Office of the
Conflict of Interest and
Ethics Commissioner

Commissariat aux
conflits d'intérêts et
à l'éthique

Accessibility
Progress Report

2024

December 2024

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1. General

1.1 Overview

The Office of the Conflict of Interest and Ethics Commissioner recognizes the importance of accessibility and to provide a barrier-free environment in the work place. The Office published its accessibility plan on December 15, 2022, and its first Progress Report was published at the beginning of December 2023. Those documents and other resources are available on our website, they are available upon request in alternative formats.

1.1.1. Contact Information and Feedback Process

The Office welcomes feedback, including feedback submitted anonymously, about accessibility at the Office and about this progress report. We are committed to reviewing the feedback we receive in good faith and to taking steps to address, remove and prevent barriers to accessibility that are identified through this feedback.

Feedback about either accessibility at the Office or this progress report may be submitted in the following ways:

- By contacting the Office's Manager, Human Resources Client Services, Corporate Management, using the information below:

  Manager, Human Resources Client Services
  Office of the Conflict of Interest and Ethics Commissioner
  Parliament of Canada
  Ottawa, Ontario K1A 0A6
  AccessibleCIE@cie.parl.gc.ca
  613-995-0721

- By completing the online accessibility feedback survey. Alternate formats of the survey can be requested by emailing us or calling us at 613-995-0721.

The Office must keep the most recent version of the description of its feedback process for seven years after it is published or until a new description is published.

The Office will acknowledge the feedback it received in the same way that it was sent to it, unless it was sent by an anonymous source. The Office will review all feedback received and take steps to address barriers to accessibility that are identified. A copy of any feedback received must be kept for seven years.

Alternative formats of this progress report and/or a description of the feedback process can be requested by emailing us or calling us at 613-995-0721.

In accordance with the [Accessible Canada Regulations](#), the Office will provide the following alternative formats within 15 days of the initial request:

- Print
- Large print (increased font size)

In accordance with the regulations, the Office will provide the following alternative formats within 45 days of the initial request:

- Braille (a system of raised dots that people who are blind or who have low vision can read with their fingers)
- Audio (a recording of someone reading the text aloud)

1.2   Definitions

The following definitions are set out in the *Accessible Canada Act* and apply throughout this progress report:

Barrier: Anything that might hinder the full and equal participation in society by people with disabilities. Barriers can be physical, architectural, technological, attitudinal, based on information or communications, or the result of a policy or procedure.

Disability: Any impairment or difference in physical, mental, intellectual, cognitive, learning, sensory, or communication abilities that, when interacting with a barrier, hinders a person's full and equal participation in society. Disabilities can be permanent, temporary, or change over time, and they may or may not be evident.

1.3   About the Commissioner and the Office

The Conflict of Interest and Ethics Commissioner administers the *Conflict of Interest Act*, a law that applies to public office holders and the *Conflict of Interest Code for Members of the House of Commons*, a code of conduct that forms part of the rules of the House of Commons. These two regimes seek to prevent conflicts between private interests and the public duties of appointed and elected officials. The Commissioner also provides confidential advice to the Prime Minister about conflict of interest and ethics issues.

The position of Conflict of Interest and Ethics Commissioner was created following the adoption of the *Federal Accountability Act* in 2006. The Commissioner is an Officer of the House of Commons whose mandate is set out in the *Parliament of Canada Act*.

The Commissioner is completely independent of the government of the day and the Office is part of the parliamentary infrastructure.

The Commissioner is supported by an Office of approximately 50 employees who occupy positions related to compliance, investigations, legal services, communications, and corporate management.

1.4   Compliance with future standards

Accessibility Standards Canada is responsible for the development of accessibility standards for removing barriers to access faced by people with disabilities. These standards fall within the priority areas listed in the *Accessible Canada Act*.

This organization developed a document called *Roadmap to 2040 – A plan to guide the work of Accessibility Standards Canada* as a guide for its work.

At the time of the preparation of this progress report, the Office is aware that standards are in development: some have completed a first public review, while others are pending.

