



Military Grievances
External Review Committee

Accessibility Plan

MILITARY GRIEVANCES EXTERNAL REVIEW
COMMITTEE
DECEMBER 2022

Aussi disponible en français sous le titre : Plan sur l'accessibilité 2022-2025

Information contained in this publication or product may be reproduced, in part or in whole, and by any means, for personal or public non-commercial purposes without charge or further permission, unless otherwise specified. Commercial reproduction and distribution are prohibited except with written permission from the Military Grievances External Review Committee.

For more information, contact:

Military Grievances External Review Committee

60 Queen Street, 9th floor

Ottawa, Ontario K1P 5Y7

www.canada.ca/en/military-grievances-external-review.html

© His Majesty the King in Right of Canada, as represented by the Minister of National Defence, 2022

Catalogue no. DG2-13E-PDF

ISSN 2817-0431

Table of contents

Military Grievances External Review Committee Accessibility Plan	3
A. General	4
Executive summary.....	5
Accessibility statement	5
Feedback mechanism	5
B. Priority areas identified by the <i>Accessible Canada Act</i>	6
1. Employment.....	6
2. Built environment	6
3. Information and Communication Technologies.....	7
4. Communications other than ICT.....	7
5. The procurement of goods, services and facilities	7
6. The design and delivery of programs and services	8
7. Transportation	9
C. Culture change, education and awareness.....	9
D. Consultations	10
E. Implementation, monitoring and reporting.....	10
F. Glossary	11

Military Grievances External Review Committee Accessibility Plan

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 same 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 GC's [Accessibility Strategy for the Public Service of Canada](#)ⁱⁱ (the 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 Military Grievances External Review Committee (Committee) is an independent administrative tribunal. The Committee reviews military grievances referred to it, pursuant to section 29 of the *National Defence Act*, and provides findings and recommendations (F&R) to the Chief of the Defence Staff (CDS) and the Canadian Armed Forces (CAF) member who submitted the grievance.

The Committee is a micro-organization with 48 full time employees.

Executive summary

The Committee's first ever accessibility plan, developed by a working group of employees who self-identified as persons with a disability, is a direct reflection of the input, views and suggestions provided by employees across the organization. The following list of identified barriers is the outcome from our in-house survey and follow-up group discussion, and is what the Committee used to develop the plan:

- Lack of training and guidance for employees at all levels on accessibility, accommodation, inclusion and barriers faced by persons with disabilities
- Burden is placed on the employee to research possible solutions and accommodation for Information Technology (IT) equipment
- Timeliness in procuring adaptive equipment could be improved
- Lack of openness from managers to hire persons with disabilities
- Accessibility not apparently considered when new policies and practices are put in place
- Currently fixing problems as they are identified rather than starting from an expectation of accessible design
- Disabilities are still largely misunderstood and more awareness is required
- Culture change within the organization will be key
- Reluctance by some employees to self-identify their disability in MyGCHR

Based on the priority areas identified in the *Accessible Canada Act*, the Committee has determined several actions, listed below, to work towards the elimination and prevention of the barriers identified within the organization. These actions will have a direct impact on creating a culture of inclusiveness, putting the focus on accessibility at the Committee. Additionally, the Committee will measure and report on progress with respect to the implementation of these actions.

Accessibility statement

Accessibility is the lens through which the Committee's overall vision, values and priorities will be developed. The Committee's ultimate goal is to be a workplace that is accessible by default.

Feedback process

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 Committee is dedicated to continuous improvement and aims to deliver accessible services to our employees, collaborators and stakeholders. As such, the Committee will establish and promote clear channels for feedback and regularly monitor and evaluate that feedback, ensuring it is incorporated into our future plans, when possible.

If you have any questions, feedback or suggestions, contact the Committee by:

- sending an email to the Director of Human Resources at mgerc.hr-rh.ceegm@mgerc-ceegm.gc.caⁱⁱⁱ
- calling the Committee's public line at 613-996-8529 or 877-276-4193 (toll free)
- sending your feedback by mail to 60 Queen Street, 9th Floor, Ottawa, ON, K1P 5Y7
- submitting anonymous feedback through [our feedback form](#)

B. Priority areas identified by the *Accessible Canada Act*

1. Employment

The Committee is dedicated to implementing government-wide initiatives and increasing representation of persons with disabilities across all occupational groups and levels. As such, removing and preventing barriers to recruitment and retention, and the promotion of persons with disabilities are priorities. Internal consultations allowed us to identify two barriers to employment:

- lack of openness from managers to hire persons with disabilities
- reluctance to self-identify disability in MyGCHR

In order to break down these barriers and prevent it altogether, the Committee:

