



RCMP External
Review Committee

Comité externe
d'examen de la GRC

RCMP External Review Committee

Accessibility Plan 2023-2025

Canada

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RCMP External Review Committee Accessibility Plan

Background

In July 2016, the Government of Canada (GC) began consultations with more than 6,000 Canadians in order to determine what an accessible Canada means to them. As a result of these consultations, Bill C-81: An Act to Ensure a Barrier-Free Canada, was tabled in June 2018. The [Accessible Canada Act](#), which aims to make Canada a barrier-free country by January 1, 2040, came into force in July 2019. In order to attain that goal, all GC organizations are required to proactively identify, remove and prevent barriers in the following seven (7) priority areas:

- employment
- the built environment (buildings and public spaces)
- information and communication technologies
- communication, other than information and communication technologies
- the procurement of goods, services and facilities
- the design and delivery of programs and services
- transportation (airlines, as well as rail, road and marine transportation providers that cross provincial or international borders)

According to the 2017 Canadian Survey on Disability, one in five Canadians (6.2 million) aged 15 years and over had one or more disabilities that limited them in their daily activities. Based on the data obtained with respect to employment equity in the public service of Canada for fiscal year 2017 to 2018, 5.3% of employees of the core public service identify as persons with disabilities. These figures indicate that the public service is having difficulty attracting and retaining persons with disabilities, despite the significant number of available candidates in the labour market. This report also shows that not only has the rate of promotion for employees with disabilities decreased over the last 10 years, but the percentage of new hires with disabilities has continued to fall below the workforce availability for this group. Moreover, results from the 2018 Public Service Employment Survey (PSES) suggest there is a significant difference in rates of harassment for employees who self-identify as having a disability (18% higher than those who do not self-identify). In light of all this, it is clearer than ever that the public service as a whole has some work to do to in terms of improving representation in the public service and ensuring that persons with disabilities can participate fully and meaningfully in the workplace.

The [Government of Canada's Accessibility Strategy](#) lays out a vision for becoming the most accessible and inclusive public service in the world.

The Strategy's guiding principles

- "Nothing without us" – persons with disabilities are involved in the design and implementation of the strategy
- Collaboration – GC organizations work in collaboration with each other, with bargaining agents and with other public, private and not-for-profit organizations

- Sustainability – the strategy prioritizes actions that will have an enduring impact
- Transparency – the strategy is developed and implemented transparently; and GC organizations will report openly and transparently on their efforts to remove barriers

The Strategy's goals

Five goals are key to realizing the vision:

1. Employment – Improve recruitment, retention and promotion of persons with disabilities
2. Built environment – Enhance accessibility
3. Technology – Make information and communications technology usable by all
4. Services – Equip public servants to design and deliver accessible programs and services
5. Culture – Build an accessibility-confident public service

In addition to the publication of GC organizations' first Accessibility Plan, the *Accessible Canada Act* has the following planning and reporting requirements:

- **Prepare and publish accessibility plans**
 - Develop accessibility plans to identify, remove and prevent barriers in the priority areas in their:
 - Policies
 - Programs
 - Practices
 - Services
 - Update organization plans every three years or as specified in regulations
 - Consult people with disabilities when creating and updating organization plans
- **Establish a feedback process**
 - Build internal capacity to receive and deal with feedback about accessibility within the organization
- **Prepare and publish progress reports**
 - Issue regular progress reports describing the actions the organization has taken to implement these accessibility plans, include the feedback received and how the organization took the feedback into consideration
 - Consult people with disabilities when preparing progress reports

These requirements help ensure that accessibility is an ongoing priority and that all GC organizations are continuously improving and implementing inclusive design and working towards an accessible by default end state. The responsibility/accountability for accessibility will no longer be placed on persons with a disability but rather with all functional groups within GC organizations. The GC will establish proactive mechanisms to address accessibility systemically, from the outset.

A. General

The RCMP External Review Committee (ERC) is an independent administrative tribunal that contributes to fair and equitable labour relations and helps to reinforce accountability at all levels within the Royal Canadian Mounted Police (RCMP). Other than the courts, the ERC is the only independent review mechanism available to RCMP members and management for serious labour relations matters. The ERC conducts impartial reviews of appeals of certain conduct decisions and measures imposed on RCMP members and of written decisions regarding harassment complaints filed prior to January 1st, 2021. It also reviews appeals of revocations of appointments, discharges, demotions and ordered stoppages of pay and allowances. Case files dealing with these matters are referred to the ERC for review by the RCMP pursuant to sections 33 and 45.15 of the [Royal Canadian Mounted Police Act](#) and section 17 of the [Royal Canadian Mounted Police Regulations](#).

