

Immigration, Réfugiés

et Citoyenneté Canada

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Immigration, Réfugiés et Citoyenneté Canada Plan sur l'accessibilité Rapport d'étape 2023.

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Cat. no. Ci1-34E-PDF ISSN 2817-0970 IRCC-3705-12-2023

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1. Message from the Deputy Ministers of IRCC

It is an honour to introduce Immigration, Refugees and Citizenship Canada's (IRCC) first Progress Report on our Departmental Accessibility Plan.

IRCC facilitates the entry of temporary residents, manages the selection, settlement and integration of newcomers to Canada, grants citizenship and issues passports to eligible citizens. As such, IRCC contributes to building a diverse and prosperous country. Along with our own vibrant workforce in Canada and abroad, this provides a multifaceted environment within which to identify and remove barriers to accessibility for people with disabilities, and to prevent new barriers from being developed.

The Accessible Canada Act mandates a barrier-free Canada by 2040. IRCC's own Accessibility Plan aligns with the Act and was finalized at the end of 2022. This first Progress Report outlines our efforts to enhance accessibility and disability inclusion in delivering on the Accessibility Plan, and builds momentum towards a truly accessible IRCC.

The achievements being reported herein is a tribute to the level of the engagement of employees across IRCC at every level who work tirelessly to promote accessibility and foster a respectful environment where all belong. For this, we would like to offer our sincere thanks.

We would also like to highlight that IRCC is very fortunate to have a vibrant and active Persons with Disabilities Employee Network supported and endorsed by senior management. We are grateful for their ongoing work providing advice, expertise and input. While the Network is at the centre of ensuring our work on accessibility is embedded in the "Nothing without us" approach, our work will continue to broaden the degree to which IRCC's clients and employees with disabilities impact our identification and removal of barriers and our increasing success in preventing barriers from being erected in the first place.

IRCC realizes disability intersects with all of the facets that make up an individual. Part of our advances in addressing accessibility are rooted in our focused efforts in recent years to intentionally foster a culture of diversity, equitability and inclusion. This focus on culture is reflected in the launch of the Department's new Equity Branch, which occurred as part of IRCC's realignment to an integrated business structure. The Equity Branch is a centre of equity-focused expertise, providing enhanced consistency in the monitoring, oversight, and guidance of equity initiatives including accessibility, anti-racism, GBA+ policy, reconciliation among others.

Our goal is to not only deliver on our Accessibility Plan, but to demonstrate leadership more broadly across government in accessibility. We are also committed to reinforcing Canada's strong international reputation as a country of choice by helping make it the best country of choice for people with disabilities, visible and invisible.

This first Progress Report signals that we have reached a milestone on a much longer journey. While we celebrate our accomplishments, we recognize we must stay the course to realize our vision of being a department that is equitable by design and accessible by default. We will continue to strengthen our engagements with clients and employees with disabilities, and learn at all levels about identifying and removing barriers across all the priority areas of our Plan. This milestone reflects our commitment to become a truly accessible and inclusive department for all.

Christiane Fox

Deputy Minister of Immigration, Refugees and Citizenship Canada

Scott Harris

Associate Deputy Minister of Immigration, Refugees and Citizenship Canada

2. General

2.1 Executive Summary

Context

The objective of the Accessible Canada Act (ACA) is to realize a barrier-free Canada by 2040. The legislation benefits all persons, especially persons with disabilities, through the identification, removal and prevention of barriers to accessibility in seven priority areas:

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

IRCC published its first departmental <u>Accessibility Plan</u> at the end of 2022, in compliance with the ACA. The plan outlines barriers to accessibility within IRCC, and actions to take over the next three-year period to remove barriers, in the priority areas identified under the ACA. The plan also includes two additional priority areas:

- accommodation
- culture

We believe addressing barriers in these overarching areas will be pivotal to shape the workplace we aim to offer to our employees, as well as the accessible service delivery model we want to offer our clients.

Implementation Strategy and Progress Report Process

In the first year of implementation of the IRCC Accessibility Plan, we established foundational structures, processes and tools for a sustainable project and change management approach. We created a centralized team, the Accessibility Centre of Excellence (ACoE), its mandate is to:

- coordinate IRCC's efforts to identify and remove barriers
- monitor, measure and report on progress in delivering IRCC's accessibility plan, and duties under the ACA

We identified stakeholders across the Department, and clarified the roles and responsibilities for each stakeholder involved.

In preparation for this progress report, the ACoE:

- collected and analyzed data on efforts and initiatives across IRCC, as well as available reports and survey results
- identified challenges and forward planning items
- consulted with stakeholders, including persons with disabilities (PwD)
- drafted the report

This progress report highlights steps taken and accomplishments to address barriers and commitments identified in our plan. It also outlines challenges encountered and priority points of focus as we look forward to the next two years of the three-year cycle underway. In addition, the report speaks to how we met our obligations to consult persons with disabilities, as well as the process to collect feedback and how feedback received was taken into consideration by our department.

Progress

The progress we made in the past year includes the key following items:

- Observed a steady increase in representation of PwD in IRCC's workforce because of various initiatives to recruit persons with disabilities
- Efficiently engaged early adopters across the Department, such as:
 - ▷ IT Operations who work with key partners including our Employee Support Office (ESO) to equip employees with adaptive equipment and tools
 - ▷ IRCC's Communications teams who are actively involved in initiatives aimed at building awareness and increasing visibility for PwD, the ACoE and the ESO
- Confirmed the priority to shift our departmental culture and mindset, to focus on addressing barriers and allow full participation of PwD
- Conducted research on the design and delivery of client services to:
 - > understand the experience of clients with disabilities
- Included accessibility requirements in our Digital Platform Modernization programme and the design of new platforms
- Made accessibility improvements in our built environment, including installation of all access washrooms and automatic door openers

Challenges and Looking Forward

There are a number of challenges across all priority areas which may impact how we deliver on the accessibility plan. These are informing our way forward for the next two years. They include the need to:

- Stabilize resources dedicated to accessibility across the Department
 - ➤ This will ensure we comply with the ACA and our efforts are sustainable in the medium to long term
- Structure the collection and analysis of relevant data and metrics, and develop Key Performance Indicators for initiatives across all priority areas
 - This will allow us to measure progress more effectively, assess if initiatives lead to real improvements for both clients and employees with disabilities, and build accountability
- Address cultural barriers, as a condition for success in all priority areas, knowing that the creation
 of a safe environment for PwD will require time, continued efforts and a concerted strategy
 - Culture workshops are being planned in early 2024, with the end goal to develop a culture change strategy and action plan for the Department
- Analyze the departure rate of PwD in our workforce to understand if there are retention issues, and to determine what retention strategies, if any, will be required
 - We also need to address biases and stereotypes against PwD, which lead to discrimination in the workplace, as part of IRCC's culture change strategy

2.2 Contact us

IRCC will gladly receive feedback and questions on this report, our <u>Accessibility plan</u> or any other matter related to accessibility. Anyone may contact the IRCC Accessibility Officer to:

- Provide feedback or ask questions
- Request this progress report and/or the description of our feedback process in an alternate format including print, large print, braille, audio or electronic format that is compatible with adaptive technology

Our contact information is as follows:

Address: c/o IRCC Accessibility Officer

365 Laurier Ave West Ottawa, ON K1A 1L1

Canada

Telephone number: 1-833-411-6166 or 613-437-6949

Email address: IRCC.Accessibility-Accessibilite.IRCC@cic.gc.ca

Online: Accessibility feedback form



2.3 Definitions and key terminology

Ableism

Discrimination in favor of able-bodied people, which creates a discrimination or prejudice against individuals with disabilities.

Accessibility

Accessibility refers to how services, technology, locations, devices, environments, and products are designed to accommodate persons with disabilities. Accessibility means giving people of all abilities equal opportunities to take part in life activities. The term means that there has been conscious planning, design, and effort to make sure something is barrier-free to persons with disabilities. Accessibility also benefits the general population by making everything more usable and practical for all people.

Accommodation

Accommodation refers to taking steps to remove disadvantages for people that result from barriers.

Barrier

According to the Accessible Canada Act (2019):

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

Disability

According to the Accessible Canada Act (2019), disability is: "A physical, mental, intellectual, learning, communication or sensory impairment—or a functional limitation—whether permanent, temporary or episodic in nature, that, in interaction with a barrier, hinders a person's full and equal participation in society."

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

2.4 Context

IRCC's first Accessibility Plan was published at the end of 2022. It outlines barriers to accessibility within IRCC and actions to take over the next three-year period to remove barriers, in the priority areas identified under the Accessible Canada Act (ACA):

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

The plan also includes two additional priority areas:

- accommodation
- culture

We believe addressing barriers in these overarching areas will be pivotal to shape the workplace we aim to offer to our employees, as well as the accessible service delivery model we want to offer our clients.

This progress report highlights steps taken and accomplishments to address barriers and commitments identified in our plan. It also outlines challenges encountered and priority points of focus as we look forward to the next two years of the three-year cycle underway.

We are committed to adhering to the principles outlined in section 6 of the ACA. In addition, in our Accessibility Plan, IRCC laid out three goals related to accessibility that touch on and support all of the priority areas to:

- grow awareness of accessibility and disability
- coordinate and streamline our accessibility efforts
- build accountability

These overarching goals were instrumental in laying out a sound implementation strategy for our accessibility plan.

2.5 Implementation strategy

IRCC's accessibility plan implementation strategy includes efforts invested in the first year to establish solid processes, tools and reference documents for a consistent and sustainable project and change management approach. Although this strategy requires a time investment in the very beginning of the initiative, it is expected to bring long-term benefits as it will ensure clear roles and responsibilities, efficient communication channels and work processes, and enhanced collaboration between stakeholders for steady progress.

Here is a summary of foundational accomplishments in 2023:

- Created a centralized accessibility team with the mandate to build awareness and coordinate IRCC's efforts to identify and remove barriers, as well as to monitor, measure and report on progress in delivering IRCC's accessibility plan, and duties under the ACA.
- Developed an accessibility governance structure which establishes clear roles and responsibilities for stakeholders across the Department, and consolidates both project and change management responsibilities into an integrated structure. The structure is set to be implemented early 2024.
- Developed project management tools to adopt a structured approach to monitor progress and deliverables, including project schedule, RACI table, risk and issue register.
- Re-established IRCC's Accessibility Steering Committee, with revised terms of reference outlining oversight and decision-making responsibilities.

2.6 Progress Report process

In parallel to the foundational elements outlined above, IRCC also focused on a short term strategy to monitor progress made across the Department with respect to planned actions in the accessibility plan, and to prepare our 2023 Progress Report.

