2024 Accessibility Progress Report

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General

We invite employees and other persons who have dealt with the Office of the Public Sector Integrity Commissioner of Canada to provide accessibility-related feedback using the contact information below. You may include your contact information to receive an acknowledgment or share your feedback anonymously. The Accessibility Representative is the person designated to receive feedback.

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From the Commissioner

I am pleased to present the 2024 Accessibility Progress Report for the Office of the Public Sector Integrity Commissioner of Canada (PSIC), prepared in accordance with the <u>Accessible Canada Act</u>. This report highlights our ongoing commitment to accessibility as outlined in PSIC's <u>2022–25 Accessibility Plan</u>.

The Accessibility Plan was developed following an extensive evaluation of PSIC's internal and external operations, an analysis of best practices, a review of current Government of Canada policies and standards, as well as consultations with both employees and persons with disabilities. The Plan emphasizes crucial areas such as raising accessibility awareness, providing workplace accommodations, enhancing the built environment, as well as improving website accessibility.

This report outlines the advancements we have made over the past year in meeting our objectives and executing the supporting actions outlined in the Accessibility Plan. We also highlight those objectives that will not be met because of changing priorities, financial constraints or changes in our approach in implementing the Plan. To maintain transparency, we have listed all the Plan's objectives and supporting actions, as well as the status of each action, whether it has been completed, or if it is currently underway or scheduled for a future date.

I look forward to continuing our efforts in implementing PSIC's 2022–25 Accessibility Plan and to reporting on the progress we will make in its final year.

Consultations

When preparing this Progress Report, we conducted internal consultations with individuals who self-identify as persons with disabilities. We also held accessibility information sessions during which all employees, including members who self-identify as persons with disabilities, could provide feedback. An anonymous survey was also circulated to employees, seeking feedback on accessibility at PSIC. Given that PSIC is a micro-organization with approximately 40 employees, the specific number of employees who participated in the consultations with individuals who self-identify as persons with disabilities is omitted from this report.

Feedback

PSIC received limited accessibility-related feedback from the public again this year. We received a handful of requests to obtain various submission forms in larger font, which were all granted.

Employees have also been providing feedback to or consulting with PSIC's Accessibility Representative in situations where they felt someone accessing our services either raised accommodation issues themselves or required accommodations due to their disability. In one case, the individual indicated they required accommodations due to their disability, and that the measure required that they speak to PSIC employees over the telephone and explain the documents they were providing, as well as receive an explanation for any documents that were sent to them. This accommodation was provided to the individual.

Priority Areas

In the Accessibility Plan, we identified objectives and supporting actions to improve accessibility in eight priority areas: culture; employment; built environment; procurement of goods, services and facilities; information and communication technologies; communication, other than information and communication technologies; design and delivery of programs and services; and transportation.

We included culture as a priority area, although it is not required by the Accessible Canada Act, as it is foundational to improving accessibility.

In 2024, PSIC focused on updating an intranet page on accessibility to provide employees with various resources, including a list of general and specialized accessibility training and an anonymous feedback form. In addition, there were two sessions with employees where a part of the session was a presentation on the <u>Government of Canada Workplace Accessibility Passport</u> and another part was devoted to obtaining feedback from the participants.

<u>Culture</u>

As explained in the Accessibility Plan, our overarching objective is to foster a culture of inclusion and equity at PSIC for the benefit of employees and external stakeholders. In support of this objective, we focused on the following:

- Raising accessibility awareness so that we can proactively identify, remove and prevent barriers for employees and external stakeholders;
- Recognizing attitudinal barriers and uncovering unconscious biases, as these may exacerbate other barriers by discouraging persons with disabilities from expressing their needs; and,
- Actively soliciting feedback from persons with disabilities so that we are informed and guided by their lived experiences. Our consultations on the Accessibility Plan revealed that this is not only an effective means of identifying barriers and solutions, but it also has the potential to build trust and a sense of belonging if feedback is meaningfully considered.

Objective A: PSIC encourages employees to develop their accessibility awareness, recognize attitudinal barriers, and uncover unconscious biases.

Supporting Actions

- Include an accessibility training requirement into all employees' annual requirements, which incorporates training related to attitudinal barriers and unconscious biases.
 - Status of Action: Modified in 2024 and to be completed
- Maintain an intranet page on accessibility that provides various resources, including a list of general and specialized accessibility training.
 - Status of Action in 2024: Completed and ongoing
- Leverage learning events hosted by the Mental Health Committee to raise awareness of mental health disabilities among employees.

