



Canada Energy
Regulator

Régie de l'énergie
du Canada

Canada Energy Regulator Accessibility Plan 2023-25



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General

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Background: The Accessible Canada Act (ACA)

The ACA was given Royal Assent in June 2019, with the purpose of making Canada barrier-free for persons with disabilities by January 1, 2040. This involves identifying, removing, and preventing barriers in federal jurisdiction in the following Priority Areas:

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

A key requirement of the ACA is for organizations under federal responsibility to prepare Accessibility Plans that describe how they will identify, remove, and prevent barriers in the Priority Areas identified above.

The *Act* defines a *Barrier* as the following:

“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.”

The *Act* defines a *Disability* as the following:

“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.”

Message from CEO

The CER regulates infrastructure to keep energy moving safely across the country. We review energy development projects and share energy information, all while enforcing some of the strictest safety and environmental standards in the world.

This work is led by the CER's expert staff coast-to-coast-to-coast, working in a hybrid work environment. The CER is poised to tackle the opportunities of the 2023-24 fiscal year, leveraging the technologies and virtual efficiencies we have adopted since the pandemic began, while balancing this with purposeful opportunities for our staff to connect and collaborate in the CER's offices across the country. We are designing a new way of working that supports the organizational culture we want to achieve – a culture founded in equity and inclusion.

As a lifecycle regulator, we work hard every day on behalf of all Canadians to ensure that energy infrastructure is designed and operated to the highest standards. Our commitment to safety is steadfast, and our plan for the coming year remains rooted in the cross organizational areas of focus and improvement set out in the CER's three-year Strategic Plan with its bold vision and four Strategic Priorities: Trust and Confidence, Reconciliation, Competitiveness, and Data and Digital Innovation.

These priorities provide additional focus as we deliver on our core responsibilities of safety and environmental oversight; energy adjudication; energy information; and engagement.

This is the CER's inaugural Accessibility Plan 2023-2025 (Plan), created in compliance with the *Accessible Canada Act*. It is the product of several months of consultations with staff, as well as research into barriers to accessibility, and the identification of potential solutions to those barriers.

The work reflected in this plan builds on changes currently underway at the CER to update policies, programs, practices, and services to create a more inclusive environment for everyone, and a more accessible one for persons with disabilities.

The Plan is a key part of the work to improve diversity and inclusion at the CER, as well as our strategic priority to increase trust and confidence in the CER as a regulator and as an employer of choice. The Plan aligns with the implementation of the CER's Diversity and Belonging Roadmap, and commitments identified in the [Employment Equity, Diversity and Inclusion Plan for 2021-2024](#), which are provided to Parliament on an annual basis.

The CER fully supports the Government of Canada's goal to create a barrier-free Canada by 2040 – which includes identifying, removing, and preventing barriers to accessibility in the federal jurisdiction.

We look forward to receiving input on the Plan – feedback is invited and welcome, as it helps us continually improve and target our efforts to create a barrier-free CER.

Gitane De Silva
Chief Executive Officer
Canada Energy Regulator

Executive summary

The sections of the Plan reflect the seven Priority Areas identified in the ACA. Each section includes a discussion of the issues as they relate to that Priority Area at the CER.

The approach to developing the Plan is grounded in significant work undertaken by the CER to develop its Diversity and Belonging Roadmap (Roadmap), which was adopted by the CER in 2022. The Roadmap provides the organization with a plan to be more inclusive, equitable and where everyone thrives.

The Plan itself takes a measured approach, by taking stock of initiatives currently underway and planned, and by identifying areas for action that will help inform ongoing work, longer term plans, and continued improvement initiatives. By doing so, actions have been prioritized so that the Plan is both achievable and realistic, and that our efforts are aligned across the organization. There is a good deal of work underway; and a good deal more that could be done.

The consultations undertaken to inform the Plan were primarily internal, focused on staff and their experiences within the CER. A focus for future planning will be incorporating engagement externally with Canadians on improvements to our accessibility initiatives.

The focus for 2023 will be on:

- incorporating accessibility considerations as part of our hybrid workplace, including conducting accessibility assessments as part of the hybrid approach,
- continuation of general and targeted training on accessibility, and
- inclusion of accessibility considerations in updated policies and processes.

