2024 Accessibility Progress Report

December 2024

Parole Board of Canada





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1 Introduction

The Parole Board of Canada (PBC or the Board) is committed to making meaningful changes to ensure our organization is barrier-free and inclusive to all, while fulfilling our mandate.

The PBC is pleased to present our 2024 Progress Report regarding our 2023-2025

Accessibility Plan (the Plan), which was published in December 2022. The Plan covered the Board's commitments to identify, remove and prevent accessibility barriers in the following priority areas listed in the *Accessible Canada Act* (ACA):

- employment;
- the design and delivery of programs and services;
- the built environment:
- communication, other than information and communication technologies;
- information and communication technologies;
- transportation; and
- the procurement of goods, services and facilities.

The Plan includes 41 actions that we intend to complete by the end of 2025 to increase accessibility for the public, victims, offenders, employees, and Board members.

Progress updates: This report focuses on 25 actions from our Plan, including those with initial deadlines in 2024, those carried over from 2023, as well as some without a fixed deadline (i.e., "ongoing").

The status of each action is outlined in Section 3: <u>Areas Described under Section 5 of the Accessible Canada Act</u>. The "in progress" status indicates measures that will be completed according to their deadline, while the "ongoing" status means the measure is longer-term and will continue to evolve over time, possibly beyond the timeframe set in the Plan.

While we have accomplished many of our actions for 2023 and 2024, some deadlines were adjusted based on factors such as resource availability, funding, or complexity. As we move forward, we will monitor the progress and adjust the work plans and timelines as required.

Reporting period: This 2024 Progress Report covers the period from November 1, 2023, to October 31, 2024.

Highlights of actions we have completed during this reporting period include the:

- Creation of a directive to ensure surveys and questionnaires include questions on accessibility.
- Review of the PBC workplace accommodation process.
- Promotion of a new process for individuals with diverse backgrounds, including individuals with disabilities, to participate in selection boards for employee staffing processes.
- Review of processes for requesting and receiving accommodations for people
 who interact with the PBC in relation to conditional release and record
 suspensions/pardons programs, including recommendations for addressing
 barriers.
- Review of PBC practices on communicating with offenders' assistants.
- Communication of building evacuation plans to all employees and Board members, including a process for employees and Board members to request individualized emergency plans.
- Creation of a process to request alternate formats of publications on the PBC website.

Management and Oversight: An Accessibility Steering Committee (Steering Committee) was established in early 2023 to ensure the PBC meets its commitments to the ACA and the *Accessible Canada Regulations*, which aim to make Canada barrier-free by January 1, 2040. The Steering Committee's mandate is to oversee the

implementation of the current Accessibility Plan, track progress, oversee consultations with persons with disabilities, and coordinate the preparation of annual progress reports and future versions of the Plan.

The Steering Committee is led by the Accessibility Champion, the PBC's senior level executive ambassador for accessibility initiatives. The Champion provides support and guidance to the Steering Committee from a strategic level and builds awareness of and advances accessibility issues within the organization. The Steering Committee includes representatives from across divisions as well as a member of the PBC's Network for Persons with Disabilities (see Section 4.1 for more information). Each representative is responsible for ensuring their division is working on its accessibility actions and reporting progress to the Steering Committee.

The Accessibility Champion provides updates about organizational accessibility at Executive Committee meetings.

2 General

2.1 Contact Information & Feedback Process

To capture and respond to accessibility feedback, the PBC established a feedback process in December 2022.

We welcome feedback from employees and Board members, government and community partners, offenders and the public about our Accessibility Plan and barriers experienced when interacting with the Board. Feedback helps identify, address, remove and prevent barriers in the Board's policies, programs, practices, services and physical spaces.



Feedback received is reviewed and responded to, as appropriate, and incorporated into the PBC's annual Progress Reports.

Submitting Feedback

Our Designated Official for Accessibility, responsible for receiving feedback and enquiries about accessibility is the Senior Advisor, Values, Integrity and Disclosure. Feedback about accessibility barriers at the PBC or about the implementation of the Plan, as well as requests for alternative formats of the Plan, this Progress Report or the feedback process, can be sent to the Designated Official for Accessibility through any of the various methods listed below. People providing feedback have the choice to do so anonymously.

Online Form: You may use the feedback form on the <u>Contact the PBC</u> webpage.

Email address: Accessibility.Accessibilite@pbc-clcc.gc.ca

Phone number: 1-833-541-3063 (toll-free)

Teletypewriter (TTY): 613-954-7771

Mailing address:

Designated Official for Accessibility
Parole Board of Canada
410 Laurier Avenue West, 6th floor mailroom
Ottawa ON K1A 0R1

Alternative Formats

Alternative formats of this Progress Report and a description of our feedback process are available by contacting the PBC Designated Official for Accessibility as follows:

Email address: Accessibility.Accessibilite@pbc-clcc.gc.ca



Phone number: 1-833-541-3063 (toll-free)

Teletypewriter (TTY): 613-954-7771

Mailing address:

Designated Official for Accessibility
Parole Board of Canada
410 Laurier Avenue West, 6th floor mailroom
Ottawa, ON K1A 0R1

The following alternative formats are available upon request and the PBC will strive to provide them within 15 days of the initial request:

- Print;
- Large print (18 pt).