Here is an outline of phases and timelines in the development of our Progress Report:

- Phase 1: Creation of a centralized accessibility team (March 2023)
- Phase 2: Assessment of IRCC's current context, including barriers and commitments outlined in our accessibility plan (April 2023)
- Phase 3: Identification of stakeholders (May 2023)
- Phase 4: Data collection, including on efforts and progress, as well as reports and survey results (July to October 2023)
- Phase 5: Analysis of data; progress, challenges & forward planning (August to October 2023)
- Phase 6: Draft priority area sections and consultations (October 2023)
- Phase 7: Draft final report and early approvals (November 2023)
- Phase 8: Final approval and publication of IRCC's Progress Report (December 2023)

IRCC's centralized accessibility team, named IRCC Accessibility Centre of Excellence (ACoE), pro-actively led the following:

- Leveraged IRCC's known stakeholders engaged in the identification and removal of barriers for persons with disabilities within IRCC, who have insight on challenges and direction with respect to accessibility within their divisions and areas of interest. Teams include:
 - ➤ The Employee Support Office, responsible for providing support to employees and managers for individual accommodation requests
 - ▷ IT Operations, responsible for employee IT equipment needs
 - ▶ Internal Communications
 - > The Human Resources Diversity, Equity and Inclusion team, and
 - Service Policy and Design branch, responsible for understanding and improving the client experience through client-centric research and insights, and defining the future service design of IRCC programs and services
- Since April 2023, the ACoE held biweekly meetings with each of these teams to discuss planned actions, progress and concerns.
- Identified additional stakeholders across the Department involved with or interested in accessibility, by way of a call out email sent in May 2023 to 52 IRCC branches/divisions. This allowed the ACoE to identify 140 accessibility contacts across IRCC.
- Monitored progress made with respect to the commitments outlined in our Accessibility Plan, as well as other accessibility related initiatives across the Department, in two phases:
 - ▷ In July 2023, a progress monitoring template was sent by email to 42 branches/divisions across the Department, including the IRCC Persons with Disabilities Network (PwDN), to gather information covering the first half of the year. There were 38 responses received, including 17 NIL.
 - ▷ In September-October 2023, 25 targeted engagement email requests were sent to active stakeholders, again including the PwDN, to get additional information and accomplishments expected by the end of 2023. There were 18 responses received and 6 meetings were subsequently held to further discuss commitments and initiatives.
- Consulted recent reports and survey results to gather relevant qualitative and quantitative data to support efforts and challenges outlined, as well as forward planning.

Looking ahead

Through activities to identify stakeholders and monitor efforts, the following was highlighted:

- While there is a high level of interest for accessibility initiatives amongst various divisions within IRCC, there is an unclear understanding of ACA requirements, and of roles and responsibilities with respect to delivering on the Accessibility Plan.
- The targeted engagement activities provided an opportunity to emphasize the need to collect data and metrics to better measure and report on progress; however, additional focus is required to set clear expectations and to ensure consistency across the Department in relation to the establishment of accessibility metrics including Key Performance Indicators (KPIs).

It is expected that the newly developed accessibility governance structure, set to be implemented in early 2024, will provide much needed direction on stakeholders' roles and responsibilities as we move into year two of the delivery of our plan. Information sessions on obligations as per the ACA and Regulations, IRCC's Accessibility Plan and roles and responsibilities will be presented to all entities forming part of our governance structure, early in 2024.

In addition, as stakeholders and entities settle in to their roles and gain a better understanding of their responsibilities, we will ensure to establish a more efficient progress monitoring process where information can be collected on an ongoing basis. As well, we will leverage the expertise of IRCC's data analytics teams and work closely with leads in all priority areas of our accessibility plan to identify relevant metrics and develop KPIs to track our progress and build our accountability.



3. Consultations

Given that 27 percent of the Canadian population aged 15 years and over has disabilities, it is fair to assume people with disabilities are everywhere. Therefore "Nothing without us" is fundamental to the Accessible Canada Act. This means that persons with disabilities should be consulted when developing and implementing laws, policies, programs and services. IRCC advances this principle first and foremost through its Persons with Disabilities Employee Network (PwDN), which has a membership of 140 employees at all levels.

Indeed, the PwDN is included on an ongoing basis in activities coordinated by the IRCC Accessibility Centre of Excellence (ACoE). For example, the Champion and Chair of the PwDN are members of Accessibility Steering Committee, and regularly participate in meetings. As well, the PwDN is set to play a key supporting role in the accessibility governance structure, and take part in working group activities.

Specifically as it relates to the development of this progress report:

- The PwDN was engaged through regular emails and discussions, to provide input on progress
 to implement their two-year action plan. Planned activities are in line with the culture priority
 area of IRCC's accessibility plan, and include Trust Circles and Monthly Coffee Chats with the
 PwDN Champion.
- Draft sections of the Progress Report on employment, accommodation and culture were circulated to the PwDN for comments and input on progress and challenges outlined, as well as planned actions looking ahead.
 - Seven (7) members, including the Chair, as well as the Champion, provided valuable insight; for example, they:
 - ▶ highlighted the need to better equip managers to support employees with disabilities with accommodations, as well as with career development;
 - validated the importance to carefully consider factors that contribute to PwD leaving the Department; and
 - ▶ shared personal stories to be included as lived experience for three pillars: employment, culture and accommodation.
- The final draft of the progress report was also shared with the PwDN to gather comments and impressions on the report overall.
 - ▶ Again 7 members, including the Chair and the Champion provided input.

In addition, most ACoE team members self-identify as persons with disabilities as defined under the ACA. As such, they participate in different meetings and events held by the PwDN, and also collaborate in planning activities, including for the network's strategic plan and yearly events (National AccessAbility Awareness Week - May; Disability Employment Awareness Month - October; International Day of Persons with Disabilities - December 3). This proximity ensures the ACoE is kept apprised of concerns, barriers and issues faced by PwDN members, and provides direct access to obtain additional information as needed. The fact that most ACoE employees have disabilities, and collectively have a range of disabilities, also means that their perspective as people with lived experience is embedded deeply in ACoE's day-to-day work.

Close collaboration was also established this year between the three main entities working to support PwD within IRCC: the ACoE, the PwDN and the Employee Support Office (ESO). They meet regularly and have teamed up on a number of initiatives aimed at raising awareness, and collaborate on an ongoing basis to identify and remove barriers.

The continuous collaborative work with the PwDN ensures employees with disabilities are involved, consulted and considered.

Looking ahead

The PwDN is well established in IRCC, and we have been fortunate to be able to rely on this Network to consult persons with disabilities when needed this year, and previously. Because membership in this group is voluntary, we know there are persons with disabilities in IRCC who are not part of the Network. Moving forward, we intend to explore options to expand consultations with persons with disabilities across IRCC in order to be able to connect with employees outside the Network.

We will continue to co-create and co-develop with employees and clients with disabilities.

Continuously consulting employees and clients with disabilities and valuing their lived experiences will allow us to be equitable by design and accessible by default.

We must continue our efforts to understand the needs of our clients, how to remove their barriers and how to better serve them.

4. Priority Areas - Progress and Challenges

This progress report highlights progress made, challenges encountered and insights on focus over the next two years, across all priority areas in our accessibility plan. While IRCC is proud of the work that has been initiated, we recognize that sustained and continuous efforts are required to move ahead on the goal to create a barrier-free environment for our employees and our clients.

4.1 Employment

"I have always been open with my close colleagues about my barriers and disability. A few years ago, I was given the opportunity to lead an important project for my Branch, I was thrilled. I knew there was a lot to do and it made me a little nervous, but I felt that I had the knowledge and skills to deliver on this project. Until a close colleague started telling me: 'This is a lot for you, you know. . .' She repeated this on a regular basis, and then eventually switched to say things like 'I am telling you as a friend . . . you do not have what it takes for this project. . . I don't want you to fail and I feel sorry for you because even if you wanted to learn the knowledge and skills you require for this project . . . you wouldn't be able to do so fast enough to provide good performance.' This made me anxious but I didn't have the energy to fight back. I ended up wanting to leave that Branch for my emotional and psychological health"

— Anonymous employee

IRCC aims to become an employer of choice for persons with disabilities. To successfully recruit and retain employees with disabilities, we are committed to creating a healthy and barrier-free workplace for all employees.

In preparation for the first iteration of our accessibility plan, we determined that we need to address barriers in the hiring process around accommodations to ensure candidates have access to the information and adjustments they need. We also deemed it essential to assist managers with guidance on proactive ways to better support employees with disabilities within their units. Furthermore, it was brought to our attention that employees with disabilities feel they need to put in extra work to compensate for their disability, resulting in increased stress and fatigue. The need for additional guidance for managers around performance management and career development is considered a priority as well.

Progress to date

Commitment to Hire 5,000 Persons with Disabilities by 2025

While it has not been added as a specific action item in our accessibility plan, IRCC committed to contributing to the Federal Government's goal to hire 5,000 persons with disabilities (PwDs) by 2025 in order to increase the representation of PwDs in the public service. Based on IRCC's unique context, staffing requirements and gaps, IRCC has deemed its employment equity (EE) representation baseline objective of 9.5% as the measure for IRCC to use to monitor progress on this departmental commitment. IRCC's PwD representation on April 2nd, 2021 was 4.1% (318) with a gap of -415. IRCC's PwD representation as of October 27th, 2023 was 8.8% (1,052) with a gap of -84. Although IRCC has made great progress in the recruitment of PwDs, a gap remains, and IRCC is committed to reaching the minimum baseline of 9.5% by the end of 2024.

Several initiatives have been put in place to increase the hire rate of PwDs and to attempt to minimize the attrition impacts. IRCC's efforts for 2023 include:

- Participated in nine career fairs for PwD recruitment in Universities and organizations serving specifically PwDs and EE groups.
- Offered two employer information sessions to Diversity, Equity and Inclusion (DEI) groups in organizations in Ontario to showcase IRCC as an employer of choice.
- Added new <u>stories</u> from IRCC employees with disabilities to IRCC's <u>external careers web page</u>.
- Used DEI Youth Programs to hire students, for example 4 students hired from the High-School Students with Intellectual Disabilities Program in fall 2023.
- Created an unofficial Facebook group for Inclusion, Diversity, Equity and Accessibility (IDEA)
 Jobs, for IRCC hiring managers and job seekers to connect.
- Used various EE pools and inventories as a source of PwD talent, including:
 - ▶ The Virtual Door to Talent with Disabilities

 - Careers in Business, Project Management and Government Programs
- Attended outreach events which helped to increase candidates in the Pool Management Platform Opportunities Database, which currently encompasses 337 PwDs.

Support for Managers

Managers frequently voice their needs to get more support and tools to accompany their employees with disabilities. In the past year, personal development and training were offered to managers and recruiting partners to raise awareness, uncover biases and promote diversity, equity and inclusion (DEI) initiatives. Six different courses were promoted and utilized to better equip those supporting employees with disabilities and accessibility needs:

- HR SmartShop—Hiring 5,000 New Persons with Disabilities by 2025
- Training on Removing Barriers from Assessments
- How to Make Documents Accessible
- Adopting an Inclusive Mindset at Work
- Moving from Bias to Inclusion
- Becoming an Equity, Diversity and Inclusion Ally and Agent for Change

There are also efforts deployed at the sector and branch levels to develop or update onboarding materials to assist both managers and employees efficiently access relevant information, including accessibility supports. For example, a branch within IRCC created an Onboarding and Welcome Back Package, which was implemented in April 2023 to align with the phased Return to Office timelines. In addition, a bilingual, internet-based resource was developed and made available for new hires and existing employees to access information about accessibility supports in the new physical workplace, including key tools, training resources, contacts, information about ergonomic and healthy work arrangements, and more.