In the coming year, the CER will also consider feedback it receives on the Plan, with a focus on continuous improvement towards a barrier free Canada by 2040.

Introduction

The development of the Plan aligned with the CER's current work to create a more equitable organization with a more representative and inclusive workforce.

The CER Diversity and Inclusion Committee analyzed the 2019 Public Service Employee Survey (PSES) data and found gaps between the employment equity groups¹ – which includes persons with disabilities – and their colleagues. This information was considered in the development of several measures to address experiences of harassment and discrimination, levels of job satisfaction, accommodations for individuals and groups with disabilities, and trust in leadership.

In 2020, CER's Strategic Plan identified four strategic priorities, one of which is Trust and Confidence: fostering trust and confidence of Canadians in the CER through robust communications, transparency, collaboration, and inclusive engagement; building respectful relationships with the Indigenous peoples; and fostering an engaged and empowered workforce. The CER aims to ensure that its workforce is representative of the diversity of the Canadian population, and that it adapts to and reflects the realities of a more flexible, supportive, inclusive, and adaptive workplace during and post-pandemic.

In April 2021, the CER established a Diversity and Belonging Team. This team consulted extensively internally and externally, and worked with external experts to develop an organization-wide Diversity and Belonging Roadmap. The Roadmap sets out recommendations and key deliverables toward improving inclusion and equity within the CER, including for persons with disabilities. Full-time positions at the CER were staffed in the fall of 2022 dedicated to implementing the Diversity and Belonging Roadmap.

The CER's [Employment Equity Report for 2020-21](#) indicates that employment gaps remain for persons with disabilities. The [Employment Equity Plan](#), included in the Report, identifies some of the important steps that the CER can take to address these gaps.

¹ Defined as those who are Women, Aboriginal (or Indigenous) Peoples, Visible Minorities, or Persons with Disabilities

Consultations

An organizational culture that supports persons with disabilities requires awareness, empathy and understanding from all employees. In support of this, the CER conducted an accessibility awareness and understanding campaign starting in summer 2021 continuing through to early 2022. This included information sessions with Business Units, teams, and other CER groups, as well as Lunch and Learns as an open forum for all staff participation.

The awareness and sensitization campaign shifted to more targeted consultations in early 2022. These were held with specific internal groups who have insights into barriers to accessibility and potential solutions that might be made available at the CER. These sessions continued through summer 2022. The CER's Indigenous Employee Circle was included in this consultation, in recognition of the intersections between culture and disability, and to understand how people experience disabilities in different ways.

This consultation also included regular attendance at the CER's Persons with Disabilities committee to gather greater insight into accessibility issues and concerns.

The CER recognizes that not everyone with a disability is willing or able to take part in supporting employee networks such as the Persons with Disabilities committee. In spring 2022, the organization conducted an internal survey to gather anonymous feedback from all employees, which encouraged participation from those living with a disability, and their allies, to gather additional information on the sorts of barriers that exist².

A compendium of comments received during consultations, and the survey results, were released internally to all staff as a discussion document. Staff were again offered the opportunity to respond, including an option to do so anonymously. Responses indicated that there is interest in accessibility issues, and staff were able to provide helpful insights.

In the summer of 2022, a series of seminars were held with CER employees with disabilities, allies, and subject matter experts for each of the Priority Areas identified under the ACA. These seminars were intended to round out the exploration of some of the identified barriers, work underway to close the barrier gaps, and potential dialogue about other solutions to date.

2 CER is grateful to the Public Prosecution Service of Canada for sharing its internally developed survey.

Summary of Consultations

Consultations with staff determined three main barriers to accessibility at the CER which reflect the ACA's Priority Areas: (A) empathy and understanding of accessibility issues, (B) fuller assessment of the organization's accessibility, and (C) organizational support.

A. Empathy and understanding

Knowledge and understanding refers to the general lack of knowledge, understanding and awareness of accessibility and accessibility issues. This includes gaps in knowledge of legal requirements, rights, and obligations, and available supports for both staff and external stakeholders/partners. The CER regularly reviews and updates its learning and development activities to support training opportunities related to employment equity, diversity, and inclusion (e.g., unconscious bias, accommodation, anti-racism, cultural competency, etc.).

