



# CFMWS Accessibility Report January to December 2023



**Centre for Conflict Resolution and Ethics /  
Human Resources Legislated Programs**

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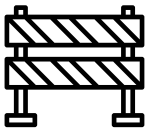
## GENERAL

### Accessibility

In 2010, Canada ratified the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD). By signing the UNCRPD, the Government of Canada committed to furthering the rights of persons with disabilities. The development of national accessibility legislation – the Accessible Canada Act (ACA) and subordinate regulations, the Accessible Canada Regulations (the “Regulations”)- fulfilled the Government of Canada’s commitment to accessibility and the rights of persons with disabilities.

The Accessible Canada Act is landmark federal legislation that aims to realize a barrier-free Canada on or before 1 January 2040.

### What is a Barrier?



Under the Accessible Canada Act, a barrier refers to

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.

### What is a Disability?



Under the Accessible Canada Act, a disability refers to

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.

## Enquiries, Feedback and Alternative Formats

Requests for CFMWS Accessibility Plan in one of the alternate formats described in subsection 17(2) of the regulations, requests regarding the description of CFMWS’ feedback process in one of the alternate formats described in subsection 9(5) of the regulations, and general feedback and information requests regarding this plan should be addressed to

**Human Resources Legislated Programs team**

**Email:** [hr-programs-inquiries-demands-programmes-rh@cfmws.com](mailto:hr-programs-inquiries-demands-programmes-rh@cfmws.com)

**Phone:** 1-819-271-8728

**Address:** 4210 Labelle Street, Gloucester, ON, Canada K1J 1J7



# THE ACCESSIBLE CANADA ACT

The overarching purpose of the Accessible Canada Act is to achieve a Canada without barriers, especially for persons with disabilities, on or before January 1, 2040. This will be achieved by the **identification** and **removal** of barriers, and the **prevention** of new barriers, in the areas of:

- Employment
- The built environment
- Information and communication technologies (ICTs)
- Communication
- The procurement of goods, services and facilities
- The design and delivery of programs and services
- Transportation
- Other areas as established by Regulations

## Principles of the Accessible Canada Act

The Accessible Canada Act should be carried out in accordance with the principles that:

- All persons be treated with **dignity** regardless of their disabilities
- All persons **must have the same opportunity** to make for themselves the lives that they are able and wish to have regardless of their disabilities
- All persons must have **barrier-free access to full and equal participation** in society, regardless of their disabilities
- All persons must have **meaningful options and be free to make their own choices**, with support if they desire, regardless of their disabilities
- Laws, policies, programs, services and structures **must take into account** the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons
- Persons with disabilities **must be involved in the development and design** of laws, policies, programs, services and structures



# REQUIREMENTS UNDER THE ACCESSIBLE CANADA ACT

## Initial Accessibility Plan (Regulations, s.5; ACA, s. 69)



**Consult** with persons with disabilities in the preparation of the initial Accessibility Plan



Includes policies, programs and services in relation to the **identification, removal and prevention** of barriers in the areas of:

- Employment
- The built environment
- Information and communication technologies (ICTs)
- Communication (other than ICTs)
- The procurement of goods, services and facilities
- The design and delivery of programs and services
- Transportation



Include information about a feedback mechanism for the identification, removal and prevention of barriers

## Annual Progress Report (Regs, s.44)

The CFMWS must publish an annual progress report by December 31 each year on the implementation of its Accessibility Plan.

In the preparation of the Annual Progress Report, the CFMWS must



consult persons with disabilities in the preparation of its progress report



set out the manner in which persons with disabilities were consulted in the preparation of this progress report



set out information concerning the feedback received through its feedback process and how that feedback was taken into consideration



# ABOUT THE 2022-2025 CFMWS ACCESSIBILITY PLAN

The CFMWS published its initial Accessibility Plan and notified the Accessibility Commissioner on 30 March 2023.

## The 2022-2025 CFMWS Accessibility Plan

### **Employment**

- Continue to educate employees on accessibility, diversity, equity and inclusion
- Create a central intake and case management system to facilitate communication related to barriers

### **Information and Communication Technologies**

- Respect ACA principles when procuring IM/IT goods and services
- Training and tools to be provided to employees responsible for IT to promote ACA principles

### **Procurement**

- Continue to respect ACA principles in the procurement of goods and services

### **Transportation**

- Continue to offer Flexible Work Options and accommodations to meet transportation-related needs of employees

### **The Built Environment**

- Provide assistive devices and tools for employees with disabilities
- Monitor and identify structural barriers

### **Communication**

- HRLP will work with Marketing and Member Experience to develop best practices to produce communications and media that respect ACA principles

### **Design of Programs and Services**

- Continue to respect ACA principles in the design of programs and services

## Specific Goals in the 2022-2025 CFMWS Accessibility Plan



**31 December 2023**

Create processes to identify barriers in the workplace and support the application of the ACA



**September 2024**

Define CFMWS' first Accessibility Strategy (based on a collaborative effort with Divisional Stakeholders)



**December 2024**

Divisions will be provided with additional training opportunities, resources, and tools to apply accessibility principles in their activities. Data on training completed and the measures taken by Divisions to promote workplace accessibility will be part of the bi-annual report.



