



Office of the Public Sector  
Integrity Commissioner  
of Canada

Commissariat à l'intégrité  
du secteur public  
du Canada

# Accessibility Progress Report (2023)

**Office of the Public Sector Integrity  
Commissioner of Canada**

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## General

We invite employees and other persons who have dealt with the Office of the Public Sector Integrity Commissioner of Canada (PSIC) to provide accessibility-related feedback using the contact information below. You may include your contact information to receive an acknowledgment or share your feedback anonymously. The Accessibility Representative is the person designated to receive feedback.

You may also use the contact information below to request a copy of the accessibility plan in alternate formats (print, large print, Braille, audio format or electronic format).

Email: [accessible@psic-ispc.gc.ca](mailto:accessible@psic-ispc.gc.ca)

Telephone:

- 613-941-6400
- 1-866-941-6400 (toll-free in Canada)

In-person or by mail:

Accessibility Representative  
Office of the Public Sector Integrity Commissioner of Canada  
60 Queen Street, 4<sup>th</sup> Floor  
Ottawa, Ontario K1P 5Y7

## From the Commissioner

I am pleased to present PSIC's Accessibility Progress Report (2023) prepared in accordance with the *Accessible Canada Act*.

The objectives and supporting actions found in our 2022-2025 Accessibility Plan were identified through a comprehensive review of PSIC's internal and external activities, research on best practices, a scan of existing Government of Canada policies and standards, and consultations with employees and persons with disabilities. We placed particular emphasis on accessibility awareness, workplace accommodations, the built environment, and website accessibility.

In this report, we detail the progress we have made over the past twelve months towards achieving our objectives and completing the supporting actions included in the Accessibility Plan. To maximize transparency, we have included all the objectives and supporting actions included in our Accessibility Plan and supplemented this original text with "progress" boxes. We have also indicated where a supporting action has been completed, is currently in progress, or has been planned for a particular year.

I look forward to continuing to implement the Accessibility Plan and reporting on our progress next year.

## Consultations

During the preparation of our 2022-2023 Accessibility Plan, we consulted employees with disabilities and, given that our website is the primary means by which most disclosers or complainants find information about PSIC's services and access these services, we also conducted targeted external consultations with persons who have visual impairments and rely on screen-reader technology.

When preparing this Progress Report, we decided to conduct internal consultations who self-identify as persons with disabilities. Given that PSIC is a micro-organization with approximately 40 employees, the specific number of employees who participated in these consultations is purposefully omitted from this Progress Report.

## Feedback

PSIC received very limited accessibility-related feedback this year. We received a handful of requests to obtain forms in alternate formats, which were all granted. One visually impaired client advised PSIC that they had difficulty using the disclosure web form with their screen reader and requested that the form be provided in Microsoft Word; the client was able to submit their disclosure form in this manner.

Another client indicated in various emails that they had encountered "accessibility issues" in the disclosure process. However, given that they declined to participate in the numerous follow-ups made by the Accessibility Representative, PSIC unfortunately did not obtain any information regarding the nature of the issues encountered by the client.

## Priority Areas

In our 2022-2023 Accessibility Plan, we identified objectives and actions to improve accessibility in eight priority areas: culture; employment; built environment; procurement of goods, services and facilities; information and communication technologies; communication, other than information and communication technologies; design and delivery of programs and services; and transportation.

We included culture as a priority area, although it is not required by the Accessible Canada Act, as it is foundational to improving accessibility.

## Culture

As explained in our Accessibility Plan, our overarching objective is to foster a culture of inclusion and equity at PSIC for the benefit of employees and external stakeholders. In support of this objective, we focused on the following:

- Raising accessibility awareness so that we can proactively identify, remove, and prevent barriers for employees and external stakeholders;
- Recognizing attitudinal barriers and uncovering unconscious biases, as these may exacerbate other barriers by discouraging persons with disabilities from expressing their needs; and,
- Actively soliciting feedback from persons with disabilities so that we are informed and guided by their lived experiences. Our consultations on the Accessibility Plan revealed that this is not only an effective means of identifying barriers and solutions, but it also has the potential to build trust and a sense of belonging if feedback is meaningfully considered.