Documented Hiring Processes

IRCC has made progress in being more transparent and proactive to ensure that candidates have the information they need to understand the hiring process, what they can expect at different stages including the timelines, what types of accommodations are available and the process to follow. Activities undertaken on that front include the following:

- Prepared and provide documentation to all candidates that clearly explains all stages of the hiring process. In addition:
 - Developed an internal course for IRCC employees entitled "Applying to Public Service Jobs" which contains information about the application to the assessment phase, and encourages candidates to request accommodation when required.
- Delivered 9 employer information sessions to showcase IRCC as an employer of choice to universities and DEI networks, covering Eastern, Central and Western Regions (Quebec, Ontario, National Capital Region, Alberta) to over 500 participants.
- Updated documentation provided to candidates allowing candidates requiring accommodation to receive the information required in a timely manner. It also allows IRCC to offer candidates to be accommodated during the hiring process.
 - All staffing templates (including those in VidCruiter) have been updated to list the types of accommodations that may be requested and information on the process to follow.
 - ▷ A paragraph including types of accommodations and additional information was also integrated in assessment process invitations in July 2023.
- Launched an internal course in October 2023 entitled "Staffing 101 for Managers," a self-paced training that explains the importance of accommodation measures in a staffing process.

Challenges

With the previously identified activities, in conjunction with the new common hybrid workplace model implemented earlier this year, the Department still faces numerous challenges in achieving its accessibility goals related to employment.

Meeting IRCC's hiring goal until 2025

All federal government organizations are currently making great efforts to attract PwD talent within their workforce. Also, the late 2023 announcements around refocusing government spending to deliver for Canadians may impact the possible volume of external staffing. Both those factors add to the challenges in hiring and increasing representation of PwDs.

While IRCC has made significant progress in the recruitment of PwD since 2021-22, it equally needs to take into consideration the departure rate. The departure rate of PwD is improving in general but is slightly higher than the IRCC departure rate. More analysis will be required to pinpoint the reasons for departures to understand if there are retention issues or whether it is part of natural attrition and to determine what retention strategies, if any, will be required.

Public Service Employee Survey 2022

The recent Public Service Employees Survey 2022—data on IRCC's population shows that PwD in IRCC are more likely to be stressed, drained and have poor mental health than other employees in the Department. When compared to all other sub-populations by demographic factor, PwD were the least satisfied within the Department.

Looking forward

Recruitment and retention

IRCC will continue its recruitment efforts through targeted outreach, inclusive assessment processes, and adherence to departmental baselines. In parallel to recruitment efforts, it is essential to invest time in understanding why PwD leave IRCC. For example, are the departures mainly due to career progression or retirement, or do they occur as a result of barriers or negative experiences in the workplace. In collaboration with our employment partners, IRCC plans on collecting qualitative and quantitative data, with the goal to identify factors or strategies to increase retention of PwD.

Management Performance Metrics

Accessibility metrics will be added to performance agreements of IRCC management through the new Anti-Racism, Diversity, Equity and Inclusion (ARDEI) Index for Executives. Management will be required to report on progress and outcomes through parameters such as workforce demographics and employee feedback, with the goal of ensuring that PwD are treated respectfully, have equitable representation at all levels, and are provided accessibility-friendly programs, tools and/or services. This will ensure to maintain accountability and transparency, and as a result, it is expected that there will be continued progress on advancing accessibility measures in the Department.

The ARDEI Index will be launched as a pilot for Director Generals and Assistant Deputy Ministers before the end of March 2024. We plan on expanding the program to other IRCC executives in upcoming years.

Amendments to the Public Service Employment Act

In July 2023, amendments to the Public Service Employment Act aiming to strengthen diversity and inclusion came into force to address biases and barriers that disadvantage people belonging to equity-seeking groups. IRCC has made and will continue to make the necessary changes to adhere to the following amendments:

- Before an assessment method is used, an evaluation must be conducted to identify whether
 the method, and the way it will be applied, includes or creates biases or barriers that
 disadvantage people belonging to equity-seeking groups.
- If a bias or barrier is identified, reasonable efforts must be made to remove it or to mitigate
 its impact.

Modernized Self-Identification

With the upcoming launch of the Modernized Self-Identification Questionnaire by the Treasury Board Secretariat for all employees in the core public administration, we are planning a comprehensive departmental engagement strategy to raise awareness, explain the added benefits of self-identifying and build trust and transparency about the new questionnaire and platform. With updated definitions to align with Statistics Canada and the Accessible Canada Act, the questionnaire will offer new selections which include disabilities associated with mental health, sensory or environmental issues, chronic pain/health conditions, cognitive function, and intellectual development. While our work to improve IRCC's culture of accessibility and inclusivity for PwD is in its early stages, we are still hopeful that as a result of the campaign, the completion rates of employees who self-ID as PwD will increase. We also hope that this will provide strength to people feeling isolated, and contribute to reducing some of the stigma associated with disabilities.

Real-time access to self-identification data through a standardized, secure system will also be beneficial to better understand and address the needs of our PwD workforce. IRCC is committed to building an inclusive work environment where differences are valued and all employees feel respected, safe and have a sense of belonging. This will ensure that as an employer of choice, we effectively fulfill our department's commitment at all career levels.

4.2 Built environment

IRCC has a large footprint both inside and outside Canada. In Canada alone, we have a total of 42 work sites in 26 cities, including 26 client-facing offices. IRCC works with a number of different partners and suppliers across the country in ensuring accessibility of all our physical locations is achieved.

We aim to remove built environment barriers at every IRCC work site to benefit both our clients and our employees. To work towards this goal, we determined that we need to understand the needs of our clients and employees with disabilities. We need to know the current state of accessibility at our locations and as IRCC does not own the buildings we operate in, we need to collaborate closely with key partners to deliver lasting accessibility improvements in our built environment.

Progress to date

Building owner—tenant discussions

IRCC is a tenant in the office spaces we occupy. Because of this, we don't have full control of all actionable parameters related to accessibility in our built environment. To address this barrier, we attend regular meetings with property managers or landlords with the support of Public Services and Procurement Canada (PSPC). Discussions focus on current and planned projects to address needs and required upgrades, including applicable standards and work schedules. Accessibility projects discussed have included:

- installation of all-access washrooms
- automatic door openers
- elevator modernization

Accessibility improvements

IRCC works in collaboration with PSPC to ensure our buildings meet accessibility standards. We have made progress on a number of initiatives and building enhancements aimed at improving accessibility, including:

- Implementation of all-access washrooms (AAW) in all IRCC worksites across Canada:
 - AAWs are single stall, gender-neutral and fully accessible. They provide equal access and accommodate the diverse identities of all employees.
- Installation of automatic door openers (ADO) in National Capital Region (NCR) buildings as well as regional offices.
- Installation of sit-stand desks including monitor arms, and ergonomic chairs in NCR as well as
 in select regional offices.

Here is a summary table of accessibility initiatives across regions with status and estimated percentage of completion:

Accessibility Initiatives	Region(s)	Status	Estimated Completion %
All Access Washroom (AAWs)	National Capital Region	In Progress	85%
All Access Washroom (AAWs)	Pacific, Western, Eastern, Ontario, Atlantic	In Progress	35%
Automatic Door Openers (ADOs)	National Capital Region	In Progress	65%
Automatic Door Openers (ADOs)	Pacific, Western, Eastern, Ontario, Atlantic	Early Stages	Not started
Sit-stand Desks (including monitor arms) and Ergonomic Chairs	National Capital Region	In Progress	Ergo chair: 100% Sit stand: 75%
Sit-stand Desks (including monitor arms) and Ergonomic Chairs	Pacific, Western, Eastern, Ontario, Atlantic	In Progress	Surrey, BC: 40% Edmonton, AB: 40% Montreal, QC: 40% Kitchener, ON: 45% Fredericton, NB: 45%

In addition, barriers are identified and accessibility improvements are made to our built environment on an ongoing basis as a result of individual requests for accommodations or feedback received from employees. For example, in the last year, a total of 30 requests for accommodations in the built environment were initiated. More than 75% sought to address a sensitivity to light or noise. This indicates it may be relevant to include such considerations in new fit-up projects for the benefit of all employees across our offices.

Challenges

IRCC follows current standards and guidelines provided by PSPC for any office fit-up project we undertake. Given standards evolve over the years, and also that IRCC has such a large footprint across the country, some offices are compliant with previous PSPC Government of Canada fit-up standards while others have been upgraded to current fit-up standards, as applicable at the time the project was completed. While we strive for consistency across our offices, at this time, our limited resources are dedicated to addressing accessibility as we deliver on IRCC's National Program of Work (target list of accommodation projects including accessibility initiatives) and attending to individual duty to accommodate requests as required. As well, we are committed to address any barrier to the accessibility of our client-facing office spaces reported by the public using our feedback process. Conducting systematic reviews of our physical spaces has been challenging in this context, thus for now accessibility assessments are only completed on an as-needed basis to respond to individual needs.

Looking forward

Over the next two years, we will continue to:

- Improve accessibility of our built environment through building enhancement projects.
- Hold regular discussions with PSPC and other stakeholders to ensure effective project delivery.
- Respond to individual accessibility needs of IRCC employees.

As well, we will seek to:

- Better understand the perspectives of persons with disabilities through built environment consultations, namely with the IRCC Persons with Disabilities Network.
- Measure our progress more effectively by structuring the collection and analysis of relevant data and developing Key Performance Indicators for initiatives under the built environment priority area.
- Collaborate closely with PSPC in connection with new built environment standards currently being developed by Accessibility Standards Canada (ASC) with a view for IRCC to potentially become an early adopter of these new standards.

In addition, accessibility in IRCC's international locations remains on our radar and we intend on initiating collaboration with our Global Affairs Canada (GAC) partners who hold responsibility for our offices abroad.

4.3 Information and Communications Technology (ICT)

Information and communication technologies play a central role in the business IRCC conducts. Our systems, software and tools are used around the clock in service delivery and communication with our clients, as well as in all business enabling and supporting activities within the Department.

IRCC's goal is to create conditions in our department where employees and clients with disabilities are able to experience full ICT capabilities, to match their needs and expectations. As we work towards this goal, we are committed to focus on the following barriers to accessibility in ICT:

- Gaps or delays for employees with disabilities to access systems and software currently used at IRCC.
- Access to information about tools and supports available to employees.
- Confusion around the current process to request accessible ICT solutions and delays.
- Lack of flexibility for employees to adjust their own computer settings.

