



Office of
the Intelligence
Commissioner

Bureau du
commissaire
au renseignement

ACCESSIBILITY PLAN

DECEMBER 2022

Office of the Intelligence Commissioner (ICO)

© His Majesty the King in Right of Canada as represented by the
Office of the Intelligence Commissioner, 2022.

Catalogue No. D95-14E (D95-14E-PDF)
ISSN 2817-0350

TABLE OF CONTENTS

Contents

General	1
General	1
Feedback Contact	1
Executive Summary	2
Accessibility Statement	2
Areas Described under Section 5 of ACA	3
Employment	3
Barriers	3
Actions	3
Timelines	3
Built environment	5
Barriers	5
Actions	5
Timelines	6
Information and communications Technology (ICT)	7
Accessibility on the Web	7
IT accommodations for employees	7
Barriers	7
Actions	7
Timelines	7
Communications other than ICT	8
Barriers	8
Actions	8
Timelines	8
Procurement of goods, services and facilities	9
Actions	9
Timelines	9
Design and delivery of programs and services	9
Transportation	9
Consultations	10
Glossary	11

ACCESSIBILITY PLAN

General

GENERAL

The *Accessible Canada Act* (ACA) came into force in 2019 with the goal of making Canada barrier-free by 2040. As defined in the ACA, a barrier is anything that prevents persons with disabilities from fully participating in society.

One of the ACA requirements is that organizations under federal responsibility identify barriers, develop and implement actions to remove barriers to accessibility in 7 seven priority areas:

- employment
- the built environment
- information and communication technologies (ICT)
- communication other than ICT
- the design and delivery of programs and services
- the procurement of goods, services and facilities
- transportation

In addition, organizations under federal responsibility must prepare and publish accessibility plans, implement a feedback process on accessibility and publish a progress report on their accessibility plan annually.

The Office of the Intelligence Commissioner (ICO) has a designated feedback contact and process to accept feedback regarding accessibility and this action plan. Feedback can be send to via various channels, including email, phone and mail. Individuals can submit anonymous feedback via the online form on the ICO website. The ICO will acknowledge all accessibility feedback received with the exception of anonymous feedback.

FEEDBACK CONTACT

Executive Director

P.O. Box 1474, Station B

Ottawa, Ontario K1P 5P6

613-992-3044

Info@ico-bcr.gc.ca

<https://www.canada.ca/en/intelligence-commissioner.html>

ACCESSIBILITY PLAN

EXECUTIVE SUMMARY

In July 2019, An Act respecting national security matters (known as the *National Security Act, 2017*) came into force and reshaped Canada's national security and intelligence accountability framework. This included a novel oversight function through the appointment of an Intelligence Commissioner, a unique quasi-judicial function in Canada, set out in the *Intelligence Commissioner Act*. The Intelligence Commissioner is responsible for performing quasi-judicial reviews of the conclusions on the basis of which certain authorizations are issued or determinations are made under the *Communications Security Establishment Act* and the *Canadian Security Intelligence Service Act*.

Given the specific mandate, the ICO does not provide programs and services to the public. The ICO accessibility stakeholders are its employees. The ICO is a micro agency with less than 10 employees. Given the size of the organization, the ICO also consulted with other organizations to help identify potential barriers and develop actions plan to eliminate them.

ACCESSIBILITY STATEMENT

The ICO is committed to creating a workplace that ensures equal access and participation of people with disabilities. The ICO is committed to treating everyone with respect and to ensure that people with disabilities are treated in a way that allows them to maintain their dignity and independence.

The ICO is also committed to meeting the needs of people with disabilities in a timely manner, by removing and preventing barriers to accessibility and by meeting the accessibility requirements under the *Accessible Canada Act*.

This Accessibility Plan demonstrates the commitment to creating a barrier-free environment for everyone. The plan includes concrete actions to implement strategies to break down the barriers, communicate progress and foster a culture of inclusion.

The ICO will monitor the implementation of the plan on an ongoing basis and communicate progress in the annual progress reports.

ACCESSIBILITY PLAN

Areas Described under Section 5 of ACA

EMPLOYMENT

The ICO is committed to consult employees and seek their involvement in improving their workplace to be more inclusive and barrier free.

