Office of the
Privacy Commissioner
of Canada

Commissariat
à la protection de
la vie privée du Canada

2022-2025 Accessibility plan for the Office of the Privacy Commissioner of Canada:
Moving toward a more accessible OPC

December 2022

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Executive summary

The Office of the Privacy Commissioner of Canada (OPC) is an Agent of Parliament whose mission is to protect and promote privacy rights.

The OPC supports a culture that embraces diversity and inclusion in order to provide the highest quality of service to Canadians and enable the full participation of its employees, clients and stakeholders in the delivery of its activities and its mandate. The Canadian legislative framework that supports diversity and inclusion was strengthened by the addition of *An Act to ensure a barrier-free Canada*, also known as the *Accessible Canada Act* (ACA or the Act), which came into force on July 11, 2019.

This document sets out the OPC's plan for reducing barriers and preventing the introduction of new barriers over the next three-year period in seven priority action areas by identifying ten organizational goals:

Goal 1 – Create a culture of accessibility, where respect and inclusion are embedded in all aspects of the workplace and where all employees are empowered and supported to achieve their full potential.

Goal 2 – Implement accessible practices to eliminate and prevent barriers to the recruitment, retention, and promotion of persons with disabilities.

Goal 3 – Ensure that OPC employees are sufficiently equipped to deliver accessible programs and services.

Goal 4 – Provide Canadians with barrier-free access to the OPC's programs and services.

Goal 5 – Create a workplace free of physical barriers to improve the working environment for all OPC employees of various abilities.

Goal 6 – Ensure that all employees have a safe environment to work in.

Goal 7 – Provide accessible technology to ensure that all staff have access to the tools and platforms that they need to perform their work.

Goal 8 – Acquire and implement technologies that ensure that all Canadians can access Government of Canada programs and services.

Goal 9 – Ensure that OPC communications products are developed within an "accessibility by design" culture, where staff at all levels are aware of accessibility requirements.

Goal 10 – Share knowledge and best practices widely to reduce barriers across the public service.

General background

The Government of Canada (GoC) aspires to have a public service that is accessible by default for the Canadian public, government institutions and their workforce. This aspiration is rooted in the belief that an inclusive public service is more innovative, efficient and productive. The goal is to make Canada's public service barrier-free.

The government has placed significant emphasis on improving the participation of persons with disabilities in the federal public service and in the Canadian workforce. The results of the 2017 Canadian Survey on Disability suggest that 6.2 million Canadians aged 15 and over (22% of the population) have a disability, though the actual numbers are likely higher. As a result of the physical, administrative, institutional, technological and attitudinal barriers that exist in the workplace, persons with disabilities are underrepresented in the Canadian labour force. Only 59% of Canadians with disabilities aged 25 to 64 are employed, compared to 80% of Canadians without disabilities.

The number of people living with a physical disability is expected to rise from 2.9 million to 3.6 million over the next 13 years, nearly doubling the pace of population growth overall. Removing barriers that prevent persons with disabilities from purchasing goods and services and accessing both business and government services and employment is critical to both improving their quality of life and ensuring that Canadian society benefits from their valuable participation.

The Accessible Canada Act

The GoC held consultations with persons with disabilities and the disability community and heard from more than 6,000 Canadians about what an accessible Canada means to them. This consultation informed the creation of the *Accessible Canada* Act (ACA).

The ACA, which came into force on July 11, 2019, takes a proactive and inclusive approach to identifying and eliminating barriers in federal jurisdiction by 2040. It includes 7 priority areas for action:

- employment
- built environment
- information and communication technologies
- communication
- procurement of goods, services and facilities
- design and delivery of programs and services
- transportation

Under the ACA, federally regulated entities must report to the public on their policies and practices in relation to the identification and removal of barriers by publishing their accessibility plans, feedback processes and progress reports.

Each department, agency and federally regulated employer is also required to develop an accessibility plan and report on progress made against this plan annually, starting in December 2022.