**Objective A: PSIC encourages employees to develop their accessibility awareness, recognize attitudinal barriers, and uncover unconscious biases.**

### Supporting Actions

- Include an accessibility training requirement into all employees' annual requirements, which incorporates training related to attitudinal barriers and unconscious biases. **(Planned for FY 2024-2025)**
- Maintain an Intranet page on accessibility that provides various resources, including a list of general and specialized accessibility training. **(Completed 2023)**
- Leverage learning events hosted by the Mental Health Committee to raise awareness of mental health disabilities among employees.

### Progress

- We have developed an Intranet page on accessibility that provides various resources, including a list of general and specialized accessibility training.
- Given that PSIC was in a transition period with the arrival of a new Commissioner, our Mental Health Committee organized learning events connected to resiliency and change management. The Committee therefore did not organize events relating to mental health disabilities this year.



**Objective B: PSIC actively solicits feedback from persons with disabilities, whether they are employees or external stakeholders, and feedback is meaningfully considered.**

Supporting Actions

- Solicit accessibility-related feedback from external stakeholders (i.e. disclosers, complainants, etc...) by providing information about the feedback process established in accordance with the Accessible Canada Act. **(Completed 2023 and Ongoing)**
- Invite employees to use the feedback process established in accordance with the Accessible Canada Act, and provide details regarding how they can provide feedback anonymously. **(Completed 2023 and Ongoing)**
- Report to the Executive Committee on accessibility-related feedback at least bi-annually. **(Completed 2023 and Ongoing)**

Progress

- We completed all the actions in support of this objective in 2023. Notably, we modified our internal process such that disclosers, complainants, and individuals requesting legal assistance receive information regarding the feedback process and how they can make accommodation requests when their form has been received by PSIC. This information will now be found in the confirmation email which provides external stakeholders with their file number.
- We will continue to invite employees to use the feedback process and to report to the Executive Committee on accessibility-related feedback at least bi-annually.

## Employment

PSIC is committed to fostering a more inclusive and diverse workplace by implementing strategies to identify, remove, and prevent barriers in recruitment, retention and promotion of persons with disabilities.

The specific objectives and supporting actions outlined below are guided by information gathered during PSIC's internal consultations and consultations conducted by the Treasury Board of Canada when developing the Accessibility Strategy for the Public Service of Canada, as well as the Public Service Commission's Audit of Employment Equity Representation in Recruitment.

We found during internal consultations that employees would be reluctant to make accommodation requests and that employees with disabilities consider the process unnecessarily intrusive. These concerns seemed to be grounded in a general unease rather than specific experiences at PSIC. Employees and management showed great

interest in the Workplace Accessibility Passport established by the Treasury Board of Canada.

**Objective A: Employees and candidates consider that the workplace accommodations process is respectful and efficient, and that it meets their needs as much as possible.**

Supporting Actions

- Pilot the Workplace Accessibility Passport as a communication tool for employees and managers to exchange accommodation-related information.
- Include an accommodation-related training requirement into all managers' performance agreements. **(Planned for 2024-2025)**
- Consider establishing a workplace accommodation policy that sets out which member(s) of the management team an employee should approach with an accommodation request and includes a mechanism to track accommodation-related information (number of requests; rejected/refused requests; accommodation type; formal assessments by a medical doctor or specialist; cost; number of days between the request and full implementation of accommodation). **(Planned for consideration in 2025)**

Progress

- Our intent is to launch the pilot of the Workplace Accessibility Passport in 2024. We are currently completing all preparation, including briefing managers, preparing documentation to brief staff, and developing the internal procedure if an employee wishes to use the Workplace Accessibility Passport.
- We decided to consider establishing the workplace accommodation policy once the pilot of the Workplace Accessibility Passport has been completed. This will ensure that any policy reflects whether PSIC uses the Workplace Accessibility Passport.

**Objective B: PSIC is proactive about the recruitment and retention of persons with disabilities.**

Supporting Actions

- Explore hiring students with disabilities through the Federal Student Work Experience Program, Federal Internship Program for Canadians with Disabilities, or similar programs. **(Completed 2023 and Ongoing)**
- Develop incentives, such as flexible work arrangements and work-sharing opportunities, to support the recruitment and retention of employees with disabilities.

- Monitor development of standards by Accessibility Standards Canada regarding employment, as this has been identified as a priority area by that organization. **(Completed 2023 and Ongoing)**

Progress

- We will continue to explore hiring students with disabilities and offer flexible work arrangements for employees, including employees with disabilities.
- We have expressed an interest in participating in the persons with disabilities candidates inventory organized by Health Canada and two designated managers will attend an information session hosted by Health Canada in December 2023.
- While not connected to a supporting action included above, we have continued to be responsive to employees' accommodation requests and we have proactively suggested modifications to the workplace with the goal of removing and preventing barriers potentially faced by certain employees.