The following alternative formats are available upon request, and the PBC will strive to provide them within 45 days of the initial request:

- Braille;
- Audio (a recording of someone reading the text out loud).

3 Areas Described under Section 5 of the Accessible Canada Act (ACA)

This section describes the progress the PBC has made on the 2024 actions for each of the priority areas in the PBC 2023-2025 Accessibility Plan. This also includes actions we originally expected to complete in 2023 but were still in progress when the 2023 Progress Report was published.

3.1 Organization Wide Initiatives

Barrier: There is no ongoing method of consulting people with disabilities.



Action: Future surveys and questionnaires seeking feedback about the PBC will include questions on accessibility.

Progress update:

- The PBC developed a Directive on Incorporating Accessibility Questions into Parole Board of Canada Surveys. This Directive outlines the requirements for PBC regions and divisions to:
 - o include accessibility questions in surveys and questionnaires;
 - o analyze the information collected;
 - report the information to the Accessibility Steering Committee to include in Accessibility Plans and Annual Progress Reports;
 - consider accessibility in PBC's policies, programs, and services based on the information collected.
- The PBC also created a tool to support the Directive which provides guidance to staff developing surveys and includes important factors to consider, as well as sample questions.

Status: Complete

Original Deadline: December 2023
Revised Deadline: December 2024

Action: The PBC will establish an external Accessibility Advisory Committee as a commitment to consult with persons with disabilities.

Progress update:

- The PBC is working on a plan to recruit 10-12 external Accessibility Advisors to form an External Accessibility Consultation Group for the Board.
- This Group will include individuals or members from diverse organisations who
 interacts with the Board and who will provide the PBC with valuable insights on
 accessibility issues from the perspective of persons with disabilities in the context
 of the PBC's mandate.
- Currently, the PBC is identifying the necessary qualifications and assessing recruitment strategies for Advisors who can provide meaningful feedback on



accessibility barriers and how to address them. The plan will be reviewed and approved by senior management before funding is secured.

Status: In progress

Original Deadline: December 2023
Revised Deadline: December 2025

3.2 Employment

Barrier: The process of requesting and receiving accommodations for employees is unclear, long and requires many levels of approvals.

Action: The PBC will complete a review of its workplace accommodation process in consultation with employees and Board members with disabilities, including an examination of barriers and challenges as well as ways to simplify the process.

Progress update:

- The PBC completed the review of its workplace accommodation process in the spring of 2024. Consultations were held with various stakeholders, including the Network for Persons with Disabilities.
- Examples of findings from this review:
 - Managers don't always know what to ask an employee who comes to them with a specific issue or barrier.
 - Employees who request accommodation measures often feel like they're put in an awkward situation or made to feel uncomfortable.
 - Employees feel that navigating complex processes can be dehumanizing.
- The PBC developed a summary report of the findings. The next steps will be to
 identify key stakeholders and develop guidance to help managers fulfil their
 responsibilities under the *Directive on the Duty to Accommodate*. This guidance
 will cover various types of accommodation requests, including those related to
 accessibility and ergonomic needs.

Status: Complete

Original Deadline: December 2023
Revised Deadline: December 2024



Action: Centralize funding for workplace accommodation requests.

Progress update:

- Before setting up a centralized fund, the PBC plans to track all spending related
 to accommodation requests during the 2024-2025 fiscal year. New financial
 codes have been created to help monitor these accommodation expenses for
 employees and individuals using PBC programs or services. This data will allow
 the PBC to determine the amount required for the centralized fund.
- In the meantime, managers are responsible for handling accommodation requests according to the *Directive on the Duty to Accommodate*. This means they need to plan and manage their budgets properly, using either their individual budgets or the overall organisational budget as needed.

Status: In progress

Original Deadline: December 2024
Revised Deadline: December 2025

Action: Implement the use of GC Workplace Accessibility Passports

Progress update:

- The PBC is committed to implementing an organization-wide process for the use
 of the GC Passport, which is a tool to facilitate discussions between employees
 and managers about employee accommodation needs.
- In the planning phase, the Board identified the unit responsible for the launch of the GC Passport, and staff in this unit have attended training and information sessions to better support the launch.
- The PBC determined that the internal rollout of the GC Passport requires the completion of several actions which are currently in progress, including:
 - The implementation of a new, simplified internal accommodations process, including guidelines and a process clarifying the roles and responsibilities of different units (e.g., Human Resources, Procurement, Finance), employees, and managers.

- The development of a training plan to help managers respond to accommodations requests, including those received via the GC Passport.
- The approval of a communications plan to promote the GC Passport and how to use it.
- Until the GC Passport is rolled out, advice and guidance are provided to managers and employees about the GC Passport on a case-by-case basis.