Progress to date

Early engagement with respect to accessibility has been witnessed in IRCC's Digital Strategy, Services and Innovation (DSSI) sector. Our IT Operations Branch, in charge of all employee hardware and software, has dedicated resources to Accessibility, Diversity, Equity, and Inclusion (DEI):

- In addition to the manager, two (2) employees were onboarded in July 2023 to oversee project management.
- Four additional employees responsible for technical support are expected to be hired by January 2024.
- The branch strives to identify and eliminate technological barriers faced by employees to create a workplace where employees can feel comfortable to log in to work every day.
- The branch incorporates the methodology of equity by design, and is dedicated to ensuring that operational IT equipment and software are accessible, equitable, and inclusive for all employees.
- The dedicated resources collaborate with internal and external stakeholders, and have been
 actively building working relationships with IRCC's Employee Support Office (ESO) and
 Accessibility Centre of Excellence (ACoE), Corporate Communications, branches within
 DSSI (such as Information Management/Data, Cyber Security Branch and Application
 Development Branch) as well as Shared Services Canada and Microsoft.
- The branch pays attention to various accessibility parameters when drafting emails,
 PowerPoint decks and Word documents to ensure inclusivity and usability of their
 communications and documents. The resources aim to also establish a comprehensive
 accessibility checklist for executive's use when sending out branch-wide communications.

Awareness of ICT tools and supports

The IT Operations Branch is involved in initiatives aimed at improving accessible ICT tools and supports, and promoting awareness, including the following:

- Work has begun to compile a list of hardware and software available to be shared with employees:
 - A review of existing lists, databases, inventories and purchase trackers to identify assistive technologies is underway;
 - > A master list for IRCC has been initiated in collaboration with the ESO, and includes
 - existing Microsoft Office functions; and
 - ▶ available assistive and adaptive hardware and software that are currently or will be offered to employees.

- An upgrade of the Microsoft Office suite to the 365 version is being planned for a department-wide rollout (timelines to be determined).
 - The Office 365 beta pilot was deployed to 42 users and a projected total of 300 users are expected to pilot Office 365 by the end of December 2023.
 - Accessibility is one area where new or improved features are expected, pending usability testing in our environment. Features include: <u>Accessibility Checker</u>, <u>Accessibility Assistant</u>, Immersive Reader and Dictation.
- Training on accessibility features in Microsoft are being planned:
 - ▷ A pilot training "Activate Accessibility in the Modern Workplace" is being delivered on December 4–5, 2023 by Microsoft to a pilot group of up to 20 participants in IT Operations. The training includes Windows 10 or 11 accessibility features, features within Office apps (Word, PowerPoint, Excel, Outlook), Microsoft Teams, and other relevant tools.
 - A second pilot training on "Accessibility and Inclusion in Teams Meetings" is expected in 2024. This training focuses on the accessibility features of Microsoft Teams and how to successfully use these features to drive better meetings and outcomes.
 - Following the pilots, training is expected to roll out department-wide in 2024 and 2025.

Accessible ICT request process

The IT Operations Branch also collaborates closely with the Employee Support Office (ESO) on an ongoing basis to support the implementation of employee accommodation requests. The ESO keeps up to date with new tools, resources, software and adaptive technology and make bulk inventory purchases to ensure quick access for employees. For example, as of October 2023: 28 Dragon, 14 TextAloud, 15 F.lux and 1 Kurzweil licenses had been purchased, in addition to renewal licenses for software that had been previously deployed, for a total of 88 licenses purchased for 8 different software. This significantly reduces wait times for employees to access the adaptive solutions they need. When software is in stock, the average time from requests in the Action Request System to install is under 5 days. Average wait time if software is not in stock is 1.5 months due to procurement timelines.

In addition, IT Operations and ESO have initiated work aimed at streamlining the request process for accessible ICT:

- A review of the current processes and workflows between IT Operations and ESO for employee requests for assistive technologies has been launched;
- This will allow for a better understanding on what processes are working well between the teams and what processes need attention, and will guide next steps.

Access to current systems and software

Branches in the Digital Strategy, Services and Innovation sector, such as the Application Development Branch, currently perform accessibility compliance testing on an ongoing basis before application releases and upgrades, for both client-facing and internally used applications. They are assessed and fixed where possible for Web Content Accessibility Guidelines (WCAG) 2.1 standards, and a variety of tools such as WAVE Extension for Chrome, AChecker, Axe DevTools or W3C Validator may be used. Progress made by the Application Development Branch includes:

- Approximately 15 client-facing electronic service applications and portals currently used have been assessed this year, in addition to a number of Legacy portals and applications.
- Defects identified are being fixed by order of priority, as per applicable standards.
- The Passport Digital Services online application being developed, to give access to Canadians to a variety of passport services online, was assessed and adjusted to be compliant with WCAG 2.0.
- Approximately 80 internal applications are now under assessment.
- It is expected that most will meet accessibility standards, with a few limited exceptions:
 - in the case of applications targeted to be decommissioned;
 - in the case of applications with known defects, to be addressed by order of priority.
- Of note, there are "Custom off the shelf" (COTS) type software used internally in IRCC which cannot be modified to fully comply with accessibility standards given we do not have control over the COTS application code. Efforts are being made to connect with vendors to obtain updates which could provide accessibility improvements.

Accessibility assessments are included in the development of new applications at IRCC. For example, this is the case for the new Client Experience Platform (CXP), which is part of IRCC's digital modernization programme currently underway. CXP features are subject to assessments as they are developed and become available.



Challenges

While the intent is to conduct a formal ICT assessment of all IRCC systems, hardware, and software being used, to identify gaps in accessibility and take steps to address the barriers, there are a number of challenges, including

- Volumes: time and effort to review hundreds of systems and tools.
- Moving target: new applications are continually being added and existing applications are continuously evolving.
- Requirements to meet accessibility obligations: applicable to multiple browsers, on multiple platforms, using multiple screen reader technologies.
- Lack of technical expertise within IRCC to conduct reviews and address issues.
- Significant rewrite required for some internal applications: funding and additional resources would be needed to do this work in parallel with the current maintenance and development activities.

We continue to seek accessibility improvement as we research accessible/adaptive tools, supports and software on an ongoing basis. However, availability of these accessible tools and training materials, may be limited. In addition, complexity and delays of the procurement process create challenges in getting assistive and adaptive software and tools in a timely manner.

Looking forward

In the next two years, we intend on further developing initiatives underway, as well as working on the following:

- Centralizing and improving the IT accessibility request process
- Setting IT service standards
- Building resource expertise in accessibility in IT
- Increasing licenses, hardware, and software in inventory
- Establishing accessible default settings in Microsoft Office, as the 365 suite is rolled out across the Department
- Preparing and implementing a communications strategy to ensure information about accessible ICT tools, supports and the request process is made available to all IRCC employees, including during new employee onboarding
- Expanding training on accessibility features in Microsoft products to all IRCC employees
- Developing internal accessibility expertise in system design

4.4 Communications

The nature of IRCC's business positions our department as a gateway to Canada for people entering and settling in the country. As such, IRCC must show leadership by adopting inclusive and accessible practices in all its communications.

IRCC is aware that communications are not consistently fully accessible in our department. This barrier seems to be compounded by limited awareness and knowledge amongst IRCC staff on accessible communications and on available resources and tools to ensure the accessibility of communications.

Progress to date

Awareness and promotion

Our approach to addressing these barriers starts with actions aimed at raising awareness and increasing knowledge and understanding of disabilities and barriers. These are also foundational to the culture change IRCC would like to implement.

IRCC has put concrete steps in place to support and promote accessibility, led by IRCC's internal communications division, for example:

- An internal Accessibility Communications Plan for 2023 2024 was drafted, approved and is being implemented.
- Between May 2023 December 2023, over ten intranet pages were created and promoted in the internal IRCC newsletter, Today@IRCC, including:
 - The Accessibility Centre of Excellence (ACoE) homepage published in August 2023, which consists of the Accessibility and Disability Inclusion at IRCC Resources Guide, and a link to the accessibility online feedback form (818 views).
 - ➤ The Employee Support Office (ESO) homepage, published in May 2023, where employees and managers can find information on how to obtain support for accommodation needs and how to remove individual or specific barriers encountered in the workplace, as well as related resources (456 views).
 - Personal story blogs by employees living with disabilities, such as:
 - ▶ "The courage and joy of being disabled and gay" June 2023 (864 views)
 - "Living with vulnerability" July 2023 (1,468 views)
 - ▶ "Redefining 9 to 5: thriving professionally with narcolepsy" September 2023 (130 views)
 - ▶ Letters from accessibility leaders, such as "A world without barriers: Celebrating accessibility for all" message June 2023 (1,130 views).
- An accessibility campaign was developed and launched through the collaborative efforts of
 internal communications with the ESO, ACoE, members of the Persons with Disabilities Employee
 Network (PwDN) and the PwDN Chair and Champion. The Accessibility Avenue Campaign will
 be promoted in Today@IRCC monthly from November 2023 to September 2024. It focuses on

increasing knowledge and understanding about disabilities, barriers and practical resources to make IRCC more accessible, including accessible documents and communications.

- In 2023, IRCC internally celebrated four commemorative events:
 - National AccessAbility Awareness Week (NAAW) 2023 from May 28-June 3: promoted through an intranet post showcasing the history of NAAW, inviting staff to participate in an employee challenge, and sharing helpful tips for creating a barrier-free workplace and events.
 - Disability Pride in July 2023: highlighted with a personal story where an IRCC employee opened up about her reality as an employee living with a disability and about her experience as a manager.
 - Disability Employment Awareness Month (DEAM) in October 2023: promoted in Today@IRCC on numerous occasions through articles, a personal story, and internal events:
 - ▶ "Brave Space: intersectional identities in the workplace" on October 19, 2023. This event is held with PwDN and Latin American Employees Community for DEAM and Latin American Heritage Month
 - ▶ "IRCC's Disability employment discussions How we can do better" on October 25, 2023. This event features a guest speaker and PwDN Champion as they host a forum to engage in meaningful conversations about disability employment awareness
 - ▷ International Day for Persons with Disabilities on December 3, 2023: one internal event and personal stories.
- IRCC's internal newsletter, Today@IRCC, promoted government-wide accessibility events, such as:

 - With challenge comes resilience: Self-advocating throughout your career (October 2023)
 - Neurodiversity in the workplace: From accommodation to empowerment (October 2023)
- Developed and launched two bilingual MS Teams backgrounds to support and increase the visibility of the Persons with Disabilities Network:



Figure 1 - Image description in Annex

Figure 2 - Image description in Annex

In addition, IRCC is updating a new Accessibility section for employees on the intranet, including new content to support persons with disabilities, which is expected to be completed by early 2024.