## OUR PROGRESS

### Year 1 Objective:

**December 2023**

Create a process to identify barriers in the workplace and support the application of the ACA

### What has been done so far?



Launch of a new email address prior to the publication of the Accessibility Plan to receive feedback and complaints related to accessibility:

**hr-programs-inquiries-demandes-programmes-rh@cfmws.com**

### What's Next?

- New **CORE** page related to Accessibility
- Increase **awareness** and **visibility** of feedback mechanism



Review the Employment Accommodations program - Identify gaps, challenges and areas for improvement

- Informal consultations on the Employment Accommodations program, as it pertains to Persons with Disabilities
- Review of cases (Workplace Harassment and Violence Prevention, Employment Accommodations) and identify gaps, challenges and areas for improvement
- Hire a Program Manager to review policy and procedures and implement a toolkit based on prohibited grounds of discrimination

### What's Next?

- Review and update the Employment Accommodations policy
- Review and update procedures related to Employment Accommodations
- Develop packages for managers and employees to streamline requests and processing of requests for accommodations

Note: Cases pertaining to accessibility, employment accommodations, and discrimination related to persons with disabilities are flagged through multiple mechanisms, including the new HR Programs email address.



## OUR PROGRESS

### Year 1 Objective:

#### **December 2023**

Create a process to identify barriers in the workplace and support the application of the ACA

#### **What has been done so far?**



Strengthen the relationship between HR Programs (the team that oversees the Accessibility portfolio) and Champion for Persons with Disabilities

#### **What's Next?**

- Formalize the feedback loop from the Network of Allies / Champion for Persons with Disabilities and HR Programs and Services



Pilot Project: Consultation with COO (Data and Information Management team) on a Records and Information Management System (RIMS) for the CFMWS, with a pilot in our SISIP division

#### **What's Next?**

- Conduct outreach to CFMWS employees to identify User Acceptance Testing (UAT) users to test the system's accessibility features





## SUCCESS STORY: RIMS PROJECT

### What is the RIMS Project?

The RIMS project (Records and Information Management System) project is an organization-wide initiative to replace the current document storage and network file shares with a fully-governed, cloud-based system.

The RIMS team consulted with the Champion for Disabilities and HR Programs to:

- Determine requirements to ensure that the new system is compliant with the Accessible Canada Act in principle and in practice
- Develop a mechanism to consult with persons with disabilities at all stages of the planning, development and implementation process, including but not limited to testing and training

The RIMS project has laid the groundwork for the development of best practices related to:

- Respecting ACA principles when procuring IM/IT goods and services
- Creating a process to identify barriers in the workplace and support the application of the ACA as it pertains to Information and Communication Technologies

### Consultations: How did consultations with Persons with Disabilities occur?

- Beginning in March 2023, the Champion for Persons with Disabilities and HR Programs were consulted regularly on accessibility requirements
- A survey requesting volunteers to help with testing and consultation was published as part of the communications related to the publication of the Progress Report and the International Day for the Persons with Disabilities

The survey was administered jointly with the Champion for Persons with Disabilities and HR Programs to ensure privacy and confidentiality.

- A feedback mechanism for accessibility concerns was included in the training presentations on the RIMS system

### What best practices emerged from this process?

- Leverage the expertise of the Office of Public Service Accessibility at Treasury Board
  - HR Programs is a member of the Government of Canada Accessibility Passport Adopter Community
- Divisional stakeholders engage in early consultation with the Champion for Persons with Disabilities and their Network of Allies via HR Programs
- For ICTs, accessibility testing and consultation should be conducted by CFMWS employees (in addition to a third-party service provider, where applicable), so that:
  - Privacy and confidentiality of said employees is protected at all stages of the consultation and testing process
  - Data collected is anonymized through an intermediary (i.e. HR Programs, Champion for Persons with Disabilities)

After consulting with the Network of Allies for Persons with Disabilities and with the Champion for Persons with Disabilities about the progress of the RIMS project, a need has been identified to develop specific mechanisms for consultation and feedback in each of the seven priority areas identified in the ACA. **This is further elaborated upon on the next page of this report.**



# LESSONS LEARNED: THE BUILT ENVIRONMENT

## Feedback

In October 2023, a preliminary version of this Progress Report was presented at the monthly meeting of the Network of Allies for Persons with Disabilities. During this meeting, allies were supportive of the work undertaken on the RIMS project and on the hiring of a new Program Manager for Employment Accommodations program. Allies raised specific concerns about barriers in the workplace related to the physical environment. In particular, they noted challenges in addressing barriers due to the CFMWS' lack of ownership over its physical workspaces.