Status: In progress

Original Deadline: December 2024
Revised Deadline: December 2025

Action: Ensure that all staff and Board members with supervisory duties receive ongoing training on workplace accommodation and the legal duty to accommodate employees and Board members.

Progress update:

- As we create an accommodations process, we are identifying training needs and will consult with partners to find relevant existing training for supervisors and managers. By finalizing the accommodations process and creating guidance documents first, we will ensure that the training aligns with the new processes and tools.
- Additionally, the Treasury Board Secretariat's new *Direction on prescribed presence in the workplace* which came into effect in September 2024 resulted in
 an increase in accommodations requests. To address this, the PBC has
 implemented a process for managing these requests and is offering tailored
 coaching for managers.

Status: In progress

Original Deadline: December 2024
Revised Deadline: December 2025

Barrier: Employment Equity data indicates a gap in representation of employees with disabilities.

Action: Ensure all employees and Board members know how to self-disclose if they have a disability. The organization will also ensure that disclosures are confidential.

Progress update – employees:

- The PBC gathers information about employees' self-identification with the
 employment equity groups defined in the <u>Employment Equity Act</u>. Employees
 can fill out a questionnaire in the human resources management system or
 request a paper form. In addition, letters of offer for new hires include information
 about collecting workforce employment equity data and directions to access the
 questionnaire.
- Twice a year, the PBC sends reminders to employees who have not completed
 the self-identification questionnaire, encouraging them to do so. These reminders
 also assure employees that their self-identification information is protected under
 the *Privacy Act* and is kept confidential.
- In March 2024, the PBC emailed all staff to inform them about the updated definition of disability in the ACA. The email emphasized the importance of selfidentification in the workplace and how this data can help shape organizational policies and programs.
- This action will be considered complete with the launch of a new selfidentification process led by the Treasury Board Secretariat.

Progress update – Board members:

- The Board Member Secretariat is developing a self-identification questionnaire which will be sent to all current and newly appointed Board members once it is finalized.
- The Government of Canada is committed to conducting open, transparent and merit-based selection processes for Governor in Council (GIC) appointments, ensuring that GICs represent Canada's diversity. As part of every GIC process, a Selection Committee is formed to review and approve all assessment tools, and proactively work to remove any barriers in the Board member application process. Applicants who face any barriers that affect their ability to participate in the selection process are encouraged to advise the contact person on the position job advertisement.

Status: In progress

Original Deadline: December 2023
Revised Deadline: December 2025

Barrier: People with disabilities feel they do not have the same opportunity for advancement as non-disabled peers.

Action: Develop a process to support hiring managers in establishing diverse selection boards in their staffing processes. **– Amended**

Original wording: Aim to include diverse members within selection boards for employee staffing processes, including individuals with disabilities.

Progress update:

- Human Resources Advisors are available to help hiring managers with their selection processes by offering advice and guidance on best practices. They explain the importance of having diverse selection boards to ensure a fair assessment of candidates. When running selection processes aimed at recruiting persons with disabilities, managers are encouraged to include persons with disabilities on their selection boards.
- To assist managers in forming diverse selection boards, the PBC created an
 inventory of diverse assessment board members for staffing Processes. This
 database includes employees from across the organization from different
 backgrounds who have various skills and are interested in serving on selection
 boards.
- In July 2024, an email was sent to all employees inviting them to join this
 inventory. Employees can voluntarily identify themselves as belonging to one or
 more designated employment equity groups. Those in the inventory must
 complete training on topics like inclusive hiring practices and understanding
 biases and barriers. To date, 17 employees have registered for the inventory,
 and 7 have completed their training. This initiative is supported by management
 and the Network for Persons with Disabilities.

Status: Complete

Original Deadline: December 2023
Revised Deadline: December 2024

Action: Review merit criteria to identify any barriers to promotions for employees with disabilities.

Progress update:

- Selection board reports, which track information about candidates and their results in selection processes, have been updated to include employment equity data from applicants who voluntarily identify as part of one or more of the employment equity groups. These updated reports help Human Resources review results of selection processes to identify any steps of the process that may create barriers for employment equity groups, such as people with disabilities, and to take corrective action when needed.
- Following changes to the *Public Service Employment Act* (effective July 2023),
 hiring managers must confirm that they have reviewed each evaluation method
 for potential biases and barriers that could disadvantage candidates from
 employment equity groups, including persons with disabilities, before evaluating
 candidates. This review includes the merit criteria, which are the qualifications
 that candidates must meet to be qualified in a process. Hiring managers
 collaborate with Human Resources Advisors to ensure these reviews are
 thorough.
- An initial consultation with the Network of Persons with Disabilities will be held to
 discuss overall barriers that the members have faced in relation to merit criteria
 when participating in staffing processes in the federal public service. This
 valuable information will help Human Resources Advisors to better support hiring
 managers in developing merit criteria.
- Before starting any collective selection process organized by Human Resources, a consultation will take place with the Network for Persons with Disabilities to discuss the merit criteria and identify any barriers that these criteria might create during the selection process.