Visibility on the IRCC Website

In September 2023, a new link to the <u>Accessibility at IRCC</u> webpage was added on <u>IRCC's</u> <u>departmental page</u>, under the "About Immigration, Refugees and Citizenship Canada" section. The Accessibility at IRCC page is where users find IRCC's Accessibility Plan, our feedback process description and online feedback form. The new link streamlines information about accessibility at IRCC for anyone landing on IRCC's main institutional webpage. This improvement resulted in a traffic increase to the accessibility content. From December 2022 to November 2023:

- The <u>Accessibility page</u> has received 10,711 visits
- The Accessibility plan page has received 1,893 visits
- The <u>Feedback process page</u> has received 718 visits

Assessing communications

To address the barriers outlined, IRCC has committed to reviewing its communications for accessibility against rigorous federal accessibility standards applicable to various communication products or mediums, including PDFs and web.

There is a best effort to ensure that IRCC intranet pages for employees meet current Government of Canada accessibility standards, including being WCAG 2.0 compliant. This includes pages with information on program guidance, security and emergencies, human resources and more.

While data on the performance and use of many employee-facing resources on the intranet is currently limited, there is also work being done to improve web analytics and establish performance indicators for intranet content.

In addition, there seems to be a growing momentum around accessibility in communications, as more and more branches within IRCC are applying an accessibility lens when reviewing and updating materials. For example:

- New learning materials developed on IRCC's documents and information management system used IRCC-wide are being reviewed to ensure they are accessible, including for reading order, colour contrast, alt text and plain language.
- IRCC's immigration functional authority division sought direction from the ACoE on accessibility as they began the review of their functional guidance intake form. This form must be completed by any employee seeking program guidance.
- A division within IRCC's Corporate Services Sector reached out to the ACoE for tips on creating an accessible newsletter template for branch-wide distribution.

With reference to IRCC's external-facing website, all content is required to meet accessibility/Web Content Accessibility Guidelines (WCAG) 2.0 standards before it can be published. If content cannot be published in an accessible format, for example if a PDF isn't accessible, an accessible HTML version of the document is coded. IRCC's Web team reviews all new content to ensure it meets the Government of Canada's Policy on Service and Digital, including plain language and web optimization. The Web team is also monitoring how standards are evolving and preparing to adapt its publishing practices accordingly to continue to meet Canada.ca standards.

Challenges

The most significant challenges with reviewing our communications are linked to the volume of materials to be reviewed, and the associated level of effort required in an environment where we need to be responsive to evolving priorities. Extremely tight timelines and operational pressures do not always permit thorough pre-launch accessibility reviews or content optimization.

- There is an extensive volume of PDFs on IRCC's external and internal website that are not accessible. To meet accessibility standards, they are accompanied by accessible HTML equivalents, when possible, to mitigate barriers.
 - On the external site, tight timelines sometimes necessitate the publishing of inaccessible PDFs only, with the HTML version to follow later when coding time permits.
 - On the Intranet, many PDFs are not accompanied by an HTML version.
- New accessibility standards (coming into force to be determined, expected in 2024) will require that any content be published in accessible format, thus all PDFs will need to be accessible.
 - ➢ For now, the creation of accessible PDFs is outsourced to vendors on an ad hoc basis, is very costly and time consuming.
 - ▷ To produce accessible PDFs internally, IRCC will need to re-think publishing processes, train staff and equip them with the required software.

Additionally, the goal for all communications at IRCC to be accessible by default faces challenges including:

- IRCC employees having limited knowledge about accessible communications, and on resources and tools available to develop their skills.
- Operational pressures and tight timelines do not always allow for thorough accessibility review of products.
- Lack of clarity on who holds the responsibility to ensure that various products prepared across the Department are accessible.
 - For example, beyond PDFs, many different teams develop web products (tools, Apps, etc.) and accessibility assessments are done differently depending on the product build, the product owner, or, in some cases, the contractor involved.
- A collective shift in mindset that will require time and sustained effort.

Looking forward

Moving forward, as improved Web Content Accessibility Guidelines 2.1 are expected to become standardized for the Government of Canada, we will:

- Put in efforts to establish priorities for the review of existing web content.
- Leverage new guidelines and train content creators across IRCC on the importance of accessible PDFs and creating content with a web-first and mobile-first approach.

IRCC is in the process of procuring a new intranet platform, which will enhance the content capabilities, functionalities and accessibility standards of our current platform. The new platform will be compliant with applicable standards and will modernize IRCC's intranet.

Over the next two years, IRCC will:

- Continue promoting existing resources and guidance on creating accessible content and documents department-wide.
- Build awareness and understanding that the responsibility to learn how to develop accessible content and documents is shared by all staff, at all levels.
- Continue improving the accessibility of our social media content.
- Continue to monitor any changes in Treasury Board Secretariat's accessibility guidelines and ensure the IRCC website meets these guidelines.

We will also turn our attention to various document templates available internally bearing IRCC's visual identity to ensure accessibility features are embedded and facilitate the output of accessible documents. At the same time, this will allow us to assess and enhance capacity within IRCC design teams to include accessibility considerations at the onset while developing communication products.

In addition, because communications play a role in every accessibility priority area, the Department is working on establishing a working group comprised of experts in communications as well as working-level representatives from all priority areas. They will be tasked to develop a strategy for IRCC employees at every level to enhance knowledge and support the development of habits concerning accessible communications, both internal and external.

4.5 Procurement of goods, services and facilities

Procurement of goods, services and facilities is an essential business enabling function in IRCC. Our goal is for accessibility to be fully considered in all aspects of procurement in our department. In preparing our first Accessibility Plan, assessments were conducted and concerns were raised that accessibility may not be taken into consideration or documented on all procurement. In addition, it has been highlighted that procurement of inaccessible ICT systems and software creates barriers for IRCC employees with disabilities to succeed.

Progress to date

Assessing tools and supports

IRCC is committed to ensure that its employees with disabilities have access to the tools and resources required to do their job and intends on prioritizing accessibility when acquiring systems and software. Through its mandate of facilitating accommodation solutions for employees, IRCC's Employee Support Office (ESO) plays a proactive role in researching, assessing and purchasing assistive and adaptive software and tools that help in removing barriers for employees with disabilities and others. The ESO keeps an internal list which is updated regularly as processes and tools evolve and new software or tools become available. The ESO collaborates with procurement and IT colleagues to streamline the purchase process for assistive and adaptive tools and software.

Considering and documenting accessibility

IRCC's Procurement and Contract Management division, responsible for contracts that exceed \$10K, uses standard forms which document accessibility considerations and requirements, and consistently keeps complete contract files as per the Treasury Board's <u>Directive on the Management of Procurement</u>.

This division also owns an intranet page on Procurement and Contracting Services, which is the central point of reference for procurement activities to all employees at IRCC, and includes resource links on accessibility in procurement, for example, the Public Services and Procurement Canada (PSPC) Information Nugget: "Accessible Procurement: Inclusive by Design, Accessible by Default."

To further address concerns outlined on whether accessibility is being considered and documented for all procurement, the Procurement and Contract Management division has undertaken work to enhance guidance provided across the Department, including to:

- Update the existing "Procurement File Checklist for Purchases under \$10K," which is available on the intranet page to assist those responsible with proper file management. It will be updated to include a requirement to complete the "Considering accessibility criteria in procurement—justification form" and retain it as part of the procurement file.
- Prepare a new guidance document to be added to the central intranet page, which will
 include instructions on proper file documentation.

The documents are expected to be completed and added to the central intranet page in March 2024. In the interim, the intent is to share them within the Department by the end of December 2023, by way of a bulletin to IRCC employees.

Nonetheless, divisions across IRCC are increasingly paying attention to include accessibility as part of procurement processes. For example, in a multi-year project underway for the procurement of information management and professional services, accessibility was identified as a component of the expected deliverables. The request for proposal developed for bidders specifies that all electronic non-web documents created will need to adhere to specific accessibility standards. It also includes a Statement of Work on the Department's commitment to accessibility.

IRCC's Digital Modernization Programme

Accessibility has also been considered at the onset of IRCC's major transformation project currently underway. The Digital Platform Modernization (DPM) programme will introduce a new client experience platform (CXP) which will enhance user experience, as well as a new case management platform (CMP) providing employees with more streamlined working processes and improved access to the data and tools they need to do their jobs. The procurement process for the CXP includes accessibility requirements as described in the following standards and guidelines:

- Web Content Accessibility Guidelines (WCAG) 2.1 standards
- Government of Canada <u>Standard on Web Accessibility</u>
- Treasury Board Secretariat <u>Guideline on Making Information Technology Usable by All</u>

The contractor is required to provide a plan/roadmap that demonstrates how the service provided will conform to at least 90% of WCAG 2.1, level AA within an agreed upon timeframe, including deficiencies that will need to be addressed, and how/when they will be addressed. This roadmap is expected to be made available to IRCC before the end of March 2024.

The same requirements will be included in the request for proposals for the CMP, expected to be published by January 2024.



Challenges

Accessibility requirements vary depending on the procurement exercise, and requirements may be incorporated within the contract, or as either mandatory or rated criteria. For example, for contracts that are awarded following a bidding process, inclusion of accessibility criteria directs bidders to provide information to satisfy they meet the criteria.

IRCC is dependent on directives and guidance provided by PSPC, for example with respect to the number of points that can be attributed to rated criteria. This may be limitative in terms of impact to enhance accessibility in procurement processes, also taking into consideration the level of effort that may be required to validate if bidders or service providers meet the criteria.

Looking forward

Additional efforts will be engaged shortly to further develop guidance and training for IRCC staff on accessible procurement, including:

- Overhaul of the central Procurement and Contracting Services intranet page, making
 procurement tools and resources for IRCC stakeholders and procurement officers more easily
 accessible. For example, relevant links will be added, such as the Accessibility Hub and the
 PSPC Information Nugget: "Meaningful Consideration of Accessibility in Procurement."
- Update the "Complementary guide on procurement at IRCC" currently available on the intranet, including instructions on accessible procurement.

As well, over the next two years, as we turn our attention to develop a structured procurement plan for ICT systems and software, we will establish clear roles and responsibilities for divisions and stakeholders involved, in order to ensure we prioritize accessibility when acquiring materials and that input from persons with disabilities is sought. This includes, but may not be limited to: IRCC's IT Operations, Procurement teams, ESO and Persons with Disabilities Network.

In addition, we will seek to establish Key Performance Indicators for initiatives under the procurement priority area, and to structure the collection and analysis of relevant data. This will allow us to measure progress and identify areas for improvement more effectively, as well as build accountability.

4.6 Design and Delivery of Programs and Services

Program and service delivery to clients in Canada and all over the world is at the heart of IRCC's mandate. We are responsible for a wide range of programs and services in core areas including immigration, asylum, settlement, citizenship and passport.

As we work towards making all our programs and services fully accessible, we recognize the importance of identifying barriers to be addressed at the outset and considering accessibility during the service design phase. We have also identified the need for clarity and structure around accountability and responsibility within our department to ensure that accessibility is included in the design and delivery of our programs.