The ERC is a small organization under the core public administration with 33 full-time employees.

Executive Summary

The ERC's Accessibility Plan was developed using the feedback from ERC employees received through surveys and discussions to gain feedback on various subject related accessibility.

The priority areas identified in the [Accessible Canada Act](#), listed above, were used as guides during the development of the ERC's Accessibility Plan. Based on these, the ERC has identified areas of improvement and ways to remove and prevent accessibility barriers in our workplace. These actions will have a positive impact on increasing a culture of inclusiveness at the ERC and positively impact the hiring and retention of persons with disabilities which will further enrich all ERC employees.

Accessibility Statement

The ERC is committed to creating a workplace that is accessible for all employees. The ERC will continue towards making accessibility the default in all plans and policies while updating all current approaches to meet this standard. This approach will enable the ERC to meet its overall goals and mandate while enriching the working environment for all ERC employees.

Feedback Mechanism

The *Accessible Canada Act* requires organizations to establish a departmental process for receiving and dealing with feedback regarding the implementation of the accessibility plan. The ERC will be regularly monitoring and evaluating feedback and ensuring that it is incorporated into its future plans when possible.

If you have any questions, feedback or suggestions, you can communicate with the ERC by:

- sending an email to the attention of the Director General of Corporate Services at corporateandhrservices-servicesgenerauxeth@erc-cee.gc.ca
- telephone: 613-998-2134
- sending your feedback by mail to:
RCMP External Review Committee
P.O. Box 1159, Station B
Ottawa ON, K1P 5R2

Alternate formats of this accessibility plan are available upon request. Please contact the ERC for information and support.

B. Priority Areas Identified by the *Accessible Canada Act*

1. Employment

The ERC as a small organization is dedicated to implementing government-wide initiatives and increasing representation of persons with disabilities across all occupational groups and levels. As such, the ERC is committed to removing and preventing barriers to recruitment, retention and the promotion of persons with disabilities. The ERC will be focusing on the following barriers to employment commonly identified across organizations:

- more awareness and engagement are required to become a more accessible workplace;
- managers may not understand how to support persons with disabilities;
- employees are often reluctant to self-identify disability.

The ERC will focus on the following actions in response to these barriers:

- Increase managers and employees awareness by adding related training to its mandatory training
- Promote events and tools
- Review staffing processes to ensure they are inclusive and accessible
- Continue to encourage hiring and promotion of persons with disabilities
- Promote the importance of self-identification
- Continue to promote a safe work environment where employees can express themselves openly

2. Built Environment

In 2019 the ERC redesigned its physical work site to be accessible by default and ensured that workstations are fully accessible using the inclusive by design method. As such, there are no identified barriers at this time which are under the ERC's responsibility. The ERC has:

- equipped all offices with ergonomic equipment
- created an occupational health and safety committee to ensure employee health and safety
- reviewed the emergency and evacuation plan
- continued open discussion at all staff meetings on diversity, inclusion and accessibility.

In addition to these, the ERC will:

- periodically review the physical work site to continue to meet the inclusive by design and the needs of employees
- continue to ensure that employees are aware of the emergency and evacuation procedures.

3. Information and Communication Technologies (ICT)

ERC employees have been working remotely since 2019 and full time since the onset of COVID-19 in March 2020. In the fall of 2021, the ERC adopted a hybrid workplace model with the flexibility to work from the physical office and remotely. With the Government of Canada's announcement of a mandatory Return to Office (RTO), the ERC has developed a plan for all employees to return to the physical office space. This plan ensures that all on-site offices will be equipped with all needed IT equipment, employees only needing to transport their laptops to and from the office. As employees will still be required to work remotely part-time it is the responsibility of the organization to provide employees with all equipment needed to successfully perform their duties at their remote work locations.

In order to be as accessible as possible the ERC will:

- continue to promote accessible technologies and software for its employees.
- consider accessibility and adaptability in all new software/hardware acquisitions.
- support operations in being able to provide Findings and Recommendations (F&R) reports in alternate formats, upon request
- provide access to assistive ICT as requested either through internal procurement or through the Government of Canada's assistive devices lending program.

4. Communications Other than ICT

The ERC is committed to ensuring that all communications are accessible. To this end, the ERC has migrated its website to the Canada.ca platform and has ensured that it adheres to all Government of Canada style guidelines, including its directive on producing communications using plain language. In order to maintain accessibility the ERC will continue to update communications and the ERC's website in compliance with Web Content Accessibility Guidelines (WCAG) updates and will ensure that its communications continue to meet all Government of Canada accessibility guidelines.