- will ensure that staffing and assessment tools are accessible and inclusive
- will increase awareness of accommodation and how to manage requests properly
- will prioritize and implement government-wide initiatives, including the Self-Identification Modernization Project and the Government of Canada Workplace Accessibility Passport (Accessibility Passport), to ensure the Committee has an accurate portrait of its employees
- will facilitate discussions between managers and employees with respect to accommodation
- will continue to encourage managers to hire employees with disabilities in support of the government-wide target of 7% (5,000 hires) by 2025
- will continue to promote flexible work arrangements to accommodate the needs of all employees (agreements are signed on a yearly basis)

Responsible: Human Resources Services

2. Built environment

The Committee recognizes the importance of an accessible built environment. As such, the Committee will continue to proactively encourage the mindset of “inclusive by design” and “accessible by default”. At present, the Committee:

- has already ensured that all offices are equipped with ergonomic equipment
- has already reviewed the emergency and evacuation plan
- has already reviewed storage facilities provided to each employee to make sure they satisfy their needs (size, allocation, etc.) prior to the return to the workplace following the Covid-19 pandemic

In addition to the actions already taken, the Committee:

- will promote the use of the inclusive design checklist for accessibility considerations (including safety, ergonomics and signage)
- will regularly review offices to ensure they meet accessibility requirements and employee needs
- will ensure that all employees are aware of the emergency and evacuation procedures to follow, including who to communicate with if they require additional support

Responsible: Procurement Services

3. Information and Communication Technologies

Since March 2020, Committee employees have been working from home on a full-time basis. With the return to work now officially underway and a new hybrid model being put in place, it is the Committee's priority to ensure that we have the capacity and the necessary capabilities to consider accessibility. Internal consultations allowed us to identify the following barriers to Information and Communication Technologies (ICT):

- A burden is placed on the employee to research possible solutions and accommodation for Information Technology (IT) equipment

In order to break down and prevent barriers in this area, the Committee:

- will look for internally developed or procured hardware/software, which meet modern accessibility standards, when considering new systems
- will look into adding closed captioning capability (CC) to meetings
- will support Operations in being able to provide F&R reports in alternate formats, upon request
- will provide all employees with the necessary training, resources and tools to create accessible content and generate accessible documents
- will update the 'Request a Network Account or Transfer' form to include a field regarding assistive and/or adaptive technology or service needs

Responsible: Manager, Information Technology and Information Management

4. Communications other than ICT

The Committee is dedicated to ensuring that all its communications, whether internal or external, are accessible. This includes ensuring that our communications are written in plain language, as per the GC's Canada.ca Content Style Guide.

In order to break down and prevent barriers in this area, the Committee:

- will promote accessible and inclusive communications practices in compliance with the latest Web Content Accessibility Guidelines (WCAG), the GC's [Standard on Web Accessibility](#)^{iv}, the [Standard on Web Interoperability](#)^v and the [Canada.ca Content Style Guide](#)^{vi}
- will review our website and intranet to ensure that they meet all GC-related accessibility guidelines

Responsible: Manager of Communications

5. The procurement of goods, services and facilities

Procurement is a key element in achieving accessibility at the Committee. As such, the Committee will implement procurement principles, rules and practices with the goal to advancing accessibility objectives. Internal consultations allowed us to identify the following barrier in this area:

- Timeliness in procuring adaptive equipment could be improved

In order to break down and prevent barriers in this area, the Committee:

- has already ensured that all offices are equipped with ergonomic equipment prior to the return to the workplace

In addition to this, the Committee:

- will add signage in the workplace in support of the scent free policy
- will use the inclusive design checklist for accessibility considerations (including safety, ergonomics and signage)
- will propose training for procurement officers to ensure accessibility is considered at the early stages of the procurement process
- will continue to track requests to ensure timeliness with respect to accommodation requests
- will continue to ensure that employees have access to ergonomic equipment, whether working from home or at the office
- will continue to assess offices to ensure they meet accessibility requirements and employee needs

Responsible: Procurement Services

6. The design and delivery of programs and services

As an organization that reviews grievances and provides F&R reports to the CDS and the CAF member who submitted the grievance, the Committee must consider accessibility in the delivery of the F&R reports. A fundamental aspect in achieving this will be feedback received from the CDS and the grievors.

The Corporate Services Directorate is responsible for the development and implementation of internal programs and services.