Status: In progress

Original Deadline: December 2024
Revised Deadline: December 2025

Barrier: Some managers and employees have negative attitudes about disability and accommodations.

Action: Invite a greater number of guest speakers to discuss disabilities with employees and Board members as part of disability sensitivity training.

Progress update:

- The PBC annually promotes the National AccessAbility Week (NAAW) held the last week of May and the International Day of Persons with Disabilities (IDPD) held on December 3rd.
- For the 2023 IDPD, the PBC did not hold a specific speaking event for our staff.
 Instead, our Deputy Chairperson, who is also our Senior Designated Official for Employment Equity, Diversity and Inclusion, invited all staff to join a government-wide half-day virtual event hosted by Innovation, Science and Economic Development Canada (ISED), which was themed: "Beyond the Stigma: Building an Inclusive Canada".
- During NAAW from May 26th to June 1st, 2024, the Network for Persons with a
 Disability hosted a virtual learning event for all staff in both official languages
 called "Invisible Disabilities in the Workplace". The event was well attended by
 staff at all levels, including senior management.
- As part of the launch of the Government of Canada Workplace Charitable
 Campaign (GCWCC), the PBC invited a guest speaker to share her personal
 experience as a caregiver to someone with Huntington's Disease.
- Moving forward, the PBC is committed to working with the Network for Persons
 with Disabilities to invite more guest speakers and promote activities that raise
 awareness and encourage a positive cultural change among employees and
 Board members.

Status: Ongoing



Action: The PBC's leadership will continue to commit to improving accessibility across the organization through practical actions.

Progress update:

- Executives are responsible for fostering a work environment that is inclusive and
 respectful of individual differences. This includes promoting an accessible and
 barrier-free work environment; encouraging employees to self-identify if they are
 part of an employment equity group; supporting participation in employee
 networks and communities and offering language training to employees from
 employment equity groups.
- Executives are evaluated on their leadership in addressing systemic barriers identified in the PBC's Employment Equity Plan and the PBC's 2023-2025 Accessibility Plan. This year, all executives' Performance Management Agreements include the following commitments:
 - Support the implementation of the PBC Accessibility Plan actions and demonstrate accountability by ensuring that key performance indicators are aimed at removing or preventing barriers.
 - Work to close employment equity gaps by using inclusive hiring practices based on the latest regional or divisional employment equity data.
- The Accessibility Champion provides updates and raises accessibility questions during Senior Management Committee meetings.

Status: Ongoing

Action: The PBC will hold ongoing consultations with its Network for Persons with Disabilities, which is a resource group within the organization made up of employees and Board members with disabilities, with the end goal of developing a plan by 2025 for better incorporating accessibility issues within its corporate culture.

Progress update:

 The Accessibility Steering Committee is pleased to report that it continues to have a collaborative and productive partnership with the Network for Persons with Disabilities since its creation in 2022.



- The Network has volunteered to coordinate activities for the annual National AccessAbility Week in May, embracing this opportunity to organize events to raise awareness about disability and accessibility among our employees and Board members.
- The PBC holds quarterly meetings with the Network to discuss accessibility issues, challenges, and ideas. During a recent meeting, data from the Public Services Employee Survey (PSES) related to persons with a disability at the PBC was shared to better understand the barriers they face.
- As a next step, the Committee will work with the Network on identifying key themes from the PSES to help the Board implement a focused approach for future activities and guest speakers.

Status: Ongoing

3.3 The Design and Delivery of Programs and Services

Barrier: There is no process for requesting and receiving accommodations for people who interact with the PBC.

Action: Develop and implement a plan to deliver ongoing training to PBC employees and Board members who have direct contact with the public as it pertains to providing accessible services in the context of the conditional release and record suspensions/pardons programs. **– Amended**

Original wording: PBC employees and Board members who have direct contact with the public will receive ongoing training on providing accessible services.

Progress update - Employees:

• In November 2023, the wording of this action was changed to more accurately reflect the planning and development needed before providing accessibility training, and to clarify that this training is specific to staff and Board members who interact directly with the public in the context of conditional release and record suspensions or pardons programs.



- To start this process, the positions that have direct public contact in these programs were identified by reviewing work descriptions and consulting with management.
- A training plan for PBC employees that focuses on accessibility awareness, recognizing barriers, and finding solutions was created. The plan includes various training methods such an email awareness campaign, an introductory course on barriers and inclusion, and ongoing PBC-specific training moving forward in 2025.
- Progress will be tracked using Canada School of Public Service reports, since most of the planned training on accessibility is provided there.
- The accessibility of public programs and services will be evaluated through questionnaires sent to victims and observers, as well as through our feedback process.

Progress update - Board members:

- The updated Board Member Corporate Learning Roadmap was approved in September 2024 by the PBC Executive Committee. As part of the new curriculum, all Board members must complete a training called "Addressing Disability Inclusion and Barriers to Accessibility" offered by the Canada School of Public Service.
- Board members also receive ongoing training on topics related to accessibility
 and accommodations. This includes how to conduct trauma-informed hearings,
 sensitive interviewing practices, writing decisions in plain language, the needs of
 people with mental health or neuro-cognitive conditions, etc.