B. Building on accessibility assessments

Feedback received during the internal consultations, as well as other data related to the development of the Diversity and Belonging Roadmap, indicate that barriers to accessibility exist, but have never been properly identified. This includes barriers in the CER's policies, programs, practices, services and/or facilities.

The CER began a multi-year review of its Human Resource policies in early 2022. Policies are being assessed from equity, diversity, inclusion and Gender-based Analysis Plus (GBA Plus) perspectives, which includes accessibility. This review will position the organization to better address barriers to accessibility.

C. Organizational support

A frequent theme encountered during consultations related to frustration with the lack of organizational support for persons with disabilities. While various people or business units have responsibility for aspects of accessibility services within the CER, there is no single resource available for employees who seek support or advice on accessibility issues. This was identified by staff as an opportunity for improvement and will be considered in the context of future operational and program planning.

As noted, the CER has a Persons with Disabilities Committee, which provides advice and support to persons with disabilities, and increases awareness of accessibility issues across the organization. As part of its work to support diversity and belonging, the CER is reviewing its committee governance structures, including ways to better support corporate citizenship committees. The CER continues to review and consider options for a more formalized corporate citizenship accountability and time code entries to reflect staff time worked in support of these initiatives, all of which contribute to an improved and positive organizational culture.

The CER's [Employment Equity Plan](#) committed to including leadership performance management accountabilities related to equity, diversity, and inclusion for all managers. This would take the important step of formalizing accessibility accountabilities into managers' day to day work. As a result, at the CER, all leaders (managers with supervisory responsibilities at the Director level and above) now have a clear and focused accountability in their performance agreements related to diversity and belonging:

"Promote Diversity and Belonging: Enhance understanding and awareness of equity, diversity, inclusion, and belonging within the workplace, and demonstrate commitment to learning, individually and as part of the leadership team."

Priority Area One: Employment

The [Government of Canada's Accessibility Strategy](#) requires departments and agencies, including the CER, to pursue targeted recruitment initiatives to support the commitment to hire 5,000 net new people with disabilities by 2025 across the Government of Canada. The commitments in this section will help the CER achieve its portion of that target.

The CER's [Employment Equity Report 2020-21](#) noted that approximately 3.3% of CER employees identify as having a disability, which is 5.5 percentage points less than the workforce availability of 8.8%. These numbers reflect an underrepresentation of persons with disabilities across the core federal public administration.³ Of note, there was a change in 2018-19 to how Statistics Canada established the benchmarks to measure employment equity for the public service. The one for persons with disabilities has more than doubled as a result of new questions to screen for disabilities in the 2017 Canadian Survey on Disability and 2016 Census to better reflect the number of persons with a variety of disabilities available in the workforce. In 2016-17, and in 2017-18, the CER's population was about equal to, or greater than, workforce availability. In 2018-19, the CER's representative population was about the same as the year previously, but less than half of the revised workforce availability. Closer analyses of employment equity data showed that this gap at the CER is most pronounced in the professional and supervisor positions, and in administrative personnel.

This data, taken in the context of the consultations during the preparation of this Plan, supports the conclusion that there remain systemic barriers to employment for persons with disabilities at the CER, as well as issues related to individuals self-identifying as being a person with a disability. The data itself is enlightening, especially as the CER understands that persons with disabilities are likely to underreport their status as part of self-identification processes. The Human Resource policy review, noted earlier, is an important step to understanding and removing the barriers that may exist in this critical set of policies. As well, the CER is also working on several voluntary self-identification opportunities and initiatives to assist with data gathering and reporting improvements.

Some of these representation gaps can be traced to systemic barriers within the broader Canadian workforce. For example, some persons with disabilities have had greater difficulty entering the workforce, or having access to educational opportunities, which could mean that they would not meet minimum hiring criteria. Some individuals may not have had the same access to networking or bridging opportunities for employment, or they may not be in a position to access more traditional recruitment or selection pathways.

To address this latter issue, the Government of Canada has programs that support recruitment of students with disabilities directly from universities. A barrier identified during staff consultations is that CER hiring managers may not always be aware of these programs. The CER could consider leveraging these employment programs and supports, including promoting programs such as the [Employment Opportunity for Students with Disabilities program](#) among its hiring managers.

3 The Public Service Commission's [Audit of Employment Equity Representation in Recruitment](#) found the representation gap in 2018-19 to be 3.8% across the greater public administration (5.2% representation versus as workforce availability of 9.0%).