## Built Environment

PSIC recognizes that, in accordance with the Directive on the Management of Real Property, it is responsible for providing barrier-free access to its offices. We are committed to meeting the requirements of this standard and to proactively identifying and removing other barriers in the built environment.

During internal consultations, employees with disabilities identified certain barriers related to the built environment. These have been listed as high priority issues below.

### **Objective A: High priority accessibility issues identified during internal consultations are addressed as quickly as possible.**

#### Supporting Actions

- Address accessibility of PSIC's main entrance doors and bathroom doors. **(In Progress)**
- Ensure that all current emergency evacuation procedures enable the safe and efficient evacuation of persons with disabilities, including persons with mobility, auditory and/or visual impairments. **(In Progress)**
- Establish a quiet, closed-door space with adjustable lighting that employees without a closed-door office can reserve.

Progress

- We are currently preparing procurement documentation required to address the accessibility of PSIC's main entrance and bathroom doors.
- We reviewed our internal emergency evacuation procedures and are cooperating with the primary tenant of the building as they are responsible for building-wide emergency

evacuation procedures. These were practiced during multiple exercises this year.

**Objective B: PSIC's offices are accessible to employees and external stakeholders.**

Supporting Actions

- Monitor the development of standards by Accessibility Standards Canada regarding emergency egress, as this has been identified as a priority area by that organization. **(Completed 2023 and Ongoing)**
- In consultation with persons with disabilities, conduct an accessibility audit of PSIC's offices to ensure compliance with the Directive on the Management of Real Property.

**Procurement of Goods, Services and Facilities**

PSIC is committed to ensuring that any goods, services or facilities that it procures are inclusive by design and accessible by default. We also recognize that, in accordance with the Directive on the Management of Procurement, we must consider accessibility criteria and features when procuring goods or services.

No barriers relating to the procurement of goods, services and facilities were identified during consultations.

**Objective A: PSIC implements practices to ensure that goods, services and facilities procured are accessible.**

Supporting Actions

- Consider incorporating standard accessibility language developed by the Accessibility, Accommodation and Adaptive Computer Technology (AACT) program at Shared Services Canada into procurement templates. **(In Progress)**
- Clearly define and identify accessibility requirements in tenders, requests for proposals and contracts. **(Completed 2023 and Ongoing)**
- Monitor the development of standards by Accessibility Standards Canada regarding procurement, as this has been identified as a priority area by that organization. **(Completed 2023 and Ongoing)**

**Information and Communication Technologies**

Given that PSIC's website is the primary means by which most disclosers or complainants find information about PSIC's services and access these services, we have decided to focus on website accessibility under this priority area.

As required by the Standard on Web Accessibility, PSIC has worked with its external web developer to ensure that its public-facing website meets Level AA conformance with the Web Content Accessibility Guidelines (WCAG 2.0). Nonetheless, as explained in the Consultations section above, persons with disabilities who rely on screen-reader technology identified certain accessibility-related issues with PSIC's website.

Furthermore, employees noted during internal consultations that PSIC's general inquiry line does not support teletypewriter (TTY) technology.

**Objective A: PSIC's current website is accessible to persons with disabilities, including those who rely on screen-reader technology.**

Supporting Actions

- Compile a list of accessibility issues identified during external consultations and address these issues as quickly as possible (i.e. use of headings and lists, descriptive text is used for links, links are properly labelled, issues with the cookies banner so that all content can be accessed). **(In Progress)**
- Include an accessibility statement on PSIC's website. **(In Progress)**
- Continue to provide sign-language translation of videos in ASL and LSQ. **(Completed 2023 and Ongoing)**
- Closely monitor for revised guidance on website accessibility from Treasury Board Secretariat and monitor the development of standards by Accessibility Standards Canada regarding website accessibility. **(Completed 2023 and Ongoing)**

Progress

- We have continued to provide sign-language translation of case report videos in ASL and LSQ.
- We have addressed many of the accessibility issues identified during the external consultations conducted when preparing the 2022-2025 Accessibility Plan, including the most significant issue (cookie pop-up). However, given that some issues identified were not found by screen reader users to affect the usability of the site, we have decided to address them in the website redesign.