Status: Complete

Original Deadline: December 2024

Action: Complete a review of processes for requesting and receiving accommodations for people who interact with the PBC as it pertains to the conditional release and record suspensions/pardons programs and develop recommendations for addressing barriers.

- Amended

Original wording: *Identify specific staff members who will arrange accommodations for people who interact with the PBC.*

Progress update:

- A review of the current process for requesting and receiving accommodations for people who interact with the PBC as it pertains to the conditional release and record suspensions/pardons programs has been completed.
- Through this review, the PBC has identified 16 Accessibility Agents across the
 organization who are responsible for arranging accommodations for people who
 interact with the PBC and sharing useful information with colleagues to address
 special accommodations requests.
- These agents also identified a number of potential barriers for individuals
 accessing PBC's conditional release and records suspension/pardons programs;
 the feedback will inform the development of recommendations currently
 underway.

Status: In progress

Deadline: December 2024

Barrier: The PBC does not communicate directly with offenders' legal counsel and assistants which is creating barriers for offenders with cognitive disabilities.

Action: The PBC will review its practices on communicating with offenders' assistants. **Progress update:**

- The PBC completed the review of its practices on communicating with offenders' assistants in July 2024. The review examined:
 - The PBC's legislated responsibilities relating to the right to assistance at hearings and procedural fairness;
 - Current practices for sharing information with offenders and their assistants; and
 - The PBC's process of releasing decisions through the Board's Registry of Decisions.
- As a result of this review:

- The PBC will work with Correctional Service Canada (CSC) to ensure a common understanding of meaningful disclosure of information with offenders.
- The PBC will consider updating policies and procedures as part of a broader review of policies and procedures related to hearing accessibility (this is an action estimated to be completed in 2025).
- A recommendation was made to provide training for Board members on accessible services to ensure they are aware of the impacts related to access to justice when deciding on adjournments and postponement requests.
- The next steps will be to develop future policy and procedure changes to remove or prevent accessibility barriers.

Status: Complete

Deadline: December 2024

3.4 The Built Environment

Barrier: There are no clear evacuation guidelines specific to persons with disabilities in an emergency.

Action: Each PBC office will circulate its evacuation plans to all employees and Board members.

Progress update:

- The PBC offices have completed their Building Emergency and Evacuation Plans (BEEPs) and have had them circulated to their employees and Board members.
- The Network of Persons with Disabilities was consulted on these plans.

Status: Complete

Original Deadline: December 2023
Revised Deadline: December 2024



Action: Develop a process to allow employees and Board members to request individualized emergency plans, as required.

Progress update:

- The PBC has seven offices across Canada, each with its own unique features and logistical considerations. Our initial review of workplace accessibility showed that not all employees knew how to evacuate their office building during an emergency. Additionally, the existing BEEPs did not fully address accessibility needs.
- All BEEPs have been reviewed to ensure that employees and Board members
 with disabilities who need help during evacuations or other emergencies are
 taken into account. These updated plans have been shared with all employees,
 including those with disabilities.
- Every year, we send an email to all employees and Board members explaining
 how individuals who need assistance (such as those with disabilities,
 psychological considerations, recent surgeries, pregnant individuals, or mobility
 impairments) can identify themselves. The email also includes instructions for
 designating monitors to provide support.

Status: Complete

Original Deadline: December 2023
Revised Deadline: December 2024

Action: Revisit its evacuation plans to take hybrid work into account.

Progress update:

- The following initiatives have been developed to support this action:
 - A new telework agreement for staff, which includes guidelines for being prepared for emergencies while working from home.
 - The development and implementation of BEEPs for each office. With the recent shift to a hybrid work model requiring staff to be in the office a minimum of 3 days a week, the PBC has updated its emergency management procedures to reflect this. For example, now there are multiple wardens assigned to help during evacuations. This means there



will be a designated emergency warden for each day of the week, instead of just one warden and a backup, as was the case before the pandemic.

Status: Complete

Original Deadline: December 2023
Revised Deadline: December 2024

Barrier: Barriers to the physical environment at offices have been identified in former accessibility audits.

Action: Address any high priority physical barriers identified in its offices.

Progress update:

- The PBC has been actively addressing barriers identified in accessibility studies done in 2019-2020 by Public Service and Procurement Canada's (PSPC) Office of Accessibility in the Built Environment. These studies were completed using accessibility standards for built environments that verify compliance and identify issues.
- Among the various issues found, the PBC took the following steps to correct those of highest priority:
 - Automatic Door Openers: Automatic door openers have been added to perimeter doors and washrooms at the National Office and Prairie Regional Offices.
 - Updated Washroom Hardware: Some washrooms at the National Office had door locks that required a tight grip and wrist twist to open. The PBC replaced this hardware to make it compliant with accessibility standards.
 - New Carpet: The carpet in the Pacific Regional Office was damaged, creating tripping hazards, especially for wheelchair users. It has been removed and replaced with new carpet.
 - Adjusted Shelving: The records room in the Pacific Regional Office had shelves that were too high and too close together for easy access from a seated position. The shelving has been removed, and the files have been relocated.