Government of Canada context

The ACA will guide government departments, agencies and federally regulated organizations in removing barriers to achieve full accessibility and in their reporting obligations to demonstrate progress.

A federal workforce that is reflective of the Canadian population is viewed as essential to the design and implementation of programs and services that are bias- and barrier-free and address the needs of all Canadians.

It is important to note that the federal government has introduced many initiatives over the years to increase the representation, promotion and retention of employment equity group members and to systematically reduce any barriers. Federally regulated organizations, including all federal government departments and agencies, undertake these actions consistent with the *Employment Equity Act* (EEA), which covers visible minorities, Indigenous peoples, persons with disabilities and women.

As a country, Canada is recognized globally for its support of diversity. Along with the ACA and the EEA, the Canadian Charter of Rights and Freedoms, the *Canadian Human Rights Act*, the P*ay Equity Act*, the *Canadian Multiculturalism Act*, the *Official Languages* Act, the *Privacy Act* and the *Personal Information Protection and Electronic Documents Act* (PIPEDA) are also part of the legislative framework supporting diversity and inclusion in Canada.

OPC Context

The OPC oversees compliance with the *Privacy Act*, which covers the personal information-handling practices of federal government departments and agencies, and the PIPEDA*,* Canada's federal private-sector privacy law. The OPC provides advice and information for individuals about protecting personal information.

The OPC's work focuses on:

- investigating complaints, conducting audits, and pursuing court action under the *Privacy Act* and PIPEDA
- publicly reporting on the personal information handling practices of public and private sector organizations
- supporting, undertaking and publishing research into privacy related issues
- promoting public awareness of privacy issues
- communicating with and providing advice to Canadians, government organizations and businesses on privacy issues

The OPC has approximately 200 employees who are dedicated to protecting the privacy rights of Canadians.

While the OPC has had an employment equity program for many years, senior management has recognized the need to strengthen recruitment and workplace initiatives in relation to persons with disabilities and work towards building a more diverse workforce, a more accessible work environment and a more equitable approach to working with Canadians.

The OPC's aim with this accessibility plan is twofold: identify, remove and prevent accessibility barriers in the OPC's delivery of services to the public, and continue to address the accessibility needs of its employees.

Moving toward a more accessible OPC – Activities that support accessibility

The OPC's accessibility plan is supported by other relevant initiatives, including the Human Resources Strategic Plan 2020-2023 and Employment Equity, Diversity and Inclusion (EDI) Strategic Action Plan 2021-2024; the designation of an EDI Champion and Wellness Action Champion;   and the establishment of several joint employee-management committees that advance accessibility and inclusion in the workplace, including the Employment Equity, Diversity and Inclusion Committee, Gender Based Analysis+, Wellness Action Team and Inclusive Services.

For example, in 2015, the OPC implemented a policy on accommodating clients with disabilities to create and maintain an inclusive, barrier-free environment for the delivery of public-facing services. Although this policy was implemented before the ACA was enacted, its objective was to create an organisation where accommodation was a proactive rather than a reactive process.

In addition, in 2019, the OPC conducted an accessibility review of its website to ensure it meets Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, which are part of web accessibility guidelines published by the Web Accessibility Initiative of the W3C, the main international standards organization for the Internet. The OPC contracted with a consultant to review the website and evaluate its compliance with WCAG 2.0 Level AA. The consultant provided guidance to help the OPC achieve this level and the confirmed our compliance.

The OPC complies with the Standard on Web Accessibility, which requires WCAG 2.0 Level AA compliance and helps ensure our site is navigable using screen readers and accommodates users with other visual or cognitive difficulties as well as physical disabilities. We also continually review and improve our website content in terms of plain language and usability, with a focus on key documents, including forms destined for the Canadian public and highly technical or legal guidance for businesses and organizations. The OPC will further enhance the accessibility of our website by letting users know they can request content in alternative

formats such as Braille and by providing contact information (publications@priv.gc.ca) for making these requests in prominent areas of the web site.

