectors	Ongoing
3.	Explore methods of offering additional help to Canadians when filling out forms required to access OIC services.	All Sectors	Ongoing

Goal 4 – Share knowledge and best practices widely to eliminate barriers across the public service.

	Supporting Actions	Lead	Target Fiscal Year
1.	Promote accessibility-related tools, resources, and events, including promoting and encouraging participation in activities for the National Accessibility Week.	All Sectors Champions and Committees	Ongoing
2.	Provide accessibility learning opportunities to employees, managers, and functional specialists, including mandatory and recommended training.	Corporate Services, Strategic Planning and Transformation Services	2023-2024
3.	Promote mechanisms for employees with disabilities to share experiences and raise concerns. This includes implementing exit interview services to better identify workplace retention barriers and gaps, analyzing and acting on feedback received through the Employment Systems Review and 2022 Public Service Employment Survey.	All Sectors	2023-2024

Goal 5 – Create a culture of accessibility, where respect and inclusion are embedded in all aspects of the workplace and where all employees are empowered and supported to achieve their full potential.

	Supporting Actions	Lead	Target Fiscal Year
1.	Acquire technology with accessibility in mind.	Corporate Services, Strategic Planning and Transformation Services	Ongoing
2.	Adapt existing systems to make them accessible.	Corporate Services, Strategic Planning and Transformation Services	2023-2024 2024-2025
3.	Integrate validation for accessibility into the software development life cycle.	Corporate Services, Strategic Planning and Transformation Services	2023-2024

	Supporting Actions	Lead	Target Fiscal Year
4.	Add accessibility to the compliance assessment for new non-standard software requests, which already incorporate cybersecurity and privacy assessments.	Corporate Services, Strategic Planning and Transformation Services	2023-2024
5.	Identify and implement workstations for persons with mobility disabilities.	Corporate Services, Strategic Planning and Transformation Services	2023-2024
6.	Review the OIC built environment against the requirements of the accommodation plan and identify gaps.	Corporate Services, Strategic Planning and Transformation Services	2024-2025
7.	Ensure that training on soft skills on how to handle difficult situations is offered to public-facing staff to build awareness and understanding of persons with disabilities and accessibility issues.	All sectors	2023-2024

# **Employment**

# Goal 6 – Implement accessible practices to eliminate and prevent barriers to the recruitment, retention, and promotion of persons with disabilities.

	Supporting Actions	Lead	Target Fiscal Year
1.	Participating in internal and interdepartmental accessibility committees to acquire tools and develop accessibility expertise in staffing.	Hiring managers  Corporate Services, Strategic Planning and Transformation Services	Ongoing
2.	Review available workforce data to gain insight into gaps for persons with disabilities. This includes analyzing employee utilization rates, employee representation rates and drop-off rates at different stages of the selection process.	Corporate Services, Strategic Planning and Transformation Services	2023-2024

	Supporting Actions	Lead	Target Fiscal Year
3.	Promote talent management programs that facilitate the participation of persons with disabilities.	Corporate Services, Strategic Planning and Transformation Services	Ongoing
4.	Implement the Government of Canada's GC Workplace Accessibility Passport, a tool to help facilitate and streamline conversations between employees with disabilities and managers about the tools, supports and measures they require to succeed in the workplace.	Hiring managers  Corporate Services, Strategic Planning and Transformation Services	2023-2024
5.	Implement and promote the new self-identification questionnaire.	Corporate Services, Strategic Planning and Transformation Services	2022-2023
6.	Conduct an Employment Systems Review of internal policies and practices to identify systemic and attitudinal barriers to employment opportunities for persons with disabilities.	Corporate Services, Strategic Planning and Transformation Services	2024-2025
7.	Ensure onboarding practices are accessible. This includes reviewing and updating the OIC orientation program and checklist for new employees.	Hiring managers  Corporate Services, Strategic Planning and Transformation Services	2023-2024

#### **Procurement**

The OIC has entered into a Memorandum of Agreement with the Canadian Human Rights Commission (CHRC) for the OIC's procurement-related activities. As the contracting authority for the OIC, the CHRC will ensure that procurement-related activities conducted on behalf of the OIC comply with all legal and policy requirements, including the ACA. Accessibility requirements will be part of the procurement process from the outset. More information on the OIC's procurement-related activities and how these activities meet the requirements of the ACA can be found in the <a href="CHRC's accessibility Website">CHRC's accessibility Website</a>.

## **Transportation**

This is not applicable for the OIC.

## **Consultations**

#### Methodology

This Accessibility Plan aims to provide a path forward for the OIC to eliminate barriers and adapt to changing demographics and will be updated as new initiatives are introduced. While addressing improvements in the lives of OIC employees with disabilities is paramount, improving service to the public must also be a priority.

This plan was prepared by using other governmental accessibility approaches to ensure the understanding of central agencies' and other government departments' accessibility initiatives and to review existing related policies and procedures. The exercise helped identify existing practices and initiatives that could be adopted as a best practice across the organization.

To finalize this plan in a consultative manner, the OIC identified select accessibility representatives in each sector to contribute to the redaction of the accessibility plan. Furthermore, the OIC consulted with internal stakeholders such as the Equity, Diversity and Inclusion Advisory Committee, Executive committees and, legal services.

The OIC retained the services of Excellence Canada an independent, not-for-profit corporation that is dedicated to advancing organizational performance across Canada to review its accessibility plan for compliance with the *Accessible Canada Act* and complete consultations on its plan with an advisory committee representing the interests of persons with disabilities. Comments and next step recommendations received were integrated in the finalization of the plan.