Progress to date

Awareness, training and tools

IRCC's approach to addressing barriers includes promoting awareness of accessibility and equipping employees with training and tools on accessible programs and services, for example:

- The "IRCC Accessible Service Delivery Playbook" was published on our intranet, and can be
 used by any IRCC employee who would like to better understand accessible service delivery,
 whether in-person, over the phone, digitally or through letter correspondence. The tool
 has been promoted on a number of occasions through internal communications, lastly on
 September 27, 2023.
- Instructional designers and developers in IRCC's Learning Academy (central learning centre):
 - Completed Digital accessibility awareness training (13 participants).
 - Completed an advanced eLearning accessibility programme (leading to certification based on <u>CPD Standards Office</u>); 6 participants are now certified practitioners.
 - Developed and implemented an accessibility checklist to their work processes.
 - ▷ Created an accessibility tool to navigate features in Rise 360 training application.
- The "Design for Usability and Accessibility and Resource: Best Practices for Digital Modalities" standard was included in the IRCC National Training Standards, a foundational reference guide for whoever develops training in IRCC.
- A number of operational training materials were reviewed and adapted for accessibility, including various passport courses, and materials on decision-making and document examination.

In addition, various educational materials were developed on topics such as perspectives on dealing with disability issues, barriers per category of disability, and etiquette for communicating with people with disabilities. Four different products are currently under review and will be considered as part of assessment and priority setting activities to be undertaken by the IRCC accessibility learning working group, set to be established in early 2024.

Research and Input From Persons With Disabilities

IRCC believes that research, testing, and input from persons with disabilities, are essential to the understanding of the challenges that persons with disabilities experience. The results of this research (including surveys, engagement, and feedback) are taken into consideration in the design and delivery of our programs and services. Research conducted includes:

- A research project involving semi-structured interviews with over 40 people, including 14 clients with disabilities and their families, which resulted in a number of ideas for innovation. As a result:
 - A <u>welcoming statement</u> about IRCC's diversity and inclusion values to encourage people with disabilities to apply to our programs, was posted on the IRCC website.
 - ➤ This research project also is informing the development of a "tell-us-once" approach to accommodations for clients with disabilities, to support limiting the number of touchpoints where clients need to disclose a disability (part of IRCC's Digital Platform Modernization programme).
- A workshop with middle managers responsible for improving client experience to identify
 accessibility gaps as well as to gain a better understanding of issues that impede the design
 and delivery of accessible programs and services. A total of 20 employees participated in the
 workshop and subsequent discussions.
- An internal survey of selected branches across IRCC to take stock of initiatives in the area of
 design and delivery of accessible services to persons with disabilities. A total of six branches
 were selected as respondents for their roles in the delivery of services to IRCC clients, in
 Canada and abroad.
 - - ▶ Develop resources, guidance, training and tools on accessible services and programs.
 - ▶ Define roles and responsibilities within the various divisions involved in design and delivery of programs and services, as well as priorities with respect to accessibility.
 - ► Standardize and establish a consistent approach across programs to meet IRCC's goal towards making IRCC programs and services accessible by design.

Designing services for the future

IRCC's Digital Platform Modernization (DPM) programme is changing the way we work and deliver programs and services to clients. Accessibility is built into the design of DPM projects, through the implementation of a Quality by Design (QbD) Playbook which includes an Equity by Design dimension that aligns with Treasury Board Secretariat accessibility guidelines. This Playbook defines IRCC's approach to proactively design and build equity into its products and services from the outset, and includes readiness assessment tools with accessibility components. These tools will be used to ensure the consideration of equity and accessibility in projects throughout the lifecycle of the digital modernization programme.

Other initiatives

Other initiatives across IRCC seeking to understand our clientele with disabilities, and to make impactful changes in the design and delivery of services include the following:

In Settlement Program delivery

- The Newcomer Outcomes Survey (NOS), administered annually since 2018, collects information from newcomers on their resettlement, settlement and integration experiences. An area of enquiry includes client experience related to whether they were/were not able to receive the proper accommodations for their disability. In 2022, a question was added to allow survey respondents to identify as having a disability. Analysis of the results from last year's Survey is underway and will create an initial baseline for future comparison of challenges or improvements, if any. In addition, consideration may be given to whether there are additional questions that could be included to better inform future analysis, such as Statistics Canada's Disability Screening Questionnaire.
- Data collection through the Immigration Contribution Agreement Reporting Environment (iCARE), captures key characteristics of services used by clients of IRCC's Resettlement and Settlement Program, such as whether a client will require provisions for disabilities in order to continue accessing services, as well as an indication of when clients receive provisions for disabilities while receiving services.
- IRCC's Settlement Program includes provisions to facilitate access to services by clients with disabilities. In the 2024 Call for Proposals (CFP) for the Settlement and Resettlement Assistance Programs to be delivered in 2025, persons with disabilities are one of the demographics considered as a population with increased barriers to service access. We aim to ensure funding for targeted services that are designed or enhanced to meet the needs of these populations, in addition to providing support to reduce barriers to access, such as digital supports and equipment. In addition, to ensure accessibility of the CFP materials for all applicant organizations, all materials will be provided in an accessible format for the application process.

In Passport Program delivery

Two new policies expected to reduce barriers during the application process are being implemented by IRCC in the fall of 2023:

- Instructions to the Government of Canada employees providing in-person Passport Program
 delivery services to the public that they must offer assistance when requested to applicants
 who are unable to fill out travel document application forms independently due to a disability.
- Operational guidance for accepting a passport application from a third party applicant
 who submits the passport application on behalf of an adult with a mental incapacity. This
 policy provides the requirements to ensure that third parties interacting with the Program on
 behalf of individuals with a mental incapacity are duly authorized to do so, resulting in better
 protection of this vulnerable clientele.

In Citizenship Program delivery

- In September 2023, a facilitative process was implemented with respect to waivers based on compassionate grounds. Clients who are unable to demonstrate they can meet certain requirements of the *Citizenship Act*, such as language and knowledge of Canada, can now submit a request for a waiver along with their citizenship grant application and include supporting evidence. This new measure allows for a transparent and informed process for applicants with disabilities.
- A number of Citizenship Program digital tools have been developed and implemented
 in recent years through which accessibility considerations were embedded including
 e-applications, an online test, virtual interviews, issuance of e-certificates, and virtual
 ceremonies. An accessibility by design approach was adopted in the development of these
 solutions and they are compliant with the Government of Canada accessibility standards.

Other

Divisions across IRCC are undertaking Anti-Racism, Diversity, Equity and Inclusion (ARDEI) initiatives, and actively building in accessibility considerations in this work, for example

- For immigration lines of business, under the umbrella of racial equity, work has been
 undertaken to review functional guidance materials and to create tools for functional
 direction authors to identify, address and prevent multiple types of bias, including against
 persons with disabilities. It is expected to lead to more equitable decision-making.
- A specific Accessibility and ARDEI section is in the process of being added in the Citizenship
 Program Crisis Management Response Framework. With respect to accessibility, it aims
 to identify areas where measures would need to be considered and planned, as well as to
 evaluate crisis response through an accessibility lens, with a view to improve accessibility
 measures and instructions for our processing networks and affected clients.
- The Citizenship and Passport Programs Branch (CPPB) is also applying the Racial Impact Assessment Tool (RIAT) to all of its products. The tool will help identify areas where the branch can improve accessibility.

Challenges

IRCC is seeking to increase capacity to deliver on accessibility initiatives across our department, in particular as it relates to the design and delivery of accessible digital and non-digital client services. Without increased capacity and a dedicated commitment to this work, challenges are expected, and progress in improving the delivery of accessible client services will likely remain slow and inconsistent across channels, programs and services.

Another significant challenge revolves around our ability to concretely demonstrate that initiatives and actions undertaken will lead to improvements for our clients with disabilities. There currently is a lack of data to measure inequalities for persons with disabilities in access to our programs and services, for example in wait times, correspondence, documents and evidence required, or decision outcomes.

Looking forward

Looking forward to the next two years, we will:

- Further develop our research and testing capabilities, including consultations with persons
 with disabilities, in order to anticipate and overcome the challenges they face, through
 innovative design and delivery of our programs and services
 - This may include usability testing with persons with disabilities before a new product or service is launched, or standardizing the use of web accessibility validation tools
- Strengthen accountability by clarifying roles and responsibilities with respect to accessibility within various divisions involved in the design and delivery of programs and services
- Establish a policy/framework working group, responsible for supporting the development of new frameworks, procedures, and guidance on accessibility to help us meet our commitments toward "Accessibility by design" for our programs and services
- Define benchmarks and performance indicators to hold ourselves accountable and track our progress in delivering accessible programs and services such as:
 - Adding demographic questions and additional indicators in annual client experience surveys to allow comparison in the service experience of persons with disabilities vs. those without

4.7 Transportation

IRCC did not identify any barriers in the area of transportation through the review of our policies, practices, programs and services.

Looking forward, in preparation for the second iteration of our accessibility plan in 2025, we will carefully examine upcoming guidance on this priority area, and adjust the scope of our analysis, as needed.

4.8 Accommodation

"I was diagnosed with narcolepsy when I was 16. Narcolepsy is an autoimmune disorder that causes my brain to kill off the neurotransmitters that control my sleep and wake cycles. As a result, waking behaviours intrude into my sleep, and sleeping behaviours intrude into my wakefulness. This results in a myriad of symptoms, including excessive daytime sleepiness, which can cause irresistible episodes of sleep; micro-sleeps, where the brain is partially asleep, but the body is awake; insomnia; and hypnagogic or hypnopompic hallucinations, that is, dreaming before falling asleep and after waking up, resulting in visual, auditory and tactile hallucinations, sleep paralysis, and for some, cataplexy—in my case, a whole-body paralysis triggered by any strong emotion, such as laughing, crying or fear. My accommodations (a flexible start/end time and exemption from working in the office) were key in helping me succeed in previous departments and in IRCC. They enabled me in countless ways. I now have the energy to focus on my home life, in addition to my work life, because I'm not debilitated by pure exhaustion every night after work. It's empowering, and it puts me on a more equal footing with my colleagues, enabling me to be both the employee and the person I've always wanted to be."

— Anonymous employee

IRCC recognizes that the presence of barriers hinders the full and equitable participation of persons with disabilities in society and in the workplace. As such and because of the critical impact on persons with disabilities, employees and clients, the Department has decided to include Accommodation as an overarching pillar in the accessibility plan. IRCC's goal is to raise awareness on barriers and accommodation solutions and also to create a workplace culture where managers and employees begin and continue to have conversations to identify and remove barriers with respect and compassion in a timely manner.

Progress to date

Employee Support Office (ESO)

A key element of progress for accommodations in IRCC is the establishment of the Employee Support Office (ESO). Created in 2022, the Employee Support Office now provides a full one-stop service for managers and employees looking for assistance in identifying barriers in the workplace (related to all of the prohibited grounds of the Canadian Human Rights Act) and implementing accommodation solutions. The ESO team has developed expertise in identifying solutions for persons with disabilities based on all types of barriers experienced, which can be structural, attitudinal, physical, technological, and more.

