GREAT LAKES PILOTAGE AUTHORITY

Accessible Canada Act

Multi-Year Accessibility Plan

June 1, 2023 to December 31, 2025

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GREAT LAKES PILOTAGE AUTHORITY

ACCESSIBILITY PLAN

Accessible Canada Act

Background

In July 2016, the government of Canada began their consultations with more than 6,000 Canadians to determine what an accessible Canada means to them. As a result of these consultations, *Bill C-81: An Act to Ensure a Barrier-Free Canada*, was tabled in June 2018. The *Accessible Canada Act*, which aims to make Canada a barrier-free country by January 1, 2040, came into force in July 2019. To attain that goal, we must proactively identify, remove, and prevent barriers in the following seven (7) 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 (airlines, as well as rail, road and marine transportation providers that cross provincial or international borders)

Guiding principles

- "Nothing without us": persons with disabilities are involved in the design and implementation of the strategy
- Collaboration: departments and agencies work in collaboration with each other, with bargaining agents, and with other public, private, and not-for-profit organizations
- Sustainability: the strategy prioritizes actions that will have an enduring impact
- Transparency: the strategy is developed and implemented transparently, and departments and agencies will report openly and transparently on their efforts to remove barriers

Goals

Five goals are key to realizing the vision:

1. Employment – Improve recruitment, retention, and promotion of persons with disabilities
2. Built environment – Enhance accessibility
3. Technology – Make information and communications technology usable by all
4. Services – Equip employees to design and deliver accessible programs and services
5. Culture – Build an accessibility-confident workforce

The Accessible Canada Act has the following planning and reporting requirements for federally regulated organizations:

- **Prepare and publish accessibility plans:**

  - make accessibility plans to identify, remove, and prevent barriers in the priority areas in their:
    - policies
    - programs
    - practices
    - services
  - update their plans every 3 years or as specified in regulations, and
  - consult people with disabilities when creating and updating their plans
- **Set up a feedback process:**

  - have a way to receive and deal with feedback about their accessibility

- **Prepare and publish progress reports:**

  - make regular progress reports that describe the actions the organization has taken to implement their accessibility plans
  - include information in their reports on feedback received and how the organization took the feedback into consideration, and
  - consult people with disabilities when preparing their reports

General

The principal mandate of the Great Lakes Pilotage Authority to establish, operate, maintain and administer a safe and efficient marine pilotage service within designated Canadian waters in the St. Lawrence River and the Great Lakes Region. Great Lakes Pilotage Authority is subject to the Accessible Canada Act, which came into force in July 2019.

Feedback Mechanism

The Accessible Canada Act requires organizations to establish a departmental process for receiving and receiving and addressing feedback regarding the implementation of the accessibility plan. Great Lakes Pilotage Authority will be regularly monitoring and evaluating feedback and ensuring that it is incorporated into its future plans when possible.

If you have any questions, feedback or suggestions, you can communicate with us by mail at:

Great Lakes Pilotage Authority
202 Pitt Street
P.O. Box 95
Cornwall, ON
K6H 5R9

Telephone: 613-933-2991

Email: accessibility-accessibilite@glpa-apgl.com

Alternate formats of this accessibility plan are available upon request. Please contact the Great Lakes Pilotage Authority for information and support.

Executive Summary:

Great Lakes Pilotage Authority's first-ever accessibility plan is a direct reflection of the input, views and suggestions that were provided by employees across the organization. This section summarizes the results from the consultations. We identified the following barriers, which Great Lakes Pilotage Authority used as a basis to develop their plan:

- There is not currently a written accommodation process;
- The level of accessibility of the website is not known;
- The current procurement process does not include consideration for accessibility;
- There has not been any training provided on creating accessible documents;
- There has not been an ergonomic assessment done for office staff in quite some time;
- There are some known accessibility issues with the washrooms

Based on the priority areas identified in the Accessible Canada Act, Great Lakes Pilotage Authority has identified several actions listed below to work towards the elimination and prevention of the specified barriers. These actions will have a direct impact on creating a culture of inclusiveness that calls attention to accessibility at Great Lakes Pilotage Authority. Additionally, Great Lakes Pilotage will be measuring and reporting on progress with respect to the implementation of these actions.

Accessibility Statement

The Great Lakes Pilotage Authority strives to be barrier-free, accessible, and inclusive to all. They are committed to providing accessible and inclusive services for all employees, clients, and other stakeholders. Great Lakes Pilotage Authority will review and develop its programs, policies, goods, and services with the intent to continually improve.