As standards are completed by Accessibility Standards Canada and made publicly available on their website, the Office will review them as they are released and will adjust its actions to ensure that these standards are implemented.

1.5   Accessibility goals and the Accessibility Working Group

The aim of the Office is to complete the accessibility goals for each priority area described in Part 2 of the Accessibility Plan by the end of the year 2025.

To achieve the accessibility goals and to implement the plan, the Office created an accessibility working group chaired by the Manager, Human Resources Client Services, Corporate Management, and comprised of employees from the various divisions of the Office.

The working group:

- monitors the implementation of the accessibility goals outlined in the plan;

- works with the Office's Manager, Human Resources Client Services, Corporate Management, to receive, acknowledge, and review feedback on accessibility;

- writes the progress reports; and

- consults persons with disabilities.

2. Areas described under section 5 of the *Accessible Canada Act* (ACA)

2.1 Employment

2.1.1. Overview

This priority area is about the importance of ensuring access to employment opportunities and an accessible workplace.

The Office is a separate employer whose employees are not part of the federal public administration.

The Office has its own terms and conditions of employment, relating to hours of work, employee benefits and general working conditions affecting employees. Employees are not covered under any collective agreement. The Office has a Joint Labour Relations Committee, consisting of management and employee representatives to ensure that any new or revised policy, directive, and guideline related to human resources management is developed in consultation with all employees of the Office.

The Office is committed to employment equity and having a diverse and inclusive workforce. The Office's staffing processes and appointments are based on merit and are free from political influence.

All employees of the Office are expected to follow the values set out in its Code of Values and Standards of Conduct which reflect its commitment to diversity and inclusion.

The Office has employment-related policies, in areas such as telework, occupational health and safety, procedures for emergency response, employee recognition, employee discipline, disability management and duty to accommodate, Interchange Canada assignments, job shadowing, performance management, staffing procedures, training, termination and demotion, as well as on equity diversity and inclusion.

The Office reviews and updates its policies and guidelines in line with those of other parliamentary entities and the wider public service.

2.1.2. Progress on Accessibility Goals

The Office adopted a systematic review of its employment practices, procedures, and policies for accessibility in the past years.

The Office asked for feedback for this area on the employee survey of the Office's progress and results can be found in section 4 (Feedback). The Office is on track to complete its accessibility goals related to this area by the end of 2025.

2.1.3. Accessibility Goals

1. Review staffing tools, approaches, and policies to ensure that any barriers are identified and removed so as to make employment with the Office accessible and inclusive.

   Status: in progress

   Progress

   Human resources policies, regulations, guidelines and other documents or processes, are continuing to be revised to identify and, as necessary, remove any accessibility barriers.

   Staffing processes are dedicated to addressing accessibility needs, with candidates able to request accommodations from Human Resources as noted in job postings.

   Terms and conditions of employment were revised, approved, and published on the Office's intranet by meeting the accessibility requirements.

2. Review the Guideline on Disability Management and Duty to Accommodate.

   Status: completed

   Progress

   The Office has completed its review of the Guideline, and it was determined that the document still reflects best practices. The Office is aware that other parliamentary entities are revising their guidelines and once that exercise is completed, we will take that opportunity to review our own Guideline to incorporate any new best practices.

3. Continuously support the employee network groups, including the promotion of disability groups on the parliamentary Hill.

   Status: evergreen

   Progress

   The Office continues to regularly participate in meetings on accessibility with representatives of the Parliamentary Precinct Universal Accessibility Working Group. The information shared at this working group is communicated with employees in various ways such as office-wide meetings and the intranet. Collaboration efforts with this group will continue in 2025.

4. Provide access to training sessions for employees at all levels, as per the Guidelines on Learning, Training and Development, on accessibility, barriers, unconscious bias and accommodation requests and processes so they can build expertise.