The ESO adopts a "yes" approach to their requests, meaning the presence of the barrier is not questioned, it is acknowledged from the start, leaving room for an immediate collaborative approach to find individualized solutions. They launched their Intranet page in May 2023.

Caseload metrics

Since April 2023, the ESO has:

- Received 153 requests for support on grounds of disability; to date, 93 were resolved successfully.
- Supported 19 employees in filling out their <u>Government of Canada Workplace Accessibility</u>

 <u>Passport</u> and in having discussions with their manager.

Other important data includes:

- 85% of accommodation requests were based on a disability ground
- In 57% of cases, the managers initiated first contact with the ESO
- In 30% of cases, employees initiated first contact with the ESO
- Over 25% of cases were linked to the Return to Office mandate
- 3 is the minimum number of partners involved for each request
- 88 assistive software licenses have been purchased by the ESO, since April 2023, for 8 different software

Collaboration with stakeholders

One of ESO's objectives for 2023 was to build strong partnerships and encourage synergy with key internal service providers:

- Labour relations (LR)
- Facilities/Accommodation
- Information Technologies (IT)
- Occupational Health and Safety (OHS)
- Human Resources (HR)
- the Office of Conflict Resolution (OCR)

Ongoing collaborative work was also established with other internal stakeholders:

- the Accessibility Centre of Excellence (ACoE)
- the Persons with Disabilities Network (PwDN)
- the Diversity, Equity and Inclusion team within HR

In parallel, the ESO has successfully fostered relationships with partners outside of IRCC, such as:

- Healthcare professionals
- The Accessibility, Accommodation and Adaptive Computer Technology (AAACT) team at Shared Services Canada
- Treasury Board Secretariat's Office of Public Service Accessibility (OPSA)
- Teams within other departments offering similar services
 - > to remain up-to-date and share best practices and resources

Since January 2023, the ESO worked with the Labour Relations team in 24% of cases. 10% of the cases required the support and involvement of the facilities team to provide the accommodation, and 26% engaged the IT team. In 10% of the cases, the ESO either referred the client to OCR or was referred by OCR. The ESO has worked with AAACT in 7% of the cases to find solutions.

Streamlined approach

As a result of the following measures, the ESO has been able to reduce the delay to implement accommodation solutions for employees, by an average of 4 weeks:

- Purchasing of commonly used adaptive software licenses in advance; 88 purchased in 2023.
- Developing standard operational procedures with key internal service providers.
- Developing resources and tools to support case managers within ESO in finding solutions to accommodation requests.

Other initiatives

GC Workplace Accessibility Passport (the Accessibility Passport)

The ESO is the dedicated entity at IRCC providing support to employees and managers. They present the Accessibility Passport to managers and guide employees when developing their own passport, as part of the accommodation process. The ESO took part in the Accessibility Passport "User design sessions," the "Digital strategy working group" and they are using the Accessibility Passport as a tool to identify barriers and help implement solutions. The ESO has also participated in the "Train the trainer" sessions organized by the Office of Public Service for Accessibility (OPSA) to be able to train employees and managers on the use and benefits of the Passport. In 2023, the ESO and OPSA provided accessibility presentations open to all IRCC employees.

Staffing Processes

IRCC's staffing advisors usually refer hiring managers to the Public Services Commission (PSC) for accommodation requests made by candidates during a selection process. The ESO can help support hiring managers and staffing advisors with certain types of accommodations.

It is common practice for staffing advisory teams to provide accommodations to candidates during selection processes. They adopt a "Yes Approach," by not questioning the barrier and by ensuring they collaborate with the candidate to seek necessary and relevant information to ensure requested accommodations are put in place. The staffing teams have updated their assessment invitation email templates used in selection processes to encourage candidates to request accommodations and provide examples of different types of accommodations. Staffing will be updating their job posters to include stronger wording encouraging candidates to request accommodations and promoting the ESO. When hired, new employees see the services offered by the ESO as early as in their offer letter, encouraging a proactive approach for accommodations to be provided on the first day at work.

The departmental Champion for Persons with Disabilities has had to intervene in staffing processes where IRCC employees felt they were being discriminated based on their disability. Most of these were tied to accommodations requested as part of the various assessment phases of the staffing process. Going forward, the departmental Champion will have assistance in the form of an Ombuds reporting into the new Equity Branch who will be able to play a role in helping employees who feel that they have faced discrimination based on their disability, and have not been able to get appropriate resolution of their complaint.

Challenges

Need for support

Employees in general still express the need to gain a better understanding of the accommodation process. Managers have also shared that they lack knowledge and confidence to properly support employees opening up about their individual barriers.

Culture

We still need to make significant efforts to shift from focusing on the impairment to focusing on the barrier. This perspective is at the heart of the ACA. Many employees feel uncertain and fear judgment and stigmatization about requesting an accommodation in the workplace. This may be reinforced by lived experience and compounded by intersectional factors and, as a result, may prevent employees with disabilities from making requests that will help remove barriers. Much of the current focus remains on disability being a labour relations issue instead of a social issue focused on ensuring the workplace environment allows each employee to participate fully. In parallel, managers often feel vulnerable and unsupported when seeking to identify and remove barriers. A culture change is essential to meeting ACA requirements.

Looking forward

Knowledge support

In the coming year, efforts will be invested to develop material, tools and information sessions to help managers gain confidence in their abilities to support their employees experiencing barriers. As well, to the benefit of all employees, information sessions will continue to be delivered collaboratively by the PwDN, the ESO and the ACoE. The intent is to reach all branches across the Department.

Metrics and Information

Data on accommodations requested by PwD who apply to external staffing processes are currently unavailable. Discussions to explore ways to develop data gathering processes and tools will be initiated with relevant stakeholders.

Culture

As detailed in the section that follows, we are planning on developing and implementing a culture change strategy and action plan aimed at operating a shift in mindset across IRCC. Key partners such as the ESO and employees with disabilities will be included in both the development and implementation stages of the strategy and plan. A central element will focus on ways to ensure attention is on the barrier rather than on the impairment when considering accommodation needs, and that one size does not fit all when it comes to individual accommodations. Parallel efforts will be invested in raising awareness on accessibility and disabilities, as well as the benefits of requesting accommodations.

4.9 Culture

"For many years after my diagnosis, I tried to hide my disability because I was afraid of what my managers and colleagues would think... I was nervous and afraid to be judged and I didn't want people to think I was not able to do my job anymore. I never heard people talk openly about disability or even about ensuring PwD feel included. Asking for accommodations was difficult as I knew I was going to have to provide minimal explanations on my personal situation to my manager to get help... probably many medical certificates as well... I felt isolated and vulnerable... unsure about my professional future."

- Anonymous employee

While preparing its first Accessibility Plan, IRCC realized that to be successful in each priority area of the Accessible Canada Act (ACA) a deep-rooted culture of accessibility and inclusivity for persons with disability needed to be established across the Department. It was decided to include "culture" as an overarching additional area of interest, which is meant to act as a condition for success of the work accomplished across the ACA priority areas. One of the goals being to dismantle stereotypes and biases around disability and to ensure that every employee feels supported and valued not only for what they contribute but for who they are.

Progress to date

While there is a lot of work ahead on the culture front to dismantle biases and stereotypes, the Department has made significant progress in 2023 to address the barriers identified.

Centralized Approach

Several central entities and processes were established in the past year:

- In March 2023, IRCC's Corporate Sector created the Accessibility Centre of Excellence (ACoE), a centralized team whose primary responsibility is to ensure the Department's compliance with the ACA. Team members coordinate, streamline, monitor, measure and report on ACA work and progress to identify, remove and prevent barriers for persons with disabilities.
- The Employee Support Office (ESO) is the Department's centralized point of entry for all
 accommodation requests. Their mandate is to assists employees and managers in getting the
 tools, support and measures needed for an inclusive and barrier-free workplace and to ensure
 the sound application of the Duty to Accommodate. In 2023, this team gained significant
 visibility and maturity in the Department.
- The IRCC Accessibility Steering Committee (SC) was re-activated. This committee is comprised of Executive level members from all ACA areas of interest across the Department. In July 2023, the Terms of Reference for the Committee were updated and approved to formalize their strategic mandate. In 2023, the Steering Committee held five meetings.
- Intranet centralized resources: in August 2023, IRCC internal communications published
 the new ACoE page on IRCC's intranet, increasing visibility for accessibility and the new
 team. This page provides centralized access to accessibility support, resources, services, tools
 and training for all IRCC employees. It also is a way to promote IRCC's anonymous online
 feedback form.
- Development of an accessibility governance structure: this centralized structure applies to all entities across IRCC who are involved or interested in the removal of barriers for persons with disabilities. It is meant to aid in ensuring ACA compliance, clarity of roles and responsibilities, efficient coordination, accountability, steady progress and a consistent approach across the Department. The governance structure has been strategically developed to merge both project management and change management processes to secure progress in both aspects.

Consultation of Persons with Disabilities (PwD)

Involving PwD in the design and development of laws, policies, programs, services and structures is one of the foundational principles of the ACA and IRCC recognizes the importance to consult persons with lived experience. It is with the ongoing collaboration of IRCC's Persons with Disability Network (PwDN), a well established network since 2014, and with the collaboration of persons with disabilities (PwD) within IRCC volunteering to consultations and providing feedback when needed, that it was possible this year to move forward on the accessibility mandate.

Other initiatives

Raising awareness

Removing attitudinal barriers towards PwD starts by raising awareness and educating on accessibility and disability. Here is a summary of IRCC's efforts in 2023:

- A Resource guide for employees and managers was developed and published on the Accessibility CoE page, including courses, tools and references.
- Presentations:
- "Accessibility Avenue", an awareness campaign launched in November 2023, including monthly communications destined to educate, raise awareness and address barriers faced by PwD.
- Eight neurodivergence workshops were delivered by the ESO to employees across IRCC.