 Additionally, the Atlantic Regional Office moved into a new space in late 2022, which was designed according to current accessibility standards. The Pacific Region also renovated their 3rd floor in early 2024, following the latest accessibility guidelines.

Status: Complete

Deadline: December 2024

3.5 Communication, other than Information Communication Technologies (ICT)

Barrier: There is no established process for the public to request and receive forms and documents in alternate formats.

Action: Create, implement and promote a process to provide specific publications on its website in alternate formats, upon request.

Progress update:

- The Corporate Services Division worked with Public Affairs and Partnerships to create a process for handling requests for alternate formats of PBC publications.
- A new webpage to request alternate formats has been posted on the Accessibility Section of PBC's website.

Status: Complete

Deadline: December 2024

Barrier: Documents and forms are often written in complex language.

Action: Develop plain language guidelines for all written communications. These internal guidelines, based on Government of Canada standards, will provide guidance, information and resources for applying plain language principles and practices.

Progress update:

 The guidelines on the use of plain language are in the final stages of development. The development of this document involved the research and



- collection of information on the use of plain language, resources and best practices from other federal departments, governments, and experts from various sectors.
- These guidelines are meant for all employees, especially those who write and/or
 edit publications like annual reports, statistical reports, policy manuals,
 procedures, forms and correspondence. They will offer tips for writing in plain
 language and include links to helpful tools and resources, including existing
 Government of Canada plain language resources like the <u>Canada.ca Content</u>
 <u>Style Guide</u> and <u>Plain language</u>, accessibility, and inclusive communications
 resources.
- The Network for Persons with Disabilities will be consulted on the draft guidelines. The guidelines will then be sent for approval, posted on the internal website and promoted to all staff.

Status: In progress

Original Deadline: December 2024
Revised Deadline: December 2025

Action: Continue to strengthen Board members' training and associated decision-writing tools to further promote the use of plain language.

Progress update:

- Through practical learning, Board members gained knowledge of various approaches to decision-writing (e.g., issue-driven writing, point-first writing, use of plain and inclusive language). These skills help them communicate effectively with their audiences and meet legal requirements for clear and transparent decisions.
- The Board Member Secretariat Division is working with an expert to update the Board Members' Handbook, a valuable guide for writing clear and concise decisions. The Board Member's Handbook references other PBC documents, including those prepared by Hearing Officers for Board members. These related documents are being reviewed and updated and the results of this work will directly affect the contents of the Handbook.

Status: In progress

Original Deadline: December 2024
Revised Deadline: December 2025

3.6 Information and Communication Technologies (ICT)

Barrier: Internal applications and intranet have not been assessed for accessibility and therefore may present barriers.

Action: Promote awareness of digital accessibility standards and provide training for Information Technology (IT) staff.

Progress update:

- PBC IT employees have completed the course "W3Cx: Introduction to Web Accessibility" on the online platform edX. This course teaches the basics of making digital technology accessible, checking web pages for accessibility issues, and improving overall accessibility.
- PBC IT employees have familiarized themselves with the accessibility requirements for information and communication technologies products and services from Accessibility Standards Canada. This document not only builds on existing guidelines for web accessibility but also includes advice on making hardware accessible.
- The PBC IT team is committed to ongoing learning about accessibility issues.
 Team members have an annual performance goal to complete at least one accessibility course from the Canada School of Public Service and to stay updated on new accessibility developments by participating in Government of Canada initiatives, networking, and media monitoring.
- The PBC has a Master Service Agreement (MSA) with Correctional Service
 Canada (CSC) for IT services. During the annual review of this agreement, the
 Chief Information Officer and Deputy Chairperson will ensure that training on
 digital accessibility standards and requirements is included for IT staff and thirdparty service providers.

Status: Complete

Deadline: December 2024

Action: Embed accessibility requirements in all internal development processes to ensure all new applications meet Web Content Accessibility Guidelines (WCAG) accessibility compliance standards.

Progress update:

- CSC is responsible for providing IT services for the PBC, including the
 development of internal applications. Therefore, the PBC is committed to
 including a requirement in the MSA with CSC for WCAG standards to be met
 during the development of these internal applications. The PBC is focused on
 finding solutions that consider accessibility requirements when developing an
 application or form to be used.
- The 2024-2025 MSA includes a statement to meet WCAG accessibility compliance. The 2025-2026 MSA will include additional web-based solutions, non-web-based solutions and hybrid technologies.
- The principle of accessibility by design is implemented when new PBC-specific applications are to be built. The <u>Checklist for Web Content Accessibility</u>
 <u>Guidelines 2.0</u> assists the PBC in meeting all the success criteria for WCAG 2.0.