The Communications Directorate will continue to do usability testing whenever the OPC's website is redesigned to ensure it is compliant with the current version of WCAG.

In addition, to foster an inclusive hiring process, the OPC has established unconscious bias pre-requisite training for managers with delegated staffing authority. Central agency inventories, pools and student placement programs for persons with disabilities are discussed and considered by hiring managers to meet their staffing needs.

The OPC has also instituted a Scent-Free Environment Directive which is shared with candidates, contractors, employees including new hires during the orientation session as well as visitors.

The OPC's internal news bulletin, "OPC Weekly," regularly features accessibility and inclusion training and awareness events, as well as promoting activities of the Canadian Congress on Disability Inclusion and Canada School of Public Service course offerings about accessibility.

The OPC also provides employees with specialized accessibility equipment as required based on the results of ergonomic assessments including, for example, curved screens, screen readers, screen magnification software, adjustable chairs and tables, as well as other ergonomic supplies and equipment. IM/IT also leverages technologies such as optical character readers to enable machine readable technologies or other types of accessibility requirements.

Finally, all employee and management performance management agreements include an organizational priority, with corresponding performance indicators, related to promoting and fostering diversity, equity, accessibility, inclusion and substantive equality of official languages within the OPC.

Principles

In keeping with the "nothing about us without us" guiding principle, this plan was developed in consultation with persons with disabilities and change agents within the OPC.

The sections below set out the planned activities identified by the OPC to achieve its 10 accessibility goals over the next 3 years, including activities that the OPC already performs to support accessibility for Canadians and its employees.

General

This information is provided for the purposes of providing feedback and for requesting alternate formats of the plan and/or feedback process.

Feedback Mechanisms

The Chief of Staff is designated to receive accessibility feedback and will coordinate with internal subject matter experts responsible for each of the seven priority areas to meet new obligations described under the ACA as required.

The OPC welcomes feedback from members of the public, employees and groups representing the interests of persons with disabilities on:

- The manner in which OPC is implementing its Accessibility Plan
- The barriers to accessibility encountered by OPC employees and persons interacting with OPC

Feedback may be provided to the OPC Chief of Staff (Person designated to receive feedback):

E-mail address: reception@priv.gc.ca

Toll free number: 1-800-282-1376

Telephone number: 819-994-5444

TTY line: 819-994-6591

Mailing address:
Accessibility Feedback – Chief of Staff
Office of the Privacy Commissioner of Canada
30, Victoria Street, Gatineau, Quebec, K1A 1H3

Acknowledgement of receipt will be provided in the same manner as the feedback was received, unless it is requested using a different channel or format. Feedback may be provided anonymously, in which case acknowledgement of receipt will not be issued.

This plan is a living document and will be updated regularly as new developments take place and feedback is taken into consideration.

Alternate Formats

The OPC will provide any information relating to its Accessibility Plan and/or feedback process in alternate formats available in print, large print, Braille, audio format (French and English) or electronic format that is compatible with adaptive technology that assists persons with

disabilities upon request. Requests for documentation in Braille or audio format must be fulfilled within 45 business days of the request. All other requests must be fulfilled within 15 business days.

Employment

Goal 1 – Create a culture of accessibility, where respect and inclusion are embedded in all aspects of the workplace and where all employees are empowered and supported to achieve their full potential.

	Supporting Actions	Lead	Target FY
1	Promote accessibility-related tools, resources and events, including promoting and encouraging participation in activities for the National AccessAbility Week.	All sectors Champions and Committees	Ongoing
2	Provide accessibility learning opportunities to employees, managers and functional specialists, including bolstering the OPC required training curriculum with additional mandatory and recommended training.	Corporate Management Sector (Human Resources)	2022-2023
3	Promote mechanisms for employees with disabilities to share experiences and raise concerns. This includes creating exit questionnaires to better identify workplace retention barriers and gaps, analyzing and acting on feedback received through the Employment Systems Review and 2022 Public Service Employment Survey.	All sectors	2023-2024

Goal 2 – Implement accessible practices to eliminate and prevent barriers to the recruitment, retention, and promotion of persons with disabilities.