Progress

- Management decided that training regarding accessibility will be added to PSIC's mandatory learning requirements. While making this training an annual requirement was discussed, it was decided that given the significant amount of mandatory learning already required, it would be more practical for employees to complete it over two fiscal years.
- We verified that the completed intranet page on accessibility was up to date. We also added an anonymous feedback form on this page.

• PSIC's Mental Health Committee focused on diversity and inclusion this year, but indicated they expect to plan an event regarding mental health disabilities in 2025.

Objective B: PSIC actively solicits feedback from persons with disabilities, whether they are employees or external stakeholders, and feedback is meaningfully considered.

Supporting Actions

- Solicit accessibility-related feedback from external stakeholders (i.e., disclosers, complainants, etc.) by providing information about the feedback process established in accordance with the Accessible Canada Act.
 - Status of Action in 2024: Completed and ongoing
- Invite employees to use the feedback process established in accordance with the Accessible Canada Act, and provide details regarding how they can provide feedback anonymously.
 - Status of Action in 2024: Completed and ongoing
- Report to the Executive Committee on accessibility-related feedback at least biannually.
 - Status of Action in 2024: Completed and ongoing

Progress

 To continuously improve our processes and obtain meaningful feedback from employees, we have added a new anonymous feedback form to the intranet page. We also held two presentations to employees where we devoted a part of the session to obtaining their feedback pertaining to both external and internal information. Lastly, we also sent to employees an anonymous survey to ask for their feedback.

Employment

PSIC is committed to fostering a more inclusive and diverse workplace by implementing strategies to identify, remove and prevent barriers in recruitment, retention and promotion of persons with disabilities.

The specific objectives and supporting actions outlined below are guided by information gathered during PSIC's internal consultations and consultations conducted by the Treasury Board of Canada Secretariat when developing the <u>Accessibility Strategy for</u> the Public Service of Canada, as well as the Public Service Commission's <u>Audit of</u> <u>Employment Equity Representation in Recruitment</u>.

We found during internal consultations that employees would be reluctant to make accommodation requests and that employees with disabilities consider the process unnecessarily intrusive. These concerns seemed to be grounded in a general unease rather than specific experiences at PSIC. Employees and management showed great interest in the Workplace Accessibility Passport established by the Treasury Board of Canada Secretariat.

Objective A: Employees and candidates consider that the workplace accommodations process is respectful and efficient, and that it meets their needs as much as possible.

Supporting Actions

- Pilot the Workplace Accessibility Passport as a communication tool for employees and managers to exchange accommodation-related information.
 Status of Action in 2024: Completed and ongoing
- Include an accommodation-related training requirement into all managers' performance agreements.
 - Status of Action: This planned action was discussed and considered by the management team and set aside as not necessary since managers receive related training as part of their delegation training requirements.
- Consider establishing a workplace accommodation policy that sets out which member(s) of the management team an employee should approach with an accommodation request and includes a mechanism to track accommodationrelated information (i.e., number of requests, rejected or refused requests, accommodation type, formal assessments by a medical doctor or specialist, cost, and number of days between the request and full implementation of accommodation).

Progress

 Management has considered the possibility of establishing a workplace accommodation policy, but determined that PSIC is too small for such a policy. However, PSIC remains committed to providing personalized workplace accommodations, as it currently does.

Objective B: PSIC is proactive about the recruitment and retention of persons with disabilities.

Supporting Actions

- Explore hiring students with disabilities through the <u>Federal Student Work</u> <u>Experience Program</u>, <u>Federal Internship Program for Canadians with Disabilities</u>, or similar programs.
 - Status of Action in 2024: Completed and ongoing
- Develop incentives, such as flexible work arrangements and work-sharing opportunities, to support the recruitment and retention of employees with disabilities.
- Monitor development of standards by <u>Accessibility Standards Canada</u> regarding employment, as this has been identified as a priority area by that organization.
 - Status of Action in 2024: Completed and ongoing

Progress

- We will continue to explore hiring students with disabilities and offer flexible work arrangements for employees, including employees with disabilities.
- While specific incentives have not been developed, management remains flexible with employees' accommodation requests, in accordance with applicable Treasury Board of Canada Secretariat policies, including the direction on prescribed presence in the workplace.

Built Environment

PSIC recognizes that, in accordance with the <u>Directive on the Management of Real</u> <u>Property</u>, it is responsible for providing barrier-free access to its offices. We are committed to meeting the requirements of this standard and to proactively identifying and removing other barriers in the built environment.