As noted, the CER is already reviewing its Human Resource policies from equity, diversity, and inclusion perspectives. Once updated, these policies should help remove barriers to accessibility in the employment area. Further work could also include the establishment of minimum hiring targets and developing specific plans to increase representation of persons with disabilities in particular job families or operational areas.

The ability to track gaps in representation, and to establish baselines, set goals, and track progress begins with good data collection. Understanding where persons with disabilities tend to be screened out during the hiring process can potentially inform the CER where barriers to its hiring practices may exist. This understanding can help to set baseline goals and measures to further improve representation. The CER's [Employment Equity Plan](#) notes the importance of analyzing the recruitment, promotions, and departure rates of all designated group members, including persons with disabilities. By building on this, the CER would be able to begin to identify potential strategies to address under-representation.

Persons with disabilities frequently cited frustration with accommodations processes. Broadly speaking, barriers to accommodations at the CER relate to unclear processes and long wait times. There was also a sense of a lack of support for employees navigating the accommodation process. In its [Employment Equity Plan](#), the CER plans to work to improve this through better communication with employees on accessibility and accommodations, and to better support managers and leaders with information as to understanding their accountabilities – enabling them to prepare and appropriately and effectively support accommodations processes and requirements.

Beginning at the job applications stage, the CER offers accommodation to all applicants. However, of those successful applicants to the CER who were inclined to ask for an accommodation at the application stage, some felt hesitant to request an accommodation because they believed that it would negatively affect their continuation in the process, or that it would introduce a prejudice against their candidacy.

Such fears represent a barrier to persons with disabilities seeking employment at the CER. Applicants – especially those from outside the public service – may not know what accommodations the CER offers job applicants. They may not know what their rights are with respect to accommodations or be assured that their request for an accommodation would have no impact on their candidacy. Similarly, hiring managers may not be aware of their obligations, or how to proceed when a request for an accommodation is made by a candidate.

The review of the CER's recruitment processes and templates – part of the Human Resource policy review – can help ensure that accommodations processes are clearly communicated to candidates at the application stage. Improved training, including for hiring managers on accessibility recruitment, assessment, selection, onboarding, and accommodations for persons with disabilities can also help address this.

Within the workplace, the CER's accommodations policy requires employees seeking an accommodation to first speak to their manager. However, this step can present uncertainty, and could be viewed as a barrier itself.

Employees often do not know their rights or management's obligations to provide accommodations. It may be difficult or even traumatic to raise a personal issue with a manager, out of fear of being met with a negative reaction or a lack of understanding, empathy, or of creating a long-term prejudice against them. In such situations, disclosing a disability may feel

like a high-risk step with potentially very little reward. The risks may be felt even more by employees who are on term contracts, or work term students, who hope to continue or extend their employment. Some employees have shared that even though they have discussed their accommodation needs with their manager, they may at some point also be required to repeat the accommodation process if either they or their manager change positions.

Some employees may be willing to present their accommodation needs but feel they have nowhere to go when the request runs into difficulties. Examples include situations where the manager is perceived as unsupportive of the accommodation request or clearly does not know how to act on it. In such cases, it is not always clear to the requestor where they can go for additional support or advice. While there are supports available from managers through collaboration with the Labour Relations team, the Union (for unionized members), the Ombudsperson, and informal and formal organizational citizenship groups, employees and leaders may have varying knowledge or comfort in accessing these supports. The Roadmap noted that leaders may not always be aware of the supports available to them, especially as they relate to sensitive or difficult discussions.

There is no single solution to creating a fully accessible organization. Instead, employees, with support from their managers, should be empowered to manage their disability in a way that works best for them. To avoid the emergence of secondary barriers, such as resentment from colleagues for what they may see as favourable treatment, the CER should work to create a more understanding and empathetic work culture. The CER will strive toward offering accessibility-focussed sensitivity training for all staff to help create a more positive and inclusive culture.

In fall of 2022, a workshop was held to introduce a human-centred approach for staff and managers to help understand the workplace experiences of people with disabilities. The workshop provided insight into what a successful accommodations process should look like and identified what should and should not be assumed about its implementation.