	Supporting Actions	Lead	Target FY
1	Leverage interdepartmental accessibility groups to acquire tools and develop accessibility expertise in staffing.	Hiring managers Corporate Management Sector (Human Resources)	Ongoing
2	Review available workforce data to gain insight into gaps for persons with disabilities. This includes analyzing employee utilization rates, employee representation rates and drop-off rates at different stages of the selection process.	Business intelligence analyst Corporate Management Sector (Human Resources)	Ongoing
3	Promote talent management programs that facilitate the participation of persons with disabilities.	Corporate Management Sector (Human Resources)	Ongoing
4	Implement the GC Workplace Accessibility Passport to help facilitate and streamline conversations between employees with disabilities and managers about the tools, supports and measures they require to succeed in the workplace.	Hiring managers Corporate Management Sector (Human Resources)	2022-2023
5	Implement and promote the new self-identification questionnaire.	Corporate Management Sector (Human Resources)	2022-2023
6	Conduct an Employment Systems Review of internal policies and practices to identify systemic and attitudinal barriers to employment opportunities for persons with disabilities.	Corporate Management Sector (Human Resources)	2023-2024
7	Ensure onboarding practices are accessible. This includes reviewing and updating the OPC orientation program and checklist for new employees.	Hiring managers Corporate Management Sector (Human Resources)	2023-2024

The design and delivery of programs and services

The OPC has identified and published its services inventory in the Promotion and Compliance sectors as follows:

- [Respond to inquiries](#)

- [Business Advisory Services](#)
- [Media Relations](#)
- [Respond to requests for information from Parliamentarians](#)
- [Contributions Program of the Office of the Privacy Commissioner of Canada](#)
- [Privacy Impact Assessment (PIA) Reviews](#)
- [Consultation Services](#)
- [Investigate complaints under the Privacy Act](#)
- [Receive and review breach reports under Privacy Act](#)
- [Review and investigate complaints under PIPEDA](#)
- [Receive and review breach reports under PIPEDA](#)

The goals and related activities set out below represent the next steps that the OPC is undertaking to increase the accessibility of service management practices.

Goal 3 – Ensure that OPC employees are sufficiently equipped to deliver accessible programs and services.

Supporting Actions	Lead	Target FY
1 Ensure that training on soft skills such as unconscious bias and how to handle difficult situations is offered to public-facing staff to build awareness and understanding of persons with disabilities and accessibility issues.	All sectors	2023-2024
2 Dedicate more internal resources with lived accessibility experience to coaching staff on issues related to accessibility.	Corporate Management Sector (Human Resources)	2023-2024
3 Review the services inventory with an Accessibility Lens[1] and ensure this inventory is posted in the Government of Canada interactive data tool, [GC Infobase](#), in keeping with the Policy on Service and Digital.	Corporate Management Sector	2022-2023

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[1] An Accessibility Lens is a tool for identifying and clarifying issues affecting persons with disabilities used by policy and program developers and analysts to access and address the impact of initiatives (policies, programs or decisions) on persons with disabilities.

Goal 4 – Provide Canadians with barrier-free access to the OPC's programs and services.

	Supporting Actions	Lead	Target FY
1	Encourage the use of plain language for investigation reports and other OPC publications, such as guidance documents and interpretation bulletins.	Compliance Sector and Policy and Promotion Sector (Communications Directorate)	2022-2023
2	Conduct a study/survey to seek Canadians views on the accessibility of the OPC's programs and services.	Policy and Promotion Sector (Communications Directorate)	2023-2024
3	Retain an external resource to review and assess all OPC online forms, products and client touch points from an Accessibility Lens.	Policy and Promotion Sector (Communications Directorate)	2023-2024
4	Explore solutions identified to simplify, when possible, all online forms, products and client touch points to ensure accessibility and usability.	Policy and Promotion Sector (Communications Directorate) Compliance Sector Corporate Management Sector (IM/IT)	2024-2025
5	Monitor to ensure that identified solutions have the desired effect, or whether more accessibility features can be incorporated.	All sectors	2023-2024
6	Further enhance the accessibility of our website by letting users know they can request content in alternative formats and provide contact information for making these requests.	Policy and Promotion Sector (Communications Directorate)	2022-2023

The built environment

The built environment can have a material impact on health and wellbeing and, if optimized, can ensure that all employees and clients have equal and fair access to and use of internal infrastructure.