**Objective B: Incorporate accessibility into PSIC's planned website redesign.**

Supporting Actions

- Research best practices with respect to accessible information and communication technology procurement, including guidance prepared by the Accessibility, Accommodation and Adaptive Computer Technology (AACT) program at Shared Services Canada. **(Completed 2023)**

- Ensure that accessibility requirements are clearly defined and identified in procurement documents relating to the website redesign, including requirements relating technical compliance with specified standards and user testing. **(In Progress)**
- Research best practices with respect to accessible web design, including use of plain language, logical flow, alternative text with images, font considerations (i.e. size and contrast), and colour contrasting. Incorporate these best practices into the website redesign. **(Completed 2023)**

Progress

- Our communications team has conducted research regarding accessible web design to ensure that PSIC's new website is accessible to all stakeholders, including persons with disabilities. The communications team has also worked diligently to ensure that procurement documents clearly define and identify applicable accessibility requirements.

**Objective C: External stakeholders can use the general inquiry line to communicate with PSIC.**

Supporting Action

- Ensure that the general inquiry line supports teletypewriter (TTY) technology.

**Communication, Other than Information and Communication Technologies**

PSIC produces a significant volume of written documentation in relation to disclosures and reprisal complaints, including decision letters, investigation reports, and report summaries. We are committed to encouraging the use of plain language as much as possible, while meeting applicable legal requirements. However, employees noted during internal consultations that use of complex or legalistic language is a potential barrier.

Furthermore, PSIC produces outreach documentation that may not be accessible to persons with disabilities, and employees participate in outreach events. We are committed to ensuring that all public servants, regardless of ability, have access to information about our services.

**Objective A: The use of plain language is encouraged for all types of written documentation, including documentation relating to disclosures and complaints, internal documentation, and outreach documentation.**

Supporting Actions

- Monitor the development of standards by Accessibility Standards Canada regarding plain language, as this has been identified as a priority area by that organization. **(Completed 2023 and Ongoing)**
- Research best practices regarding the use of plain language and develop specialized guidance for employees involved in case admissibility analyses, investigations and communications.

#### Progress

- We have not yet developed specialized guidance on plain language. However, we strive to use clear language to express relatively complex analyses in decisions and investigation reports. To ensure that a broad range of Canadians can understand the Commissioner's findings and recommendation, PSIC uses the simplest language possible in its case reports to Parliament and publishes short videos that summarize case reports.

#### **Objective B: PSIC documentation is prepared in accessible formats.**

##### Supporting Actions

- Conduct an accessibility review of current internal and external templates to ensure they are accessible.
- Conduct an accessibility review of current outreach documentation to ensure all products are accessible.
- Continue to provide documentation in alternate formats on request (large print or electronic format). **(Completed 2023 and Ongoing)**

#### Design and Delivery of Programs and Services

PSIC investigates wrongdoing in the federal public sector and helps protect from reprisal whistleblowers and those who participate in investigations. Through its activities, PSIC regularly interacts with disclosers, reprisal complainants, reprisal respondents and witnesses, some of whom are persons with disabilities.

Employees stated during internal consultations that PSIC generally grants any accommodation requests received by persons involved in disclosures or reprisal complaints, but that it does not proactively offer the opportunity to make requests. Some employees also stated that lack of training on how to interact with individuals who have mental health disabilities may cause barriers.

#### **Objective A: The disclosure and complaints processes are accessible to persons with disabilities.**

##### Supporting Actions

- Modify the disclosure forms, reprisal complaint forms, forms to request funding for legal advice, and interview invitation letters to offer persons the opportunity to make accommodation requests. **(Completed 2023)**
- Research existing training programs on interacting with persons with disabilities and include them on the Intranet page on accessibility.

#### Progress

- As noted above, we modified our internal process such that disclosers, complainants, and individuals requesting legal assistance receive information regarding the feedback process and how they can make accommodation requests when their form has been received by PSIC. This information will now be found in the confirmation email which provides external stakeholders with their file number.

## Transportation

No barriers relating to transportation were identified during consultations. Nonetheless, PSIC has identified one objective and one action in support of its commitment to ensuring that employees do not face barriers when travelling for work.

**Objective A: PSIC employees are aware that transportation service providers have accessibility-related obligations and make accommodation requests as needed when travelling for work.**

#### Supporting Action

- Inform employees on the Intranet page on travel that they can make accommodation requests directly with transportation service providers as needed. **(Completed 2023)**