Status: In progress

Original Deadline: December 2024
Revised Deadline: December 2025

3.7 Transportation

Barrier: Vehicles used by the PBC are not accessible for people with mobility disabilities and getting permission to use one's own vehicle presents some challenges.

Action: By the end of 2024, the PBC will have a plan to make it easier for persons with disabilities who need an adapted vehicle to make a request to use their own vehicle

when travelling for work, in accordance with the <u>National Joint Council (NJC) Travel</u> Directive.

Progress update:

- Since the publication of the PBC 2023-2025 Accessibility Plan, the senior management team has decided to reduce the number of fleet vehicles owned and managed by the Board. This is part of a larger, government-wide initiative to reduce environmental impact. Employees will have the option to use their own vehicles when travelling on official business.
- The process of reducing the fleet will take a few years, and during this time, the Board will continue to identify and resolve any potential barriers.

Status: Complete

Deadline: December 2024

3.8 The Procurement of Goods, Services and Facilities

After careful review of our policies, practices, programs and services, including the consultation with persons with a disability (external and internal) during the development of the 2023-2025 Accessibility Plan, no barriers were identified in the area of the procurement of goods, services and facilities. The PBC therefore does not have any action updates to share in this Progress Report.

4 Consultations

4.1 Consultations with PBC Network of Persons with Disabilities

In 2022, the Board established a Network of Persons with Disabilities for employees and Board Members who have disabilities, or who are active supporters of persons with disabilities. The Network is made up of 17 members, including two Co-Chairs, a Student Leader, and a Steering Committee Liaison. The Network is also supported by an

executive-level Champion. This group has been providing valuable input on accessibility issues across the organization to the Steering Committee via regular meetings and consultations.

The Network was consulted throughout the reporting period on the implementation of the Accessibility Plan's 2024 actions. Members were invited to review the actions from the Plan with target completion dates of 2024 and indicate those they wanted to be consulted on specifically. The Network confirmed they would like to be consulted on 15 of the 25 actions. Nine (9) of those consultations are complete and the remaining six (6) will take place in 2025.

The Network was also consulted on the Progress Report in October during a virtual round-table session. Members were presented with a draft copy of the Report to review one week prior to the consultation along with reflection questions about the content and organization of the report. Overall, the Report was well received, and the Network acknowledged that the steps the Board has taken are positive. Members appreciated seeing that their input throughout the year was reflected in the progress being made. The Network stated that, moving forward, specific performance measurements are needed in order to assess the level of progress in removing the barriers that were identified in the Plan. In particular, they would like to see more measurable progress on the actions related to facilitating the accommodations process for employees.

4.2 External Consultations with Persons who Have Disabilities

The PBC consulted with a focus group of persons with a variety of disabilities from across Canada. The group was presented with a draft of the Progress Report to review, followed by a virtual round-table consultation one week later, which was led by a third-party consultant. Questions were asked to prompt group members on their thoughts and opinions.

Generally, participants appreciated the progress that the PBC has made this year and felt that it demonstrated a commitment to positive change. They also appreciated the transparency, which was noted in the detailed explanations about the status of each action, including impacts and challenges. The main concerns from this consultation group were regarding the length of the report and the complexity of the language, both of which the Steering Committee has taken measures to address.

All consultation input we received was considered, and either incorporated in this progress report or retained for future consideration.

We continue our work in addressing accessibility by our guiding principle "Nothing Without Us." We are appreciative of the effort of members of the Network in supporting this initiative and that of the external consultation focus group. Feedback received from all our consultations have improved our delivery of program and services to Canadians.

5 Feedback

Since the publication of its 2023 Accessibility Progress Report, the PBC has received five pieces of feedback through its accessibility feedback mechanisms, which were within the scope of the PBC's work to address, remove and prevent accessibility barriers:

 Feedback received (by the Online Feedback Form): An individual attempted to contact the PBC's Clemency and Record Suspension Division while there was a brief outage of its Record Suspension Infoline.

Actions taken: To address this barrier when outages of the Record Suspension Infoline occur, the PBC has adopted a protocol that upon becoming aware that there will be/is an outage of the Record Suspension Infoline that goes beyond four hours and with no set time confirmed for restoration, a notice will be published on the PBC's internet web page notifying the public that the Record Suspension line is

experiencing technical issues. Once the telephone line is restored, the notice will be removed. Generally, for outages less than four hours and when technologically feasible, a message will be activated on the telephone line itself notifying the public that the Record Suspension line is experiencing technical issues. Once the telephone line is restored, the notice will be removed.

- 2. **Feedback received (by e-mail):** An individual stated that they experienced barriers after applying for positions at the PBC and wished to file a complaint after being subjected to disability discrimination and racism.
 - **Action taken:** To address this barrier, the PBC requested more information to address, resolve and prevent future staffing accessibility barriers. The PBC also provided the individual with many resources and ways they could look into filing an official complaint on the allegations, including an opportunity to confidentially discuss the situation with key staffing representatives at the PBC. Although the individual did not provide more information on the barriers faced, the PBC will continue to proactively seek to eliminate accessibility barriers in all its staffing processes and ensure that candidates continue to reflect Canada's diversity.
- Feedback received (by e-mail): In the context of the virtual observation of a
 conditional release hearing, an individual reported that the sound and image quality
 of the videoconference was not consistent, presenting a barrier for persons with
 hearing limitations.