Goal 5 – Create a workplace free of physical barriers to improve the working environment for all OPC employees of various abilities.

	Supporting Actions	Lead	Target FY
1	Identify and implement workstations for persons with mobility impairment.	Corporate Management Sector (Administration group – accommodation)	2023-24
2	Review the OPC built environment against the requirements of the most current version of the National Standard of Canada accessible design for the built environment (CSA B651-18) and identify gaps.	Corporate Management Sector (Administration group – accommodation)	2024-25

Goal 6 – Ensure that all employees have a safe environment to work in.

	Supporting Actions	Lead	Target FY
1	Implement a buddy system for employees with disabilities in the context of hybrid work.	Corporate Management Sector (Administration group – safety & security)	2023-24
2	Document and review evacuation plans with employees with disabilities.	Corporate Management Sector (Administration group – safety & security)	2023-24
3	Ensure that smoke, fire and other emergency alarms have visual as well as auditory alerts.	Corporate Management Sector (Administration group – safety & security)	2024-25
4	Integrate an Accessibility Lens in the investigation of identified OSH safety issues.	Corporate Management Sector (Administration group – safety & security)	2024-25

Information and communications technology (ICT)

Central agencies and common service providers such as Shared Services Canada and PSPC set government standards for the acquisition of software and hardware for many products and services. Their leadership is essential in moving toward more accessible infrastructure.

Goal 7 – Provide accessible technology to ensure that all staff have access to the tools and platforms that they need to perform their work.

Supporting Actions	Lead	Target FY
1 Acquire technology with accessibility in mind.	Corporate Management Sector (Information Management and Information Technology)	2022-23
2 Adapt existing systems to make them accessible.	Corporate Management Sector (Information Management and Information Technology)	2023-25
3 Integrate validation for accessibility into the software development life cycle.	Corporate Management Sector (Information Management and Information Technology)	2022-23
4 Add accessibility to the compliance assessment for new non-standard software requests, which already incorporate cybersecurity and privacy assessments, as part of the non-standard software/service request procedure.	Corporate Management Sector (Information Management and Information Technology)	2022-23

Goal 8 – Acquire and implement technologies that ensure that all Canadians can access GoC programs and services.

	Supporting Actions	Lead	Target FY
1	Consult the Accessibility, Accommodation and Adaptive Computer Technology (AAACT) team on leading-edge technology and seek training opportunities provided by AAACT. Acquisitions will be undertaken if cost benefit analysis warrants.	Corporate Management Sector (Information Management and Information Technology)	2023-24
2	Consult and join communities of practice through Government of Canada's collaboration platforms to identify best practices and share lessons learned on complying with ICT accessibility requirements.	Corporate Management Sector (Information Management and Information Technology)	2022-23
3	Assist other sectors as required if Canadians require technological assistance with filling out mandatory forms and using OPC services.	Corporate Management Sector (Information Management and Information Technology)	2022-23

Communications, other than ICT

The GoC community of practice indicates that communications is a system for transmitting or exchanging information, and that performance indicators are under development for accessible communications.

Government accessibility guidance suggests web material should be written to a grade 6 to 8 level. Consideration could be given to a plain language review of the current content for individuals requiring assistance in understanding and acting upon their privacy rights.

Goal 9 – Ensure that OPC communications products are developed within an "accessibility by design" culture, where staff at all levels are aware of accessibility requirements.