Status: evergreen

Progress

The Office provides employees with access to the Canada School of Public Service training database and regularly communicates to employees new accessible training opportunities from various organizations, including Eliminating Barriers: Lessons Learned in Accessibility, and Addressing Disability Inclusion and Barriers to Accessibility. Those trainings opportunities are available on the intranet and will be updated as new content becomes available. Efforts and collaboration will continue in the future.

2.2 The Built Environment

2.2.1. Overview

The Office has adopted a hybrid work environment, where employees may, if they wish and subject to operational requirements and duties, work from the Office's primary location (the 22nd floor of 66 Slater Street in downtown Ottawa) or an approved alternate work location.

This priority area concerns the Office's physical environment at the primary location, which is a significant factor on whether people with disabilities can move freely, access and function within the space in as similar a manner as possible as those who do not have disabilities.

At its primary location of work, the Office's lobby on the 22nd floor is accessed by using the building's elevators. The use of a security card is required to access the workspace from the lobby.

There are washrooms, including an accessible washroom, on the 22nd floor. There are automatic doors located in some of the common areas such as washrooms and main entrance.

The Office has Procedures for Emergency Response and an active Health and Safety Committee.

2.2.2.   Progress on Accessibility Goals

The Office is in the process of moving to the 23rd floor at its primary location. The floor plan was developed and approved with accessibility considerations at the forefront of the project. The Office is expected to complete its accessibility goals related to this area by the end of 2025.

The Office asked for feedback for this area on the employee survey of the Office's progress and results can be found in section 4 (Feedback).

2.2.3.   Accessibility Goals

1. Ensure the Office's change to its physical office space will align with current accessibility requirements, working with Public Services and Procurement Canada to correct and eliminate accessibility barriers where noted.

   Status: in progress

   Progress

   In the planning for the move to the 23rd floor, Public Services and Procurement Canada has engaged the services of accessibility experts, to ensure the office's physical environment at its primary location meets all accessibility codes and regulations. The construction of the 23rd floor is on track to meet all applicable accessibility codes and regulations.

2. Ensure that its office space will include signage standards meeting accessibility requirements and best practices, and develop plans to ensure a periodic review of its signs to correct and eliminate barriers.

   Status: in progress

   Progress

   The Office is looking towards digital signage, where possible, for the 23rd floor. Using digital signage allows the office to be adaptable to individuals with varying visual impairments. In the instances where digital signage is not possible, accessibility experts have been engaged to ensure we meet legislation, codes, and regulations surrounding accessibility.

3. Review and revisit accessibility as it relates to its built environment, including by making use of the accessibility feedback process, to ensure that new barriers have not been created and that existing accessibility features have been maintained.

   Status: evergreen

   Progress

   In finalizing the plans for its move to the 23rd floor, the Office remained mindful of its goal to keep up to date with accessibility standards, while ensuring that the physical environment does not create any new barriers for individuals currently employed by the Office. Looking ahead, the Office will continue to encourage new and existing employees to use any and all feedback channels at their disposal, to provide feedback on accessibility.

4. Review its emergency procedures to incorporate information about emergency procedures for people with disabilities. The Office will also look at providing relevant training in this area to ensure that employees are aware of the emergency plans and who is responsible for assisting employees or visitors both inside our buildings and in the immediate surrounding area in case of an emergency.

   Status: evergreen

   Progress

   The Office's Health and Safety Committee revised its emergency procedures with accessibility needs in mind. These procedures were strategically posted on Office premises, as well as on the Office's intranet. Training remains available for employees who have volunteered to be fire wardens during an evacuation.

2.3   Information and Communication Technologies (ICT)

2.3.1.   Overview

This priority area is about offering accessible digital content and technologies.

Information and communication technologies are used to deliver and access information, perform activities, and provide services. They can include, but are not limited to, hardware, software, and video or voice communication tools.

In support of public education about the regimes that it administers, the Office makes a range of digital information available on its website (HTML and PDF) and is active on social media.

The Office also has a non-public-facing site used by its employees, an intranet site based using Microsoft SharePoint.