During internal consultations, employees with disabilities identified certain barriers related to the built environment. These have been listed as high priority issues below.

Objective A: High priority accessibility issues identified during internal consultations are addressed as quickly as possible.

- Address accessibility of PSIC's main entrance doors and bathroom doors.
 - Status of Action in 2024: In progress

- Ensure that all current emergency evacuation procedures enable the safe and efficient evacuation of persons with disabilities, including persons with mobility, auditory and visual impairments.
 - Status of Action in 2024: In progress
- Establish a quiet, closed-door space with adjustable lighting that employees without a closed-door office can reserve.
 - Status of Action in 2024: Completed

- PSIC has been proactively working with Public Services and Procurement Canada and the building owners to obtain quotes for addressing accessibility concerns at PSIC's main entrance. Considering PSIC's current financial situation, any work on the main entrance cannot be commenced before April 1, 2025. The bathroom doors will remain a priority for future improvements.
- In addition to practising emergency evacuation procedures in cooperation with the primary tenant of the building, as they are responsible for building-wide emergency evacuation procedures, we also sought feedback from employees regarding accessibility and these procedures, and the responses were positive.
- A quiet room has been designated and employees have been informed of its availability. However, in consultation with management and employees, it was determined that a reservation system was not required at this time as employees enjoy having access on an ad hoc basis. Additionally, there is no adjustable lighting available but alternate solutions are being considered.

Objective B: PSIC's offices are accessible to employees and external stakeholders.

Supporting Actions

- Monitor the development of standards by Accessibility Standards Canada regarding emergency egress, as this has been identified as a priority area by that organization.
 - Status of Action in 2024: Completed and ongoing
- In consultation with persons with disabilities, conduct an accessibility audit of PSIC's offices to ensure compliance with the Directive on the Management of Real Property.
 - Status of Action in 2024: In progress

Progress

• Activities in support of an accessibility audit have commenced and are expected to continue into 2025, in part due to budgetary constraints.

Procurement of Goods, Services and Facilities

PSIC is committed to ensuring that any goods, services or facilities that it procures are inclusive by design and accessible by default. We also recognize that, in accordance with the <u>Directive on the Management of Procurement</u>, we must consider accessibility criteria and features when procuring goods or services.

No barriers relating to the procurement of goods, services and facilities were identified during consultations.

Objective A: PSIC implements practices to ensure that goods, services and facilities procured are accessible.

Supporting Actions

- Consider incorporating standard accessibility language developed by the <u>Accessibility, Accommodation and Adaptive Computer Technology</u> (AAACT) program at Shared Services Canada into procurement templates.
 - Status of Action in 2024: Ongoing
- Clearly define and identify accessibility requirements in tenders, requests for proposals and contracts.
 - Status of Action in 2024: Completed with prior provider and recently completed with new provider
- Monitor the development of standards by Accessibility Standards Canada regarding procurement, as this has been identified as a priority area by that organization.
 - Status of Action in 2024: Completed and ongoing

Progress

• We retained a new provider of procurement services in September 2024. We confirmed that the new provider's framework includes provisions for accessible procurement consideration. They also advised that they use the up-to-date Public Services and Procurement Canada templates, which are updated for accessibility considerations including plain language.

Information and Communication Technologies

Given that PSIC's website is the primary means by which most disclosers or complainants find information about PSIC's services and access these services, we have decided to focus on website accessibility under this priority area.

As required by the <u>Standard on Web Accessibility</u>, PSIC has worked with its external web developer to ensure that its public-facing website meets Level AA conformance with the Web Content Accessibility Guidelines (WCAG 2.0).

Furthermore, employees noted during internal consultations that PSIC's general inquiry line does not support teletypewriter (TTY) technology.

Objective A: PSIC's current website is accessible to persons with disabilities, including those who rely on screen-reader technology.

Supporting Actions

- Compile a list of accessibility issues identified during external consultations and address these issues as quickly as possible (i.e., use of headings and lists, descriptive text is used for links, links are properly labelled, issues with the cookies banner so that all content can be accessed).
 - Status of Action in 2024: Ongoing
- Include an accessibility statement on PSIC's website.
 - Status of Action in 2024: Completed
- Continue to provide sign-language translation of videos in ASL and LSQ.
 Status of Action in 2024: Completed and ongoing
- Closely monitor for revised guidance on website accessibility from Treasury Board of Canada Secretariat and monitor the development of standards by Accessibility Standards Canada regarding website accessibility.
 - Status of Action in 2024: Completed and ongoing

Objective B: Incorporate accessibility into PSIC's planned website redesign.