Multi-Year Accessibility Plan

A. Priority areas identified by the Act

1. Employment

Great Lakes Pilotage Authority is dedicated to implementing government-wide initiatives and increasing representation of persons with disabilities across all occupational groups and levels. As such, Great Lakes Pilotage Authority is committed to removing and preventing barriers to recruitment, retention, and the promotion of persons with disabilities. The Human Resources functions follow the structured Government of Canada processes. Internally, employee accessibility accommodations are managed on a case-by-case basis.

Barriers:

1. There is no official written accommodation process
2. Ergonomic assessments are needed for staff in the offices

Actions:

1. Develop a formal written policy for accommodations and make all staff aware of it
2. Arrange an ergonomic assessment to have all office workstations evaluated
3. Provide some awareness training opportunities to increase knowledge and confidence, in order to create a more diverse, inclusive and accessible workplace
4. Provide additional accessibility training to specific employees on specific topics as identified by their role. i.e., training on WCAG (Web Content Accessibility Guidelines) and training to create accessible documents for communications employees, and training on resources available and the overall accommodation process for supervisors and managers

2. Built Environment

Great Lakes Pilotage Authority recognizes the importance of an accessible built environment. As such Great Lakes Pilotage Authority will continue to work with employees, building owners, and the Government of Canada to achieve the highest level of accessibility within the current office.

Barriers:

1. The office spaces do have accessibility features however the washrooms are not fully accessible

Actions:

1. Review the washrooms specifically to see if any accessibility features could be added and plan to make those changes
2. Review office spaces and hallways to confirm level of accessibility, and provide recommendations for improvements that could be made to ensure the spaces are as accessible as possible and to foresee potential barriers

3. Information and Communication Technologies (ICT)

The Great Lakes Pilotage Authority webpage is a sub-page of the Government of Canada website. When needed, the executive assistant reaches out to the third-party who then posts it.

Barriers

1. The level of accessibility of the entire website is unknown but there are inaccessible documents currently posted (i.e. Quarterly Financial Report 2023/03/31)
2. Currently, no one is trained or aware on how to create accessible documents

Actions:

1. Have an official accessibility review of the website done and plan to improve accessibility where necessary
2. Provide training and support on creating accessible WORD documents and accessible PDF's to be added to webpage.
3. Ensure all content posted to the webpage is compliant to WCAG requirements

4. Communications other than ICT

Great Lakes Pilotage Authority is dedicated to ensuring that all its communications, whether that be internal or external, are accessible. This includes ensuring that our communications are written in plain language.

Barriers:

1. There is no existing process to provide alternative formats and communication supports upon request by a user or employee.
2. Technical and/or sector specific language is used in public facing reports and documents.

Actions:

1. Develop a process and information for providing alternative formats and communication supports
2. Create standards for public-facing communications to be in plain language
3. Evaluate current public-facing documents for clarity and plain language, and provide plain language versions where necessary

5. The Procurement of Goods, Services, and Facilities

Procurement is a key partner in achieving accessibility at Great Lakes Pilotage Authority. As such, Great Lakes Pilotage Authority will implement procurement principles, rules, and practices with the goal of advancing accessibility objectives.

Barriers:

1. The current procurement policy does not mention consideration for accessibility

Actions:

1. Develop a policy that specifically states that accessibility will be considered during the procurement process
2. Provide education on accessible procurement for managers and any employees that may work with the procurement processes

6. The Design and Delivery of Programs and Services

Great Lakes Pilotage Authority must consider accessibility in the delivery of our programs and services. A fundamental aspect in achieving this will be implementing meaningful accessibility improvements.

Barriers:

1. There has not been an assessment on current programs and services to evaluate their level of accessibility
2. Accessibility is not thoroughly considered when new programs and services are put in place

Actions:

1. Conduct a thorough review of current programs and services to determine the current level of accessibility
2. Ensure accessibility features are incorporated into all new programs and services prior to implementation
3. All new programs and services created in the future will have consideration for accessibility

7. Transportation

This priority area under the Act is not applicable to Great Lakes Pilotage.