The Office is presently developing a new declaration portal, public registry and client relationship management application. The new declaration portal is intended to give regulatees (appointed and elected persons who must comply with the regimes administered by the Office) an alternative and secure means to submit information to the Office. The new public registry is intended to enhance the information the Office must make public about certain private interests, gifts or travel of regulatees. The new client relationship management application is intended to provide employees the ability to capture and report on more data.

The Office, including its employees, also use email, Voice over Internet Protocol (VOIP), and other applications, such as, but not limited to, MS Teams, SharePoint and Loop, to communicate and share information.

The Office has contractual agreements and works predominantly with the House of Commons in relation to the provision of information and communication technology.

2.3.2.   Progress on Accessibility Goals

The Office is in the process of applying Web Content Accessibility Guidelines (WCAG 2.2), where and when applicable to its information and communication technologies.

The Office asked for feedback for this area on the employee survey of the Office's progress and results can be found in section 4 (Feedback).

2.3.3.   Accessibility Goals

1. Ensure that all of the Office's online platforms are accessible to all users.

    Status: evergreen

    Progress

    For tools and applications which are developed with our parliamentary partners, we have agreements and teams in place to ensure they are built, developed, and tested against WCAG 2.2 standards, or whichever standards may be in place from time to time, and corrected where possible to meet those standards.

    For tools and applications which are not developed with our parliamentary partners (for example, Microsoft 365 suite of applications), we are continually endeavouring to remain abreast of accessibility functionality being implemented within them, to ensure any employee who is in need of a functionality to address their specific accessibility requirements may be accommodated by these standard tools. And, in instances where this is not possible, the Office looks to other technologies to meet individual accessibility requirements, as and where needed.

2. Identify and address accessibility gaps with the Office's website and update it to comply with the new WCAG2.2 criteria.

Status: in progress

Progress

The Office is in the process of redeveloping its website with parliamentary partners. Once the development is far enough along, it will be, to the greatest extent possible, tested against WCAG 2.2 standards or whichever standards may be in place from time to time.

3. Adapt the formatting of newly created or updated documents and forms to accessibility guidelines.

Status: evergreen

Progress

The employee responsible for desktop publishing has been applying the skills learned in training on how to make the Office's documents more accessible. The employee is ensuring that new and revised internal and external documents and forms are formatted to be accessible. Reminder checklists have been created and are followed to ensure that accessibility principles are applied.

4. Plan for a review of all software applications developed in-house or acquired from third parties in order to identify and remove any potential accessibility barriers and to determine how they interact with adaptive technology.

Status: evergreen

Progress

A review of all applications and tools was completed.

For tools and applications which are developed with our parliamentary partners, we have agreements and teams in place to ensure that as they are built and developed, they are tested against WCAG 2.2 standards. And any barriers identified during these tests are corrected if possible. Any barriers not captured by these tests will be endeavoured to be overcome by the Office as they arise.

For tools and applications which are not developed with our parliamentary partners (for example, Microsoft 365 suite of applications), the Office is continually endeavouring to remain abreast of accessibility functionality being implemented within them, to ensure any person who is in need of a functionality to address their specific accessibility requirements may be accommodated by these standard tools. And, in instances where this is not possible, the Office will endeavour to look for solutions to overcome any barrier as they arise.

2.4 Communication, Other Than ICT

2.4.1. Overview

This priority area is about creating barrier-free spaces where everyone can communicate, share, and access information. Accessible communication can involve clear, direct, and plain language. Information can also be offered in different formats to enhance accessibility.

The Office communicates with regulatees, the media and members of the public whether by phone, email, post, fax, through publication of reports, guidelines, and information notices, as well as in person, through presentations or through direct messages on social media.

The Office has developed procedures and processes to ensure that it provides accurate, timely and useful information to the individuals and groups seeking information.

2.4.2. Progress on Accessibility Goals

The Office will continue to implement the accessibility guidelines around its communications, with a strong focus on plain language.