Barriers

The ICO is a micro agency with less than 10 employees and therefore, it could be difficult for an employee with a non-visible disability to come forward and speak about the barriers and challenges they are facing. It is therefore important to foster an environment where employees feel comfortable while respecting their privacy and implement various ways for an employee to communicate their thoughts and concerns regarding accessibility.

Therefore, the ICO's action plan is based on consultations conducted by other departments and compliments its findings. Employees shared their experiences about the accommodation processes. Some employees with disabilities reported feeling well supported through existing accommodations processes, including experiencing understanding and empathy from management. Other employees with disabilities shared opportunities to enhance the accommodation processes, including timeliness and communication before, during and after the process.

As a separate Agency, the ICO is responsible for its own recruiting and hiring processes. The ICO has already started to look at resources and publications regarding adaptations for current and future employees. The ICO is building a list of contacts and publications to access should any new requirements be needed such as accommodation for candidate with special testing needs.

Actions

As an employer, it is important to improve awareness regarding accessibility and understanding of the barriers and challenges people with disabilities are facing. Fostering and increasing the dialogue and education regarding disability inclusion is also a priority for the ICO.

The ICO is committed to ensuring that all managers and supervisors take the applicable training offered by the Canada School of Public Service on disability and inclusion and promoting the training to all employees.

Timelines

2023

- Continue to work with other departments to identify accessibility barriers and available solutions, raising awareness about disability inclusion, and implementing initiatives to foster a more inclusive working environment for Persons with Disabilities.

ACCESSIBILITY PLAN

- Increasing awareness about accessibility and promoting education and support a positive change of attitude.
- Establish a forum for employees to have a confidential discussion with their manager (workplace passport or equivalent).
- Collect employee self-identification data to evaluate the effectiveness of strategies and initiatives.
- Create an accommodations processes and accommodations budget to cover costs for varying employee accommodation requests.
- Have regular communication or news bulletins about Accessibility within the ICO.

2024

- Implement the Government of Canada's Workplace Accessibility Passport. The Government of Canada Workplace Accessibility Passport helps address the obstacles federal public service employees with disabilities face in obtaining the tools, supports and measures required to perform at their best and succeed in the workplace.
- Perform an accessibility and disability inclusion learning needs assessment to identify learning needs and explore available training resources.
- Research new talent strategies to hire, develop and retain more persons with disabilities.

2025

- Review the onboarding process with a pan-disability lens (e.g., ensure onboarding process and resources are inclusive of employees with other invisible disabilities).

ACCESSIBILITY PLAN

BUILT ENVIRONMENT

The ICO is committed to improve accessibility of the built environment and has already taken steps to towards this goal. This year, employees were provided with adjustable desks and incorporated accessible features where possible when undertaking new fit-up projects.

The ICO is located within a privately owned building that house many federal government entities. A private company ensures maintenance of the building but because the majority of tenants are federal government, the building must meet the accessibility standard of the Government of Canada. All entrances, elevators, restrooms, emergency exits, wayfinding and signage are under their jurisdictions.

The ICO does not provide any programs nor service to the public and therefore does not have nor requires public access counter.

Barriers

As the ICO does not have the pool of employees to create a significant and accurate picture of what employees with disabilities are facing at work, the results of other departments' consultations process were used to help identify potential barriers. Employee consultations highlighted positive feedback featuring their built environment but many self-identified employees reported challenges accessing accessible public parking, washrooms, and washroom elements, moving through doorways that lack electronic buttons, gaining access to buildings (key card/code entry), using signage and wayfinding (entrances, workspaces, and elevators).

Some employees also shared opportunities for the built environment to be improved to better support neurodiverse employees, for example through sensory-friendly workspaces and designated areas with adjusted lighting and limited distractions.

The ICO workplace is a highly classified environment and access is completely controlled and monitored. The ICO must respect specific rules in order to keep its designation. For example, no mobile devices are allowed within the workplace.

Actions

The ICO is currently looking to conduct an evaluation of our physical space and make accessibility recommendations. Discussions are underway with the Communications Security Establishment regarding the security requirements with a view of finding solutions to continue to be compliant with legislated security requirements and being accessible to all employees.