Great Lakes Pilotage Authority - Action Plan at a Glance

Action	Timeline	Roles and Responsibilities
Develop a formal written policy for accommodations and make all staff aware of it	4th quarter, 2023	HR Director
Arrange an ergonomic assessment to have all office workstations evaluated	2nd quarter, 2024	HR Director
Provide some awareness training opportunities to increase knowledge and confidence to create a more diverse, inclusive and accessible workplace	2nd quarter, 2024	HR Director
Provide additional accessibility training for specific employees on specific topics as identified by their role. i.e., training on WCAG (Web Content Accessibility Guidelines) and training on creating accessible documents for communications employees; and training on resources available and the overall accommodation process for supervisors and managers	2nd quarter, 2024	HR Director
Review the washrooms to see if any accessibility features can be added and plan to make those changes	2nd quarter, 2024	HR Director
Review the office spaces and hallways to confirm level of accessibility and recommendations for improvements that could be made to ensure the spaces are as accessible as possible and to get ahead of potential barriers	1st quarter, 2024	HR Director
Have an official accessibility review of the website done and plan to improve accessibility where necessary	3rd quarter, 2024	HR Director
Provide training and support on creating accessible WORD documents and accessible PDF's to be added to the webpage	2nd quarter, 2024	HR Director
Ensure all content posted to the webpage is compliant to WCAG requirements	3rd quarter, 2024	HR Director
Develop a process and information on providing alternative formats and communication supports	2nd quarter, 2024	HR Director
Create standards for public-facing documents for clarity and plain language and provide plain language versions where necessary	3rd quarter, 2024	HR Director

Develop a policy that specifically states that accessibility will be considered during the procurement process	2nd quarter, 2024	HR Director
Provide education on accessible procurement for managers and any employees that may work with the procurement process	2nd quarter, 2024	HR Director
Conduct a thorough review of current programs and services to determine the current level of accessibility	1st quarter, 2024	HR Director
Ensure accessibility features are incorporated into new programs and services prior to implementation	2nd quarter, 2024	HR Director
All new programs and services created in the future will have consideration for accessibility	3rd quarter, 2024	HR Director

B. Consultations

One of the guiding principles of this strategy is the statement "*Nothing without us*" which affirms that persons with disabilities must be involved in the design and implementation of this plan at every stage. Persons with disabilities offer a unique and valuable perspective and our goal is to ensure that we do not have any barriers that prevent their full participation in the workplace and the community we serve.

Methodology

This plan was prepared by first completing an environmental scan to ensure understanding of central agencies' and other government departments' accessibility initiatives and to review existing related policies and procedures. The exercise helped identify existing practices and initiatives that could be adopted as a best practice across the organization. Great Lakes Pilotage Authority consulted with persons with disabilities to hear from them on the current state of accessibility at the Great Lakes Pilotage Authority and with employees who provide services. The consultation was conducted in three parts:

1. Key staff members at Great Lakes Pilotage Authority were consulted in facilitated focus groups. Internal stakeholders with knowledge of employment practices, procurement, facilities, digital resources, communications, and the design and delivery of good and services were consulted in small focus groups. Questions regarding accessibility barriers, current accommodation practices, and priorities for remediation were discussed and responses have been used to inform this plan.

2. Accessible Canada Act Review Committee

The Accessibility Plan was also reviewed by Excellence Canada's standing Accessible Canada Act Review Committee. Consultation Group members are individuals with a variety of lived experience with disabilities, and knowledge of a range of accessibility issues. Consultation was conducted July 18th-July 20th, 2023. The committee consists of members

who self-identify with a disability including mobility, vision, learning disability, mental health disability and hearing loss.

Committee members were provided an overview of the functions at Great Lakes Pilotage Authority and an advance copy of the draft Great Lakes Pilotage Authority Accessibility Plan. Members provided comments on the plan format and readability, accessibility actions as outlined in the plan, suggested timelines for actions, and specific barriers that could be encountered. Committee feedback has been incorporated into this plan.

C. Implementation, Monitoring and Reporting

To ensure that accessibility remains a constant priority within the government, the *Accessible Canada Act* dictates that regulated entities prepare and publish annual progress reports on the implementation of their accessibility plans. Similar to our accessibility plan, progress reports must be prepared in consultation with persons with disabilities. The progress reports must also present the feedback that we received (if any) and how that feedback was taken into consideration. Great Lakes Pilotage Authority 's first progress report will be published three (3) months after the publication of our first accessibility plan, in December 2023. This progress report will include updates on the actions Great Lakes Pilotage Authority has taken. As specified in the regulations, organizations must publish a revised plan every three (3) years. As such, the Great Lakes Pilotage Authority's first revised accessibility plan will be published in December 2025.

D. Glossary

Barrier

"means 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."

Disability

"means 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."

ICT (information and Communication Technology)

"an extensional term for information technology (IT) that stresses the role of unified communications and the integration of telecommunications (telephone lines and wireless signals) and computers, as well as necessary enterprise software, middleware, storage and audiovisual, that enable users to access, store, transmit, understand and manipulate information."

Web Content Accessibility Guideline (WCAG)

"The WCAG documents explain how to make web content more accessible to people with disabilities. Web "content" generally refers to the information in a web page or web application, including:

- natural information such as text, images, and sounds
- code or markup that defines structure, presentation, etc."