2.4.3. Accessibility Goals

1. Develop and implement plain language guidelines for the Office's publications and communications.

    Status: evergreen

    Progress

    The Office's Internal Communications Working Group continued its plain language audit to review the Office's communication products and ensure they follow plain language principles. The initial scope of the plain language audit has been achieved, but some information notices will be updated to use plain language. The Office's Style Guide was updated in both official languages to include plain language guidelines, helping employees communicate in a way that allows people to access, understand, and use the information the Office shares. These guidelines are now consistently applied when creating new communications, and internal policies and procedures are being rewritten into plain language as they are updated. Employee awareness of the importance of plain language is growing.

2. Implement accessibility guidelines for its communications (including presentations, publications and images).

Status: evergreen

Progress

The Office continues to adopt the Government of Canada's Guidelines on Making Communications Products and Activities Accessible as well as the Directive on the Management of Communications in the designing and development of its communications products. This includes using plain language, applying clear and consistent layouts, designing and formatting PDF and Word documents, as well as PowerPoint presentations, to be accessible, writing alternative text for informative and decorative visuals, among other considerations. The employee responsible for desktop publishing ensures that new and revised internal and external documents and forms are formatted to be accessible, based on Government of Canada guidelines and knowledge acquired through specialized accessibility training. Reminder checklists have been created and are followed to ensure that accessibility principles are applied.

2.5   Procurement of Goods, Services, and Facilities

2.5.1.   Overview

This priority area is about making accessibility an important component of the procurement process and about ensuring that the Office purchases accessible goods, services, and facilities.

Procurement refers to the acquisition of goods and services by any means, including purchase, rental, lease, or conditional sale.

For the Office, procurement is done in accordance with the Office's Directive on the Procurement of Goods and Services, Policy on the Delegation of Financial Signing Authorities, and the Directive on Acquisition Cards.

The current procurement directive mentions an objective of enhancing access and includes a requirement for following ethical practices.

As set out in its financial reports, the Office enters into transactions with other government and parliamentary entities in the normal course of business and on normal trade terms. For example, the Office has agreements with the House of Commons related to the provision of information technology and security services, and the Public Services and Procurement Canada related to the provision of compensation services.

2.5.2.   Progress on Accessibility Goals

The Office has reviewed its procedures related to procurement of goods, services offered, and facilities being used with accessibility goals in mind.

The Office asked for some feedback on its accessibility goals related to procurement of goods, services, and facilities and is on track to complete these accessibility goals by the end of 2025.

2.5.3.   Accessibility Goals

1.   Review the current procurement directive and related policies to incorporate accessibility considerations.

     Status: in progress

     Progress

     The review of the procurement policy has been completed and is being revised for approval.

2.   Review the inventory of current goods and services and enquire about the accessibility practices and services of current suppliers.

     Status: completed

     Progress

     The Office has reached out to a number of suppliers to enquire about their accessibility practices and services. It was communicated by suppliers that accessible services are available as necessary.

2.6   Design and Delivery of Programs and Services

2.6.1.   Overview

This priority area is about ensuring that everyone can receive and access the services and programs delivered by the Office. The key programs and services delivered by the Office involve:

- reporting to the Prime Minister and to Parliament;
- helping regulatees achieve and maintain compliance with the conflict of interest regimes;
- giving regulatees confidential guidance tailored to their individual situations;
- helping regulatees understand their obligations under the regimes through education and outreach;
- applying investigations and other enforcement provisions as appropriate;
- exchanging information with domestic and international counterparts;
- providing programs and services to employees.

2.6.2. Progress on Accessibility Goals

The Office received no feedback about barriers related to design and delivery of programs and services and is on track to complete the following accessibility goal by the end of 2025.

2.6.3. Accessibility Goal

1. Provide employees with appropriate tools and training to make accessibility a key consideration in all future programs and services.

   Status: evergreen

   Progress

   The Office provided accessibility training opportunities to employees and continues to look for more ways to incorporate the lessons learned in its delivery of programs and services. For example, the Office has developed a course for regulatees through Articulate 360, an e-training platform with accessibility features that support Web Content Accessibility Guidelines. Its content also works with screen readers.