ACCESSIBILITY PLAN

Timelines

2023

- Work with partners to evaluate and improve our built environment to allow for access and inclusion of people with physical disabilities in the workplace.
- Consult/seek feedback from persons with disabilities before making modifications or new additions to the built environment.

2024

- Implement accessibility modification identified during the evaluation of the ICO workplace.
- Create an accommodations process for varying employee accommodation requests.

2025

- Review emergency and evacuation plans for accessibility and include alternative supports for employees or visitors with disabilities. Evaluate the experience of persons with disabilities during practice drills.

ACCESSIBILITY PLAN

INFORMATION AND COMMUNICATIONS TECHNOLOGY (ICT)

Accessibility on the Web

The ICO relies on Service Canada as the authority regarding the Government of Canada's Standard on Web Accessibility for all @canada.ca websites. The Government of Canada has adopted the WGAC 2.0 that was developed by the World Wide Web Consortium (W3C) to make sure the web content is accessible to people with disabilities. The ICO does not have an internal website (Intranet) for its employees.

IT accommodations for employees

The ICO has a Memorandum of Understanding with PCO for delivery of IT services. The ICO is committed to provide employees access to information and communication technologies to support performance in their roles based on individualized needs and in a timely manner.

Barriers

Since the ICO does not provide services to the public, the ICO does not currently provide communication supports to people with disabilities on the public-facing website. Most of the documents published on the ICO website are available in pdf or HTML format. Documents are available in a variety of accessible formats, by request, such as print and large text. Internal documents have not been evaluated yet to determine if they are accessible to employees with disabilities.

Actions

The ICO is committed to building an accessible digital environment to provide a barrier-free experience for the employees and on the web. The ICO recognizes an opportunity to develop a structured electronic file system to include information about the format of the document such as titles, section headings, font size and colours. This would make it easier to produce the same document in an alternate accessible format.

Timelines

2023

- Enhance accessibility and inclusion of the ICO documents by including alternate text for photos and the use of inclusive language in communications on the ICO website.
- Increase accessibility in communications with employees by including alternate text for all photos and plain text language in all communications as a standard practice.
- Consult with IT service providers regarding the accessible technologies available for as and when required.

ACCESSIBILITY PLAN

2024

- Look at alternate format options to provide accessible documents and communications.
- Develop a list of accessible IT solutions for persons with disabilities.

2025

- Develop and implement a structured electronic file system to easily share documents in a variety of accessible formats.

COMMUNICATIONS OTHER THAN ICT

Alternate communication formats of communications with our employees such as interpreters, translations, transcriptions in plain text, print copies are available upon request.

Barriers

The ICO need to develop relationships with a broader range of alternate communication format providers to provide timely access when needed. The ICO phones are not accessible for people with different types of disabilities and the use of video relay services (VRS) for internal meetings is not permitted in the workplace.

Actions

The ICO will be looking at the feasibility of adding alternate formats such as braille, MP3 (audio), e-text and DAISY formats to be available on demand. The ICO continues to provide interpreters, translations, transcriptions, and materials in advance/during departmental events, when applicable.

Timelines

2023

- Increase employee awareness of accessibility standards to foster a culture of accessibility and disability inclusion.
- Provide and communicate toolkit to support plain language writing.

2024

- Develop and implement clear accessibility best practices for inclusive communication in both official languages meetings (both in-person and virtual), including establishing processes to understand accommodations needs in advance to events/meetings (where applicable).
- Create a checklist to support employees in ensuring all accessibility standards have been met.

ACCESSIBILITY PLAN

2025

- Provide guidance for employees to better understand communication techniques for various disabilities and incorporate inclusive practices during meetings and events (i.e., send accessible materials in advance, describe speakers during introductions, provide transcripts, etc.).

PROCUREMENT OF GOODS, SERVICES AND FACILITIES

The ICO will relies on Public Services and Procurement Canada (PSPC) as the Government of Canada's common service provider for the procurement of goods, services and facilities for major projects.

Actions

The ICO will review the templates, forms, documents, and other communications used in the procurement process to ensure accessibility and communication of the department's accommodations processes, including leading practices for communicating with persons with disabilities.

Timelines

2023

- Review procurement process, including documents, forms, templates, and communications to ensure accessible practices are reflected.