A. Corporate Services

Internal consultations allowed us to identify the following barriers in this area:

- Accessibility is not apparently considered when new policies and practices are put in place
- Currently fixing problems as they are identified rather than starting from an expectation of accessible design

In order to break down and prevent barriers in this area, the Committee:

- will ensure that proposals for new internal programs and services have applied accessibility considerations in their design
- will review internal policies, practices and rules with the goal of eliminating barriers and supporting disability inclusion, including improving processes for accommodation and procurement
- will build in accessibility from the start by:
 - presenting documents in accessible formats
 - understanding the needs of persons who use adaptive technologies
- will iterate and improve frequently
- will work openly while being cognisant of security and privacy risks

Responsible: Corporate Services Directors/Managers

B. Operations

Internal consultations allowed us to identify the following barrier in this area:

- The Committee does not proactively identify the accessibility requirements of grievors at the beginning of the grievance review

In order to break down and prevent barriers in this area, the Committee:

- will slightly modify the Initial Contact template so that the grievor can advise the Grievance Officer's of any accessibility requirements
 - work with Human Resources (HR) and the Champion of employment equity, diversity and inclusion for the appropriate wording
- will look into options for providing grievors with alternate formats of the F&R report, upon request
 - while the Committee will respond to all the grievor's accessibility requirements, we must provide F&R's in writing to the CDS as per the *National Defence Act*

Responsible: Senior Management within Operations

7. Transportation

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

C. Culture change, education and awareness

Culture change is at the heart of building an accessible and inclusive Committee. Internal consultations highlighted the following barriers:

- Disabilities are still largely misunderstood and more awareness is required
- Culture change within the organization will be key
- Several employees are reluctant to self-identify their disability in MyGCHR

As such, the Committee is dedicated to:

- building accessibility awareness and confidence within the organization by adding the following course to the Committee's mandatory training for all employees: [Addressing Disability Inclusion and Barriers to Accessibility](#)^{vii} (Product code: INC115)
- implementing the Accessibility Passport as a communications tool for employees and managers to exchange accommodation-related information and adopt a “yes by default” approach to accommodation
- consulting persons with disabilities to create a culture of constant improvement
- promoting self-identification in MyGCHR to ensure that representation within the Committee is accurately portrayed
- raising awareness about the goals of the *Accessible Canada Act* — including the realization of a barrier-free Canada, culture change and standards development — and monitor and report internally through blog posts and special learning events

Responsible: Human Resources Services

D. Consultations

One of the guiding principles of the GC's Strategy is the statement "*Nothing without us*", which affirms that persons with disabilities must be involved in the design and implementation of each accessibility plan at every stage. Persons with disabilities offer a unique and valuable perspective and the Committee's goal is to ensure that we do not have any barriers that prevent their full participation in the workplace. In order to identify barriers, the Committee consulted internally with persons with disabilities to get their perspectives, views and experiences as to the current state of accessibility at the Committee.

The first step was to conduct an in-house survey. The survey was composed of thirty-eight (38) questions and had six (6) sections: general questions; employment; ICT; built environment; culture change, education and awareness; and self-identification. The survey was anonymous and participation was optional. It was conducted online with the option to respond in alternate formats if requested. Before sending out the survey, two blog posts were published on the Intranet (internal website) to familiarize employees with the *Accessible Canada Act* and key definitions that provided better context for the term "disability."

The survey was a success with a 90% response rate. The Committee was able to collect significant feedback on the current state of accessibility at the Committee and suggestions on ways to prevent and eliminate barriers.

The plan, prepared by a working group of employees who self-identified as persons with a disability, is based directly on these survey results. The Committee wanted to ensure that our first ever accessibility plan was developed through the voices of persons with disabilities.

E. Implementation, monitoring and reporting

In order to ensure that accessibility remains a constant priority within the government, the *Accessible Canada Act* dictates that regulated entities prepare and publish annual progress reports on the implementation of their accessibility plans. These progress reports must be prepared in consultation with persons with disabilities and present the feedback received (if any) and how that feedback was taken into consideration.

The Committee's first progress report will be published in June 2024, eighteen (18) months after the publication of our first accessibility plan. It will include updates on the actions the Committee has taken and include employee experience. Follow up surveys, with specific questions that touch on accessibility, will permit the Committee to fully gauge reaction to the implementation of the plan.

As specified in the regulations, GC organizations must publish a revised plan every three (3) years. As such, the Committee's first revised accessibility plan will be published 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.

Endnotes

ⁱ Military Grievances External Review Committee website, [Military Grievances External Review Committee - Canada.ca](#)

ⁱⁱ Accessibility Strategy for the Public Service of Canada, [Accessibility Strategy for the Public Service of Canada - Canada.ca](#)

ⁱⁱⁱ Director of Human Resources at the Committee, at mgerc.hr-rh.ceegm@mgerc-ceegm.gc.ca

^{iv} Government of Canada Standard on Web Accessibility, [Standard on Web Accessibility](#)

^v Government of Canada Standard on Web Interoperability, [Standard on Web Interoperability](#)

^{vi} Government of Canada, Canada.ca Content Style Guide, [Canada.ca Content Style Guide](#)

^{vii} Canada School of the Public Service, [Addressing Disability Inclusion and Barriers to Accessibility](#)