2.7 Transportation

2.7.1. Overview

This priority area aims to create a barrier-free federal transportation network.

While the Office still does not provide transportation services, travel on behalf of the Office may from time-to-time form part of an employee's official duties. In this context, the Office has Guidelines on Travel that consider accessibility, as well as a Directive on Travel and Conference Expenditures, Guidelines for the Approval of Travel for the Conflict of Interest and Ethics Commissioner, the National Joint Council Travel Directive, the Code of Values and Standards of Conduct for employees of the Office and other internal policies or directives related to financial management.

The primary place of work for the Office, 66 Slater Street, is located in downtown Ottawa. It is accessible by public transit and the building has underground public parking operated and managed by a third party and includes access to the building's elevators. Parking is also available at the National Arts Centre across the street from the building, which is also accessible.

The Office has guidelines on parking and the use of parking passes by employees.

As a result of its location, onloading and offloading from vehicles as well as passenger drop-off or pick-up can be challenging outside of the building.

2.7.2.   Progress on Accessibility Goals

The Office has conducted a review and identified that more work is needed to incorporate accessibility considerations in its directives and guidelines relating to transportation.

The Office received no feedback on its accessibility goals related to transportation and is on track to complete its accessibility goals by 2025.

1.   Review policies and guidelines related to employee travel to identify and remove any accessibility barriers to ensure that all employees travel safely regardless of disability.

     Status: in progress

     Progress

     While the Office completed an initial review of its guidelines relating to transportation, namely the Guidelines on Travel; Directive on Travel and Conference Expenditures; Guidelines for the Approval of Travel for the Conflict of Interest and Ethics Commissioner, a further review will be needed to address accessibility considerations.

2.   Update guidelines on parking and the use of parking passes by employees to include accessibility standards, including as to how parking spaces are attributed.

     Status: evergreen

     Progress

     The Office completed an initial review of its parking guidelines. There are broad enough provisions within them to address individual accessibility requirements as they are presented by employees engaged by the Office from time-to-time. The Office, however, remains committed to periodically reviewing these guidelines to ensure the provisions continue to remain broad enough to address any future individual accessibility requirement.

3. Consultations

Over the past year, the Office regularly participated in meetings on accessibility with representatives of other parliamentary precinct entities.

The purpose of these meetings was to share experiences, particularly in the drafting of the progress reports, share feedback on consultations with persons with disabilities who have had dealings with parliamentary entities and advocacy groups, and to share information to help align an approach to accessibility by parliamentary entities.

The information shared at this working group was greatly appreciated and was instrumental in the preparation of this progress report.

4. Feedback received

Through this year's employee survey of the Office's progress in accessibility, the Office consulted with employees, including those who self-identified as living with disabilities, to have a better understanding of the barriers they've observed or are currently facing. Employees were asked about the following:

- Built Environment

- Employment (job opportunities and employment policies and practices)

- Information and Communication Technologies (ICT)

- Communication, Other Than ICT

- Procurement of Goods, Services, and Facilities

- Design and Delivery of Programs and Services

- Transportation

Overall employees mentioned that they are still interested in obtaining more training on accessibility, specifically on accessibility awareness, how to create accessible documents, how-to management training for when a disability is disclosed, and hosting accessible events and meetings.

The survey included an accessibility quiz. Employees were asked to identify whether various photos depicting people engaging in activities were demonstrative of persons with a disability. The quiz results also show that training on accessibility awareness and needs could be beneficial.

The feedback we received confirms the importance of several initiatives already captured in the accessibility plan and the barriers that were identified will help pinpoint areas where further consultation would be beneficial.

The Office made the following educational sessions available to its employees in the past year:

- Workshop on multiple chemical sensitivity

- Conference with Stephanie Cadieux, Canada's Chief Accessibility Officer

- Lived Experience Session: Living with ADHD

- Accessibility Presentation – Food for Thought Series

In the future, the Office will continue to make similar sessions available to employees. It will also look to make available educational sessions on the topics identified in the survey.