2024

- Provide accessibility guidance to employees task with procurement duties procurement team on leading practices for accessible procurement and interacting/communicating with suppliers with disabilities.

DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

The ICO does not provide programs or services directly to the public.

TRANSPORTATION

The ICO does not provide transportation to the public.

Consultations

The ICO is a micro agency and as such needed to consult a wider audience to obtain substantive findings to identify barriers faced by persons with disabilities and creating a barrier-free environment for the future. The ICO consulted with other departments to assist in meeting the requirements of the *Accessible Canada Act*. For example, the ICO leveraged the expertise of other departments such as the Privy Council Office (PCO), Public Services and Procurement Canada (PSPC) and Services Canada. The ICO benefited from the work performed and guidance from those departments in the development of the accessibility plan to seek input on any known barriers and understand actions being taken by each of the respective organizations so that ICO could develop comprehensive action plan.

The ICO falls under the Prime Minister's portfolio and therefore consulted with the Privy Council Office (PCO) to elaborate this action plan. For example, PCO shared the findings of their anonymous and significant consultations with their employees and focus groups with the persons with disabilities community. The consultations lead to the identification of barriers, gaps and actions to eliminate barriers relating to employment, built environment, information and technology and communications. The consultations findings obtained allowed the ICO to elaborate an action plan that better represents the reality of the barriers people with disabilities are facing. The ICO was able to develop a concrete action plan, which includes barriers identified, and lived experiences shared by employees with disabilities and be prepared for future requirements.

The ICO will continue to work with other departments to actively seek feedback from the persons with disability community to ensure that our plan reflects the desired impact and results for those it is intended to support.

ACCESSIBILITY PLAN

Glossary

Accessibility

The degree to which a product, service, program or environment can be assessed or used by all.

Accessibility Passport

The GC 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.

Accommodation

Any change in the work environment that allows a person with functional limitations to do their job.

Accommodations can be temporary, periodic or long-term, including:

- adjusting the physical workspace
- adapting the equipment or tools
- working flexible hours or job-sharing
- moving the workspace
- working from home
- removing or changing some non-essential tasks for others
- time off for medical appointments

Barrier

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

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.

Disability type

A form of limitation, be it physical, mental, intellectual, cognitive, learning, communication or sensory or other. In its 2017 Canadian Survey on Disability, Statistics Canada used screening questions to identify the following 10 types of disability:

- seeing
- hearing
- mobility
- flexibility
- dexterity

ACCESSIBILITY PLAN

- pain-related
- learning
- developmental
- mental health-related
- memory

The screening questionnaire also contained a question concerning any other health problem or condition that has lasted or is expected to last for six months or more. This question was meant to be a catchall in case the 10 disability types did not cover the respondent's situation. This question is associated with an 11th "unknown" disability type.

Employee

A person employed in the public service.

Inclusion

The act of including someone or something as part of a group. An inclusive workplace is fair, equitable, supportive, welcoming and respectful. Inclusion recognizes values and leverages differences in identities, abilities, backgrounds, cultures, skills, experiences and perspectives that support and reinforce Canada's evolving human rights framework. (Source: Building a Diverse and Inclusive Public Service: Final Report of the Joint Union/Management Task Force on Diversity and Inclusion) Person with disabilities.

Persons with disabilities

Persons who have a long-term or recurring physical, mental, sensory, psychiatric or learning impairment and who a) consider themselves to be disadvantaged in employment by reason of that impairment, or b) believe that an employer or potential employer is likely to consider them to be disadvantaged in employment by reason of that impairment. Persons with disabilities include persons whose functional limitations owing to their impairment have been accommodated in their current job or workplace. (Source: Employment Equity Act)

Self-declaration

Applicants voluntarily providing information in appointment processes for statistical purposes related to appointments and, in the case of processes that target employment equity groups, to determine eligibility. (Source: Employment Equity in the Public Service of Canada for Fiscal Year 2017 to 2018)

Self-identification

Employees providing employment equity information for statistical purposes in analyzing and monitoring the progress of employment equity groups in the federal public service and for reporting on workforce representation. (Source: Employment Equity in the Public Service of Canada for Fiscal Year 2017 to 2018)