**These limitations were acknowledged in the 2022-2025 CFMWS Accessibility Plan:**

*"CFMWS operates primarily on military bases and installations. Therefore, most of the buildings used to provide services are not owned or operated by CFMWS. This has an impact on CFMWS' ability to invest in, or control, structural modifications. [...] With these constraints in mind, we will provide assistive devices and tools for employees with disabilities, such as adjustable height desks, Assistive Technology, and quiet rooms. CFMWS will continue to monitor and identify structural barriers and report accessibility barriers to building owners."*

## Addressing Barriers in the Built Environment

Due to a lack of ownership over many physical workspaces, a separate process for identifying and mitigating barriers in the built environment will be required. While IM/IT projects, like the RIMS project, are future-focused, aimed at preventing new barriers; addressing barriers in the built environment involves examining current situations and will need to be conducted, in the short-term, on a case-by-case basis.

### 1) Strengthening the Link between Occupational Health and Safety (OHS) and Accessibility

- In August 2023, the Occupational Health and Safety (OHS) Program was officially brought into the HR Legislated Programs portfolio.
  - Under Part II of the Canada Labour Code, employers have a responsibility to prevent accidents, injuries and illnesses in the workplace and to ensure the health and safety of employees.
  - Part II of the Canada Labour Code is supplemented by the Canada Occupational Health and Safety Regulations, which outline employer responsibilities in the areas of the built environment, hazardous materials, and equipment, among other responsibilities.

**When accessibility barriers are identified related to the built environment, they will be examined through an occupational health and safety lens. The National OHS team will liaise with local OHS committees and representatives to better understand the specific barrier identified and will engage with RP Ops to identify solutions to remove the barrier.**

- **A database of barriers and mitigation measures will be developed for reference in future cases.**

### 2) Employment Accommodations and Accessibility

- Where a barrier to accessibility cannot be removed in the workplace, employees may request an accommodation on the grounds of disability.
  - Managers will be required to work collaboratively with their employees who request an accommodation for reasons of disability to find a solution that mitigates the impact of the barrier on the employee while fulfilling operational requirements.



## NEXT STEPS: IDENTIFICATION OF BARRIERS

### Status: Year 1 Objective

Consultations with Persons with Disabilities, via the Network of Allies for Persons with Disabilities, have shown that a one-size-fits-all approach will not work to identify and address all barriers in the workplace.

Processes to identify accessibility-related barriers have been successfully developed in the areas of:

- Information and Communication Technologies

- The development, implementation and procurement of ICTs in the workplace will involve early consultation with the Champion for Persons with Disabilities and HR Programs.
- Accessibility testing and consultation will be conducted by CFMWS employees (in addition to a third-party service provider, where applicable), so that privacy and confidentiality are respected
- A feedback mechanism for accessibility-related barriers will be provided to employees at all stages of implementation.

- The Built Environment

- Barriers in the built environment will be examined from an occupational health and safety lens, with the national OHS team working in collaboration with local OHS committees and representatives as well as RP Ops.
- Where a barrier cannot be removed, employees may request an employment accommodation on the grounds of disability. Managers will engage in the employment accommodation process, working collaboratively with their employees to find solutions that mitigate the impact of barriers while maintaining operational requirements.

### Next Steps: Year 1 Objective

The CFMWS will continue to consult and develop processes for the identification of barriers in the areas of

- Employment
- Communication (other than ICTs)
- The procurement of goods, services and facilities
- The design and delivery of programs and services
- Transportation

#### Reporting a barrier in the built environment:

- Employees who would like to provide feedback on or report a barrier in the workplace may:
  - Contact the HR Programs team ([hr-programs-inquiries-demandes-programmes-rh@cfmws.com](mailto:hr-programs-inquiries-demandes-programmes-rh@cfmws.com))
  - Contact the Champion for Persons with Disabilities and/or a member of the Network of Allies for Persons with Disabilities, who will liaise with the HR Programs team on behalf of the employee (respecting any requests for anonymity)