5. The Procurement of Goods and Services

The ERC understands the importance of timeliness in the procurement of adaptive equipment and providing an accessible environment. As such, the ERC is committed to continuing providing a rapid and simplified procurement process. Due to the ERC's size as a micro-organisation, it is able to quickly and efficiently action all procurement requests. It is also able to process, on a priority basis, any requests that are identified as meeting an adaptive or accessible need. The ERC will continue to review internal policies and mechanisms to ensure that the procurement process remains accessible and that requests are actioned in a timely manner.

6. The Design and Delivery of Programs and Services

The ERC is an administrative agency with the mandate of reviewing appeal cases relating to labour relations within the Royal Canadian Mounted Police (RCMP) and issuing Findings and Recommendations (F&Rs) and has only one ongoing program. Its mandate is to review grievances, discipline and discharge and demotion matters involving RCMP members and to provide Findings and Recommendations to the RCMP Commissioner.

The ERC's Corporate Services Directorate (Corporate) will:

- Consider accessibility in the development and implementation of all policies and practices
- Develop policies and practices using an accessibility foundation so services are accessible.

7. Transportation

This priority area under the *Accessible Canada Act* does not apply to the ERC.

C. Culture Change, Education and Awareness

The ERC is committed to creating an environment where persons with disabilities can be successful. In the process of creating this plan it was noted that many individuals do not feel comfortable self-identifying as a person with a disability. Many employees of the ERC do not have a complete understanding of what it means to be a person with a disability and how the culture or work environment can affect those who are living with a disability.

The ERC understands that the workplace culture will be a major factor in the comfort and willingness of employees to self-identify and discussing ways to ensure the workplace is barrier free. Education will be a key component in this culture change. As such, all employees are encouraged to take course INC115: Addressing Disability Inclusion and Barriers to Accessibility with the Canada School of Public Service. The ERC has also focused on creating a safe environment where all employees feel safe to share their lived experiences, thoughts and suggestions.

All ERC employees will be regularly consulted using confidential surveys to collect their feedback and suggestions and to ensure that progress towards an accessible by default

workplace is not stagnant. The ERC will be promoting the self-identification of all of its employees using the new self-identification questionnaire and it will raise awareness of the *Accessible Canada Act* with its employees through presentations, training sessions and informal discussions.

The ERC will constantly strive to improve upon its existing models and ensure that all of its employees experience a safe and accepting workplace free of discrimination and barriers.

D. Consultations

The Government of Canada's commitment to "Nothing without us" was imperative in the creation of this Plan. To truly ensure an inclusive barrier free environment, persons with disabilities will be involved in the review of this plan. Due to the ERC's size as a micro-organisation it was not possible to consult solely and specifically with employees who identified as persons with disabilities, as it would not be possible to ensure their confidentiality. Combined with the knowledge that there may be several employees of the ERC who are not comfortable self-identifying, all employees of ERC were consulted through anonymous surveys and discussions to gain their opinions regarding accessibility at the ERC. This internal consultation was beneficial in setting the table for future on-going discussions and consultations.

E. Implementation, Monitoring and Reporting

In accordance with the *Accessible Canada Act*, the ERC will prepare and publish annual progress reports on its Accessibility Plan. These reports will outline any feedback received and the actions taken (if any) to improve upon existing models. This annual report will ensure that accessibility remains in the forefront of the ERC's initiatives and will ensure constant attention and progress in meeting its goals. The ERC's first progress report will be published in June 2024. It is also specified that a revised plan must be published every three (3) years. In accordance with this regulation, the ERC will publish an updated Accessibility Plan in December 2025.

F. Glossary

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 an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation."

Disability

"means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment—or a functional limitation—whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society."

"Nothing without us"

"Nothing without us" is a guiding principle used across the Government of Canada to communicate the message that no policy should be decided by a representative without the full and direct participation of the members of the group affected by that policy.

Self-Identification Modernization Project

In September 2020, the Treasury Board Secretariat launched the Self-Identification (self-ID) Modernization Project to increase the accuracy, depth and breadth of the data across government. The project explored ways to reduce stigma associated with self-identification for all employment equity groups. Following extensive research and consultations, a new questionnaire was co-designed with employees from various diversity networks.

Government of Canada Workplace Accessibility Passport

The Government of Canada Workplace Accessibility Passport helps address the obstacles federal public service employees and applicants with disabilities face in obtaining the tools, supports and measures to perform at their best and succeed in the workplace. It facilitates recruitment, retention, and career advancement for persons with disabilities. The Accessibility Passport facilitates employee mobility between GC organizations. It is meant to follow each employee and it is an evergreen document that can be updated throughout a career.