Persons with Disabilities Network

In 2023, the PwDN adopted a very pro-active role by ensuring constant communications with its members and with internal partners. Network members were consulted continuously and were part of different activities along with the Employee Support Office and the ACoE. An essential part of the Network's efforts this year evolved around activities to nurture the feeling of safety for members. Here is an overview of PwDN accomplishments:

- Yearly events: the Network led the planning and presentation of departmental events to celebrate National Accessibility Awareness Week (May), Disability Employment Awareness Month (October) and International Day of Persons with Disability (December 3rd).
- Held its first strategic planning session in December 2022, facilitated by the PwDN
 Champion. A two-year work plan with concrete deliverables for the PwDN was developed.
- Hosted monthly coffee chats to facilitate connections between members. In 2023 so far six events were held, each with average of 15-20 participants.
- Initiated work to establish a trust circle to allow members to speak openly without fear of reprisal. The first trust circle is being hosted in December 2023.
- The PwDN held several meetings in 2023:

 - Chair and champion meetings to discuss planning and issues (10 meetings)
 - Deputy Minister (DM) meeting to discuss the Return to Office directive and challenges for PwD (Over 50 PwDN members were present)

Challenges

Several reliable sources confirm the presence of discrimination and harassment against PwD across the country and the Public Service. Recent reports confirm the challenges and risks encountered by PwD as victims of harassment, discrimination, biases and cultural barriers in the workplace. For example:

- The recent <u>Public Service Employees Survey 2022- data on IRCC's population</u> shows that PwD in IRCC are more likely to be stressed, drained and have poor mental health than other employees in the Department. Survey results also show they are more likely to suffer from harassment and discrimination at work. 18% of the IRCC respondents with a disability have been victim of harassment and 16% of discrimination in the past year.
- The Public Opinion Research conducted by the Office of Public Service Accessibility (OPSA) <u>Study of Causes and Impacts of Harassment and Discrimination of Persons with Disabilities in the Federal Public Service</u>. Most participants in the research published in July 2023 said that their experience of harassment and/or discrimination negatively impacted their day-to-day work and that their experience of harassment and/or discrimination impacted their personal/private life.

The recent data cited above support the need to work on culture change within our department, to establish a safe environment for PwD. This will require time, continued efforts and a concerted strategy.

Looking forward

Culture change

The challenges mentioned above reinforce the need to move forward on developing a culture change strategy and action plan for IRCC, in early 2024. Initiating a mind shift from a focus on the disability to a focus on the barrier will support the ACA efforts at the root and will establish a dynamic of shared responsibility on removal of barriers within the Department. In addition, we aim to delve into the concept of ableism, which has been raised as a barrier for PwD, related in particular to the employment and accommodation areas of interest. Our objective in 2024 is to gain a deeper understanding of this barrier, how it actualizes in IRCC, how it impacts both our clients and employees, and to identify potential solutions for the future.

The ACoE started collaborating with the Department's Enterprise Change Management team (ECM) in 2023. As a first step, for advice and support on integrating efficiently the "Accessibility" change at the enterprise level and to guide the leaders of IRCC to embody the change given their influence on the culture the organization. As a second step, the ECM team has provided support to plan a workshop in early 2024 to bring stakeholders together, including PwD, and to collaborate on the development of the Culture Change action plan.

The development of metrics and Key Performance Indicators will be important in this area to help establish a baseline and measure progress within the organisation.

Identify Accessibility as a Learning Departmental Priority

This year, the ACoE made a request to IRCC's Learning Academy to specifically identify "Accessibility" as a learning priority across the Department for the years 2023 to 2025. The Learning Academy is recommending in favor of this request. A final decision is pending from the senior management committee responsible for establishing learning priorities in the Department.

Learning working group

Learning is at the core of culture change as it helps increase knowledge on disability, accessibility and on ways to remove barriers. In IRCC's Accessibility plan, learning is an horizontal topic that is seen as a solution to remove barriers across all ACA areas of interest. Therefore, a working group on learning will be created in early 2024 to ensure coordination and streamlining of efforts. It will also help align future learning products with the requirements of the ACA.

Policy working group

Because the reference to policies, procedures, processes and tools has been identified as a horizontal and recurring topic across the ACA priority areas, the need to create a Policy working group in the coming years has been identified. This group will help to avoid duplication of efforts and structure, prioritize and plan the approach to policy reviews. This working group will be created in 2024.

The development of an Accessibility Framework in the coming years, applicable across the Department, would be a great added value for IRCC. With a mandate to consider accessibility during all decision-making processes, it would also be a formal support to culture change towards Accessibility.

5. Feedback

Accessibility feedback process

IRCC made its <u>accessibility feedback process</u> available online at the end of 2022, at the same time our accessibility plan was published. Anyone wishing to submit feedback on barriers to accessibility at IRCC, on the implementation of our accessibility plan, or on any matter related to accessibility at IRCC, may communicate with us through the following:

- Online: <u>Accessibility feedback form</u>
- Email: IRCC.Accessibility-Accessibilite.IRCC@cic.gc.ca
- Phone: 1-833-411-6166 or 613-437-6949
- Mail: c/o IRCC Accessibility Officer, 365 Laurier Ave West, Ottawa, ON K1A 1L1, Canada

The process also includes instructions to submit anonymous feedback.

The IRCC Accessibility Officer is responsible for receiving feedback on behalf of the Department. The Manager of the IRCC Accessibility Centre of Excellence (ACoE) currently occupies this role.

The ACoE holds the responsibility to ensure feedback received is processed as per Accessible Canada Regulations (ACR), and taken into consideration by the Department. To that end, we drafted internal procedures with detailed instructions, including on:

- retaining feedback (as per section 19 of the ACR)
- preparing and sending an acknowledgement of receipt (as per sub-section 9(4) of the ACR)
- taking action on feedback received
- tracking feedback and actions taken

In addition, the ACoE validated that the feedback process as described online was fully functional. We ensured a physical mailbox was created in our mailroom and that the telephone numbers and associated voicemail service were operational.

To enhance IRCC's feedback process, we reviewed our online feedback form, and made edits to address gaps in language to better reflect the range of visible and invisible disabilities in the workplace and to present an accessibility-positive tone. The updated version of the form was made available online on August 15, 2023.

Other means to receive feedback

Feedback may also be received at IRCC through other means than the ones listed above. Other means may include:

- Social media platforms such as Facebook or Instagram
- In-person in our client-facing offices or facilities where IRCC services are provided, or during events hosted by IRCC
- The IRCC Web form, which has a feedback option where anyone can submit a complaint/compliment/suggestion about our services, our programs or policies, our website or other

The ACoE has initiated discussions with relevant stakeholders to establish efficient processes by which our centralized accessibility team can be made aware of any feedback related to accessibility received through these other means. That way, the ACoE can make sure steps are taken to address the feedback as appropriate, collect data for reporting purposes, and ensure compliance with the ACA/Regulations.

Feedback received

From January to the end of October 2023, we received a total of 183 feedback submissions, through our online feedback form or dedicated accessibility email address.

Out of scope

More than 90% of all feedback received was not related to accessibility (168 of 183). It included case specific enquiries or general questions about immigration or asylum programs. When contact information is included, we provide a response to the person, directing them to existing client support channels and providing relevant links to IRCC's Help Centre, processing times or application status.

Accessibility Feedback

During that period, we received a total of 15 feedback submissions related to accessibility at IRCC. This represents less than 10% of all feedback received. The following was noted:

- 7 out of 15 (or close to half) were sent by IRCC employees
- 3 out of 15 were sent anonymously, by IRCC employees
- 11 were received by email, and 4 through our online feedback form
- Submissions highlighted barriers to accessibility related to information or communications (7), attitudinal barriers (3), technological barriers (3), physical barriers (2) and as a result of a policy/practice (1).
- All priority areas of our accessibility plan were represented in feedback received, except Procurement.



For all feedback received, the ACoE assesses the submission, identifies stakeholders concerned and engages them through email and/or meetings, discusses actions to be taken and challenges, as relevant, and tracks progress to completion. For example:

- External submission received highlighting information unavailable on our website, preventing people with mobility issues to adequately plan their visit to our client-facing facilities:
 - Our external communications and real property management divisions were engaged to discuss how barriers highlighted can be addressed.
 - ▷ Information related to IRCC offices is being gathered and will be reviewed for consistency prior to being considered for publication.
 - ▷ Progress is being tracked.
- Internal submission received on missing signage to indicate which way automatic door will
 open, to allow people with mobility aid to better position themselves:
 - Engaged our division responsible for real property management; involvement of other government department required.
 - Progress being tracked.
- Anonymous internal submission received indicating management lacks knowledge with respect to the duty to accommodate (DTA) leading to little flexibility to accommodate employees' needs.
 - ➤ This provides perspective into experiences of employees with disabilities related to the employment, accommodation and culture priority areas in IRCC.
 - ➤ This will assist in justifying recommendations related to learning needs for managers related to both DTA and shift in their management approach.

Considerations

Considering on one hand, the business IRCC conducts and its potential impact on residents in Canada regardless of status or people abroad seeking to come to Canada, and on the other hand, the size of our organization, with more than 13,000 employees, the number of accessibility feedback received is low. Thus, we were not able to identify any significant trends at this time. As accessibility gains momentum and we continue to build awareness and increase the visibility of IRCC accessibility initiatives across our department, including our obligations with respect to feedback, we expect the proportion of feedback received on accessibility to increase.

As we receive and process more accessibility feedback submissions, we will refine our approach, and as a result, ensure feedback received can help us not only to identify and remove barriers, but also in planning and priority-setting for the delivery of accessibility initiatives within IRCC.

6. Looking ahead to 2024

The inaugural year of implementing the IRCC Accessibility Plan is coming to a close. Throughout 2023, we embarked on a journey marked by the initiation and exploration of the accessibility landscape in our department, and a thorough understanding of the requirements outlined in the Accessible Canada Act and Regulations. This year, we dedicated ourselves to developing expertise and processes, creating essential tools, and fostering strategic partnerships. These foundational elements position us to embark on the second year with heightened confidence and a clearer sense of direction.

In the coming year, we will be focusing on the following priorities:

- Stabilizing resources dedicated to accessibility across the Department, to ensure compliance with the ACA and sustainability of efforts in the medium to long term.
- Structuring the collection and analysis of relevant data and metrics, and developing Key
 Performance Indicators for initiatives across all priority areas. This will allow to measure
 progress more effectively, assess if initiatives lead to real improvements for both clients and
 employees with disabilities, and build accountability.
- Addressing attitudinal barriers, as a condition for success in all priority areas, through the
 development of a culture change strategy and action plan for the Department.

Throughout 2023, we witnessed a gradual increase in interest surrounding accessibility within the Department, and we are encouraged by the discovery of new allies across IRCC. As we step into 2024, our department is fueled by motivation and determination to make substantial strides in removing barriers for persons with disabilities. Together, we look forward to advancing our commitment to accessibility and contributing to a more inclusive environment within IRCC.

7. Annex

Figure 1—Image description: The left side has the words "Persons with disabilities network" and "Réseau des personnes en situation de handicap." The image is a rainbow with 7 people with different disabilities standing on it. Of these, 3 people have visible disabilities, 3 have invisible disabilities, and 1, the woman with the support dog, has a visible and invisible disability. The colours of the rainbow are from the Disability Pride Flag. Each colour represents a different type of disability: physical (red), cognitive and intellectual (yellow), invisible and undiagnosed (white), sensory (green), and psychosocial/mental health (blue). The charcoal background symbolizes people with disabilities victimized by ableism.

Figure 2—Image description: The left side has the words: "Persons with disabilities network" and "Réseau des personnes en situation de handicap." The top right corner of the background has lines at a 45-degree angle in the Disability Pride Flag colours. Each colour represents a different type of disability: physical (red), cognitive and intellectual (yellow), invisible and undiagnosed (white), sensory (green), and psychosocial/mental health (blue). The charcoal background symbolizes people with disabilities victimized by ableism.