- Research best practices with respect to accessible information and communication technology procurement, including guidance prepared by the Accessibility, Accommodation and Adaptive Computer Technology (AAACT) program at Shared Services Canada.
 - o Status of Action in 2024: Completed
- Ensure that accessibility requirements are clearly defined and identified in procurement documents relating to the website redesign, including requirements relating technical compliance with specified standards and user testing.
 - Status of Action in 2024: Completed
- Research best practices with respect to accessible web design, including use of plain language, logical flow, alternative text with images, font considerations (i.e., size and contrast), and colour contrasting. Incorporate these best practices into the website redesign.
 - o Status of Action in 2024: Completed and ongoing

• PSIC's communications team has researched accessible web design to ensure the new website is accessible to all stakeholders, including persons with disabilities. This team has also worked diligently to ensure that procurement documents clearly define and identify applicable accessibility requirements.

Objective C: External stakeholders can use the general inquiry line to communicate with PSIC.

Supporting Action

Ensure that the general inquiry line supports teletypewriter (TTY) technology.
 Status of Action in 2024: In progress

Communication, Other than Information and Communication Technologies

PSIC produces a significant volume of written documentation in relation to disclosures of wrongdoing and reprisal complaints, including decision letters, investigation reports and report summaries. We are committed to encouraging the use of plain language as much as possible, while meeting applicable legal requirements. However, employees noted during internal consultations that use of complex or legalistic language is a potential barrier.

Furthermore, PSIC produces outreach documentation that may not be accessible to persons with disabilities, and employees participate in outreach events. We are committed to ensuring that all public servants, regardless of ability, have access to information about our services.

Objective A: The use of plain language is encouraged for all types of written documentation, including documentation relating to disclosures and complaints, internal documentation and outreach documentation.

- Monitor the development of standards by Accessibility Standards Canada regarding plain language, as this has been identified as a priority area by that organization.
 - Status of Action in 2024: Completed and ongoing
- Research best practices regarding the use of plain language and develop specialized guidance for employees involved in case admissibility analyses, investigations and communications.

• We have not yet developed specialized guidance on plain language. However, we strive to use clear language to convey complex analyses in decisions and investigation reports.

Objective B: PSIC documentation is prepared in accessible formats.

Supporting Actions

- Conduct an accessibility review of current internal and external templates to ensure they are accessible.
 - Status of Action: To commence in 2025, subject to operational demands
- Conduct an accessibility review of current outreach documentation to ensure all products are accessible.
 - Status of Action in 2024: Ongoing with new documentation and phasing out current materials as new ones are created
- Continue to provide documentation in alternate formats on request (large print or electronic format).
 - Status of Action in 2024: Completed and ongoing

Design and Delivery of Programs and Services

PSIC investigates wrongdoing in the federal public sector and helps protect from reprisal whistleblowers and those who participate in investigations. Through its activities, PSIC regularly interacts with disclosers, reprisal complainants, reprisal respondents and witnesses, some of whom are persons with disabilities.

Employees stated during internal consultations that PSIC generally grants any accommodation requests received by persons involved in disclosures of wrongdoing or reprisal complaints, but that it does not proactively offer the opportunity to make requests. Some employees also stated that lack of training on how to interact with individuals who have mental health disabilities may cause barriers.

Objective A: The disclosure and complaint processes are accessible to persons with disabilities.

- Modify the disclosure forms, reprisal complaint forms, forms to request funding for legal advice and interview invitation letters to offer persons the opportunity to make accommodation requests.
 - Status of Action in 2024: Completed

- Research existing training programs on interacting with persons with disabilities and include them on the intranet page on accessibility.
 - Status of Action in 2024: In progress

• The intranet page has links to existing training programs, but none are specifically related to interacting with persons with disabilities. We will continue to research training programs on this topic, though options appear limited without funding.

Transportation

No barriers relating to transportation were identified during consultations. Nonetheless, PSIC has identified one objective and one action in support of its commitment to ensuring that employees do not face barriers when travelling for work.

Objective A: PSIC employees are aware that transportation service providers have accessibility-related obligations and make accommodation requests as needed when travelling for work.

- Inform employees on the intranet page on travel that they can make accommodation requests directly with transportation service providers as needed.
 - Status of Action in 2024: Completed