The Roadmap recognized that employment equity, diversity and inclusion is impacted by many aspects of internal culture and operations. The Roadmap identifies priorities to help guide the organization toward making improvements when responding to allegations of misconduct, opportunities for career advancement, and recruitment initiatives. Addressing these will help set the foundations for a more equitable and inclusive organization for persons with disabilities.

Priority Area Two: The Built Environment

The CER operates facilities in Calgary, Montreal, Yellowknife, and Vancouver. Public Services and Procurement Canada leases these facilities on behalf of the CER. Issues with the building facilities must be reported to the National Service Call Centre.

In recent years, the CER has undertaken several initiatives to address accessibility issues in its built environments. These included the 2021 installation of optical access buttons for all washrooms and reception doors and a gender neutral, fully accessible washroom and change room. Concerns with how these systems are operating can be communicated to the National Service Center.

In March 2020, most CER staff were required to work remotely in response to the COVID-19 pandemic. After the pandemic-related public health restrictions started to ease in 2022, the CER undertook a Hybrid Workplace Pilot to enable staff to voluntarily return to working at CER offices while work to determine a longer-term approach to a post-pandemic work environment was underway. A feedback system was put in place for staff to comment or express concerns with the new office arrangements, including any accessibility concerns. There were several staff who highlighted that remote work, and increased flexibility, helped to support accommodations and accessibility-related issues – and it also helped to “level the playing field” for individuals who may have required those supports in the past, but were not available or supported organization-wide until remote work for all was necessary. While the Hybrid Workplace Pilot is still underway, the CER remains committed to supporting accommodations and accessibility-related matters, including undertaking an accessibility assessment of its built (office) environments.

As stated in its [Employment Equity Plan](#), the CER plans to review its facilities, office equipment, and digital tools to identify improvements with respect to accessibility with an initial focus on identifying priorities in respect of such reviews. Additionally, and based on input of its Persons with Disabilities committee, the CER will prioritize and conduct a physical accessibility assessment in 2023-24, in respect of one of its offices or office areas, to gain experience and learning associated with this activity, and opportunities that can be gained by expert advice in this regard. Experience and learning from this opportunity will be used to guide the potential and planning for additional assessments of this nature.

The CER will also make information available on its intranet, as well as in leadership training, on accommodations considerations and processes in a diverse remote/hybrid workplace.

Consultations indicated that persons with disabilities may be hesitant to apply for positions if they don't know whether CER facilities are accessible. The CER recognizes that increased and better-informed communication of the accessibility measures of its built environments in its internet and possibly job posters can allay concerns among potential job candidates and serve as a best practice from a recruitment and retention perspective.

Priority Area Three: Information and Communication Technologies (ICT)

A key pillar of the Government of Canada's Accessibility Strategy is to make ICT usable by all. However, more work remains to be done with comprehensive accessibility assessments of its external ICT and other services.

The Government of Canada is updating its [ICT Accessibility Scorecard and maturity model](#) that can help organizations better define their strengths, identify shortcomings, and establish what can be done to move forward and improve accessible ICT. This is a tool that the CER plans to use to assess the accessibility of its ICT services, and to provide practical solutions to addressing any barriers.

To ensure accessibility is considered from the start, new ICT applications are required to pass accessibility design checklists. In fall of 2022, the Government of Canada developed a new [Standard on Information and Communication Technology Accessibility](#). This new standard would expand the scope of accessibility requirements to include all ICT that is procured, developed, and used by the Government of Canada, and will be part of removing barriers to accessibility in Information and Communications Technologies. The CER will take action to bring the CER into compliance with this new standard. As well, user feedback is essential to maintaining accessibility of ICT solutions, and the CER will include accessibility questions in its feedback mechanisms for ICT products.

Barriers to accessibility in information and communication technologies at the CER tend to relate to a lack of knowledge of existing accessibility supports. For example, the CER uses the Microsoft Office 365 suite in its day-to-day business, which includes many built-in accessibility features. However, many CER staff are simply not aware of these features. Making these features better known across the organization is a way to leverage these existing supports to improve accessibility.

The CER, like many organizations, has been strengthening its communications products with data visualizations. This can enrich the user experience for many people. However, those people who rely on machine reading technology to process information are not always able to access data visualizations. The CER understands this and will continue to monitor options for advancements in accessibility as they are introduced and made available for data visualization tools in use at the CER.