Action taken: Since receiving this feedback, PBC staff collaborated to implement accessibility measures, including providing staff with detailed instructions on activating closed captioning and guidance on ways to improve sound quality at a hearing, to ensure these barriers are removed before the hearing. This feedback will also help inform the PBC's review of procedures and policies related to hearings to improve their accessibility, an action which is scheduled to be completed by December 2025.



- 4. **Feedback received (by e-mail):** An individual enquired about the procedures in place for requesting non-standard IT equipment, particularly what employees need to provide to support their request, and to whom this request should be sent. The individual also asked what guidance, if any, is provided to employees about this process, and where this information is kept (and to whom is it made available). Finally, the individual asked about the limitations that exist when trying to access these solutions, for example when there is a need to weigh the concept of Duty to Accommodate with budgetary constraints and other similar limiting factors. Actions taken: To address this barrier, the PBC will develop a document that defines a standard process to follow for non-standardized IT equipment requests, which will also include areas of responsibilities for all the stakeholders that are involved in obtaining these solutions. Once the process is implemented, training sessions for managers and supervisors will be offered to ensure a unified approach with requests for non-standard IT equipment. In the meantime, the individual was informed that employees can approach their manager with any accommodation concerns, or use the existing tools that help to enable that conversation (e.g., the GC Workplace Accessibility Passport).
- 5. Feedback received (by e-mail): An individual faced barriers when using high contrast accessibility reader options on PDF versions of the PBC's corporate documents. Particularly, the individual stated that the PBC corporate image that was labelled on documents created a barrier when activating the high contrast, reducing the full readability of text.

Actions taken: To address this barrier, the Designated Official for Accessibility worked closely with the PBC's communication team and with the individual (with their consent) to find an appropriate solution to remove the corporate image from the document that was causing the barrier. Although the PBC's corporate documents meet the GoC web standards for accessibility, to remove the barrier raised, the PBC will be adjusting the images placed on its corporate tools to ensure that the high contrast reader options continue to be accessible when used on all PBC documents.

6 What We've Learned

The Board is continuously learning about accessibility and the ways to effect positive change for persons with disabilities. We are proud of the concrete progress made on our actions while acknowledging the following lessons we have learned along the way.

- Reporting period: We needed to set a new reporting period to allow enough time for developing and publishing our progress reports by December 31 each year. This will help ensure consistency in reporting from year to year. Moving forward, the annual reporting period for progress reports is now from November 1 of the previous year to October 31 of the current year.
- Results-orientation: To make our actions more achievable and measurable, the Board will need to use more specific, action-oriented language. In our 2023-2025 Accessibility Plan and 2023 Progress Report, we called our commitments "goals". In this report, we have changed this wording to "actions" to better reflect our intent to achieve results. In Section 3 of the report, some actions have been reworded since the Plan was published to more accurately reflet the work involved. For these actions, the original wording is also included for reference.
- Complexity and impact: Since many of our actions have broad organizational impacts, they require consultation with partners and stakeholders (internal and/or external) and various stages of approval for effective implementation.
 Additionally, progress on one action can affect the ability to work on others.
 Because of this, we underestimated how long some actions would take, leading us to extend certain deadlines. In future accessibility plans, the Board will plan actions more systematically, considering their complexity and any dependencies on other actions when necessary.
- Performance measurement: To ensure our actions are effective, we will need
 to develop clearer performance indicators. The PBC is developing a
 measurement framework using the S.M.A.R.T. method (specific, measurable,



achievable, realistic, timely) for setting our goals. It is important to link our measurements to existing data, both qualitative and quantitative. For example, the Board can use the results of the Public Service Employee Survey (PSES), which is conducted across the public service every two years.

- Financial and operational challenges: The PBC has also experienced challenges implementing actions due to a lack of funding for some initiatives and operational difficulties caused by competing priorities.
- Culture change: Our work to date has reinforced the importance of considering
 accessibility in everything we do from the start. The Board understands that
 working together consistently will help change attitudes and processes, making
 accessibility a core part of how the Board operates. The cultural change we aim
 to create will happen gradually, and it may be a few years before the full benefits
 of the changes are seen. Therefore, the Board needs to remain focused and
 consistent in its efforts to keep building momentum.

7 Conclusion

The PBC is proud of the progress we have made as an organization in implementing the 2023-2025 Accessibility Plan. As we continue our accessibility journey, we remain committed to keeping accessibility and inclusion at the forefront of our programs and services and in our duties as an employer to create a safe, respectful and productive work environment. We look forward to continued partnerships with employees with disabilities and subject matter experts to ensure that our actions are relevant and positively impactful.