	Supporting Actions	Lead	Target FY
1	Encourage front line staff to include plain language training in their learning plans, and to follow the plain language process.	All sectors	Ongoing
2	Ensure that current employees and future hires are knowledgeable about GoC guidelines for usability and accessibility of content.	All sectors	Ongoing
3	Continue to ensure that the OPC website is accessible through ongoing compliance with WCAG and the Standard on Web Accessibility.	Policy and Promotion Sector (Communications Directorate)	Ongoing
4	Explore methods of offering additional help to Canadians when filling out forms required to access OPC services.	All sectors	Ongoing

Goal 10 – Share knowledge and best practices widely in order to reduce barriers across the public service.

	Supporting Actions	Lead	Target FY
1	Develop explanations and examples for inclusion in the reference guide.	Policy and Promotion Sector (Communications Directorate)	2022-23
2	Finalize the plain language reference guide and checklist for authors and disseminate to other sectors.	Policy and Promotion Sector (Communications Directorate)	2022-23
3	Share accessible communications knowledge with other OPC sectors and other GoC departments and agencies by offering awareness sessions and a style guide that covers accessibility issues.	Policy and Promotion Sector (Communications Directorate)	2023-2024

The procurement of goods, services and facilities

The OPC has entered into a Memorandum of Agreement with the Canadian Human Rights Commission (CHRC) for the OPC's procurement-related activities. As the contracting authority for the OPC, the CHRC will ensure that procurement-related activities conducted on behalf of the OPC comply with all legal and policy requirements, including the ACA. Accessibility

requirements will be part of the procurement process from the outset. More information on the OPC's procurement-related activities and how these activities meet the requirements of the ACA can be found in the CHRC's accessibility plan.

Transportation

This section is not applicable to the OPC.

Consultations—Methodology

This accessibility plan aims to provide a path forward for the OPC to eliminate barriers and adapt to changing demographics and will be updated as new initiatives are introduced. It is a priority for our office to bring improvements in the work lives of OPC employees with disabilities and to improve services to the public.

This plan was prepared by first completing an environmental scan to ensure understanding of central agencies' and other government departments' accessibility initiatives and to review existing related policies and procedures. The exercise helped identify existing practices and initiatives that could be adopted as a best practice across the organization.

Employees who were interested in being part of a working group were identified to ensure the approach in the preparation of this plan respected the "nothing about us without us" principle. This was done through an employee call out in the internal weekly newsletter and consultation with employees through the EDI committee, the Wellness Action Team (WAT) committee and sector representatives. For Privacy reasons, employees that contributed to the exercise were not asked to identify if they lived with a disability or not. This process led to the creation of a draft plan in summer 2022 which included a list of proposed actions to address accessibility barriers at the OPC.

To finalize this plan in a consultative manner, the OPC identified select accessibility representatives in each sector to contribute to the redaction of the final accessibility plan. The representatives met over fall 2022 to review the proposed activities and to restructure the plan in more articulate, concrete and meaningful goals. This led to the preparation of a draft version of the plan ready for external consultation.

The OPC does not currently have a network of stakeholders in all the abilities community. When exploring consultation options, it was felt by the members of the Accessibility Plan working group that an online consultation on the OPC web site would not lead to a meaningful consultation process. In order to receive meaningful feedback, it retained the services of Excellence Canada, an independent, not-for-profit corporation that is dedicated to advancing organizational performance across Canada, to review its accessibility plan for compliance with the Accessible Canada Act and submit the plan to its Accessible Canada Act Review Committee to complete a review of the draft from the perspective of people with disabilities.

The consultation was conducted between November 1 and November 14, 2022. The three members of the Accessible Canada Act Review Committee have a disability/lived experience with mobility disability and learning disability. They were asked to review the overall readability and structure of the plan, and the contents of the plan given their lived experiences with disabilities.

The comments received were useful in identifying government language that decreased the readability of the document. It also helped bring attention to the OPC that some of the plan activities should clearly state that they will be completed with people with disabilities, and not only by keeping people with disabilities in mind.

Structural comments and next step recommendations received were integrated in the final plan.