Many disabilities can be satisfactorily accommodated through technological solutions. However, external and internal users who access CER programs and services are often not aware of what technologies exist that can help them. Some staff indicated that when a potential information and communication solution is identified, the procurement process can sometimes be quite lengthy.

The CER will continue to work on developing processes to expedite the procurement of ICT solutions to accommodations and continue to highlight accessibility-related supports as part of its internal and external programs and services offerings.

The CER recently signed a Service Level Agreement with Service Canada's [Accessibility, Accommodation and Adaptive Computer Technology](#) (AAACT) program. The program provides

a variety of supports to the accommodations processes within the Government of Canada. However, not all CER managers or staff are aware of the program or of the services that it offers. This means that some barriers in the CER accommodations processes may persist needlessly. The CER will familiarize employees involved in the accommodations processes with AACT's accommodations supports.

Priority Area Four: Communication, other than ICT

There are three broad components to communications and their relationship to barriers to accessibility. They range from addressing prejudices and stigmatization encountered by persons with disabilities, training and awareness of accessibility issues and supports, to changing communication at the CER so that it is inclusive of everyone.

The CER's [Employment Equity Plan](#) identifies the need to consider and review course offerings that raise accessibility awareness and understanding for all staff.

Some persons with neurological or cognitive disabilities can be disadvantaged by overly complex language. Encouraging the use of plain language is already a policy objective within the Government of Canada and at the CER. Policies, procedures, and/or tools can be enhanced to support doing so, for both internal and external communications activities.

For example, the CER's Commission receives and manages enormous amounts of complex information during adjudication and regulatory decision-making processes. Subsequently, its Reasons for Decisions can also reflect the complexity and volume of the information that went into it. These decisions can be difficult to access for Canadians with certain neurological or cognitive disabilities. To help with this, the CER prepares a support document – called the Decision in Brief – to accompany the Reasons for Decision where there are particularly complex or issues with significant public interest and attention. This practice can help make regulatory decisions more accessible to persons with certain disabilities.

Priority Area Five: The Procurement of Goods, Services, and Facilities

The CER requires that accessibility considerations be included from the start in all ICT procurement processes. This supports the Government of Canada's [Guideline on Service and Digital](#), which requires that accessibility be included at the design stage when procuring new ICT solutions and equipment.

However, employees who initiate the procurement process at the CER may not always know how to properly consider accessibility in the procurement process. Better training on accessible procurement for all employees who may initiate a procurement action can help with this, and the CER will look at offering such training, initially for procurement staff. Procurement staff, in particular, should know and understand what accessible procurement means and be able to advise other staff on accessibility considerations in their contract design. Over time, the CER will update its procurement processes so that accessibility considerations are built in throughout.

As noted earlier, many disabilities can be satisfactorily accommodated through technological solutions. However, a barrier to acquiring these solutions is the amount of time that the procurement process for ICT solutions can take. There are also concerns related to ensuring requests are handled with appropriate privacy considerations in mind, all-staff training would assist with addressing this concern.

Future updates to the CER's procurement processes will look to streamline procurement procedures for accommodations, including ensuring all staff involved in these processes understand the accommodations processes and related privacy considerations.

Sometimes a person with a disability may not know whether a piece of equipment or technology will work for their condition. One of the services offered by AACT is to help identify solutions for persons looking for accommodation equipment. Other services include the potential to borrow equipment to determine whether it meets the needs of the accommodation. In such cases, the CER's procurement processes should indicate whether this option is available. The new service agreement with AACT, and a greater familiarity with the program, will help the organization to be able to make better use of its services.

Priority Area Six: The Design and Delivery of Programs and Services

The CER understands that accessibility must be considered in its programs and services right from the design stage. To date, the CER has ensured that any new programs or services incorporate a GBA Plus lens, which includes accessibility considerations.

The CER has already taken several initiatives to address issues faced by persons with disabilities. As noted, the CER began a three-year comprehensive review of its Human Resource-related policies in early 2022. These policies are being assessed from a GBA Plus lens, as well as equity, diversity, inclusion, and accessibility perspectives.

The CER can build on these learnings by incorporating accessibility considerations into the design of future programs and services.

Addressing accessibility issues is hampered by an incomplete dataset of persons with disabilities at the CER. The CER's [Employment Equity Plan](#) includes commitments to improve these datasets. For example, in early 2023, the CER plans to launch an initiative to encourage staff to self-identify, which will provide up-to-date information to enable the CER to better address accessibility issues faced by persons with disabilities.

Priority Area Seven: Transportation

The CER relies on transportation in several ways. While headquartered in Calgary, it has regional offices in other parts of Canada, and some employees need to travel between these offices and to other places. As a national regulator, CER employees may need to be present anywhere in Canada at any given time to visit sites that are away from reliable transportation infrastructure, such as on field inspections.

Commercial airlines and vehicle rental establishments usually have accommodations for persons with disabilities. Sometimes commercial transportation service providers may not always be able to provide an accommodation, such as for underserved locations or destinations. Accessibility issues with respect to the transportation requirements of the CER's work are, and should be, considered as part of all staff journey management activities and processes.

The CER is committed to continually improving its travel policies and processes in the coming years to ensure that any barriers to accessibility are identified and solutions to them are made available.

Summary

From early in the consultations, persons with disabilities noted that the most significant barriers they encounter at the CER are attitudinal. They recounted having experienced negative attitudes from other employees, including managers, and that these attitudes worsened their ability to manage their disability.

Persons with disabilities may need to work differently than their colleagues. As part of the internal consultations on this plan, some staff identified that these different work habits may cause misunderstandings or resentments from unsympathetic work colleagues and managers. This could create stigmas, where colleagues and/or managers may label the employee with the disability as lazy, or uncommitted or unsuitable to their job. These negative attitudes could also become aggressions and add to the difficulties with which persons with a disability are already struggling.

Many managers at the CER are sensitive to the issues faced by persons with disabilities and want to provide proper supports to them. One barrier that was identified by staff was that managers may not always have the supports they need to provide that support, or more accurately, they don't know where to go to get them. Some managers might be less empathetic, and some are reported to have expressed attitudes that persons with disabilities require too much effort to manage and accommodate, and that they would be reluctant to supervise them.

There is no easy solution to these barriers. Education, sensitization, training, and awareness can begin to address them. Inclusive behaviour should be encouraged, and the review of its training on employment equity, diversity and inclusion can begin to address some of the competency shortfalls in course and learning opportunities that the CER currently offers.

Having the right supports for accessibility is also important. For example, people may want to do the right thing in support of accessibility, but do not know how. Better guidance and resources for employees to know how to contribute to making the organization more open to persons with disabilities can help the organizations be able to address this.

The CER is supportive of employee engagement through various committees that share the goals of making the CER more inclusive for all employees, such as the Persons with Disabilities committee. As noted in the development of the Roadmap, these committees do a lot of work to promote inclusiveness and belonging. However, with a few exceptions, these organizational citizenship committees are voluntary, without formal managerial support or stewardship. Their activities can sometimes take place in addition to employees' regular duties, which can deter participation and deprive the organization of the input these committees can provide.

The CER must also address the situations where staff or managers are not receptive to persons with disabilities. As noted in the Roadmap, employees are often hesitant to speak up – either to request an accommodation or to report negative encounters – out of fear of worsening the situation or falling victim to a reprisal. Staff have also reported in PSES that incidents of harassment or hostility are not handled to satisfaction. To begin to address these complex issues, and to build on the priority recommendations from the Roadmap, the CER is committed to reviewing its misconduct related policies, with greater consideration for any policy gaps with respect to persons with disabilities and will also consider how policies and processes inter-relate.

As an overall approach, the CER can look further into its management and committee governance structures and determine the best way to position an executive champion, or other support structures, to improve how accessibility is considered in CER management and committee governance. This includes the integration of formalized leadership performance management accountabilities as noted in the [Employment Equity Plan](#).

The CER Accessibility Plan builds on work the CER has undertaken in recent years to make the organization more inclusive. And while much work has been done, much work remains ahead.

This Accessibility Plan aims to identify necessary steps towards organizational changes to create a barrier-free CER. This is a long-term effort, and meaningful change can only come from individual and systemic changes, both of which take time, resources, and a willingness to engage.

The CER will monitor the progress of the actions outlined in this Plan and will submit its Progress Report for publication at the end of 2023. The CER also welcomes feedback on this Plan, which will contribute to the development of the Progress Report, and ultimately help guide the path towards a barrier-free CER by 2040.