

# **GREAT LAKES PILOTAGE AUTHORITY**

Accessible Canada Act

Accessibility Plan – Progress Report

December 31, 2023

# **GREAT LAKES PILOTAGE AUTHORITY**

## **ACCESSIBILITY PLAN – PROGRESS REPORT**

### **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)

On September 27, 2023 the Great Lakes Pilotage Authority (GLPA) published its first Accessibility Plan which met the requirements of the Accessibility Canada Act. The GLPA's Accessibility Plan's aim is to identify, remove, and prevent barriers in the priority areas which are identified as the organization's policies, programs, practices and services.

This first progress report has been prepared to provide information on the steps taken by the GLPA is implementing the actions identified as part of its plan as per the established timeline and provide information on received feedback.

## General

The principal mandate of the Great Lakes Pilotage Authority is 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](mailto:accessibility-accessibilite@glpa-apgl.com)

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

## 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.

## Progress Report Summary:

This document is the GLPA's first progress report since its accessibility plan was published on September 27, 2023. In the development of its accessibility plan, action items were determined based on the priority areas identified in the Accessible Canada Act. The development and communication of a formal written policy for accommodations was the first step identified in the accessibility plan action plan. As such, the GLPA developed and communicated its Workplace Accommodation Policy and Procedures following the Canadian Human Rights Commission guidelines on the development of a Workplace Accommodation Policy.

Other action elements, which were identified during the development of the GLPA's Accessibility Plan, have been earmarked for completion in 2024. A summary of the Action Plan items to be taken are included as Annex 1 at the end of this document.

Since the date of the implementation of the GLPA's Accessibility Plan, the GLPA has not received any feedback via its feedback mechanism.

# **ACCESSIBILITY PLAN – PROGRESS REPORT**

## **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.

#### **Completed corrective actions:**

##### **1. Development of a Workplace Accommodation Policy**

During the development of its accessibility plan, it was found that the GLPA did not have a formal written accommodation process. As such, the GLPA committed to developing a formal written policy for accommodations and make all staff aware of it. The GLPA developed its Workplace Accommodation Policy using the Canadian Human Rights Commission guidelines.

Adopting a workplace accommodation policy helps foster an environment of respect for human rights and lets people in the organization understand their rights and responsibilities. The purpose of accommodation is to ensure that individuals who are otherwise, able to work are not discriminated against by being excluded from doing so when working conditions can be adjusted without causing undue hardship to the employer. The policy provides an opportunity for employees to have their needs accommodated in the workplace with dignity and respect. This policy applies to all aspects of employment including, but not limited to recruitment, selection, training, promotion, transfers, work arrangements, compensation and benefits.

#### **Future corrective actions:**

##### **1. Arrange an ergonomic assessment to have all office workstations evaluated.**

The GLPA is committed to providing a safe physical work environment which accommodates its employees needs and considers prevention of musculoskeletal injuries. The GLPA will arrangement for an ergonomic assessment of the office workstations to be evaluated and act on resulting recommendations.

2. Provide some awareness training opportunities to increase knowledge and confidence, in order to create a more diverse, inclusive and accessible workplace.

The GLPA will provide training to supervisors and employees to increase awareness of possible circumstances which may require accommodation. The training will also cover other factors such as ethnicity, culture, religion, gender, sexual orientation and sexual identity.

3. 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.

The GLPA will provide additional accessibility training to specific employees based on their specific functions within the organisation in order to address identified opportunities. Training on Web Content Accessibility Guidelines and the creation of accessible communication means will be provided in the second quarter of 2024 in order to provide awareness to GLPA employees on the ways they can improve the level of accessibility of their business interactions and transactions with other employees, customers and stakeholders.

## **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. IN the 2<sup>nd</sup> quarter of 2024. The GLPA has committed to review the washrooms specifically to see if any accessibility features could be added and plan to make those changes and 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

## **2. 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 website is unknown and currently, no one is trained or aware on how to create accessible documents.

### **Actions:**

1. In the 2<sup>nd</sup> quarter of 2024, the GLAP will have an official accessibility review of the website done and plan to improve accessibility where necessary. Training will be provided to GLPA staff who have the responsibility of publishing public facing organizational content on creating accessible WORD and PDF documents. By the 3<sup>rd</sup> quarter of 2024, all content posted to the website will be compliant with WCAG requirements.

## **3. 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. In the 2<sup>nd</sup> quarter of 2024, the GLPA will develop a process for providing alternative formats and communication supports For public facing documents. Current public facing documents will be reviewed for clarity and use of plain language. Standards will be created to provide guidance on the use of plain language in the creation of future public facing documents.

## **4. 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. In the 2<sup>nd</sup> quarter of 2024, the GLPA will develop a policy that specifically states that accessibility will be considered during the procurement process. Education on accessible procurement for managers and any employees that may work with the procurement processes will be provided.

## **5. 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:**

In the 1<sup>st</sup> quarter of 2024, the GLPA will conduct a thorough review of current programs and services to determine the current level of accessibility. By the 2<sup>nd</sup> quarter of 2024, the GLPA will ensure accessibility features are incorporated into all new programs and services prior to implementation and that all new programs and services created in the future will have consideration for accessibility.

## **6. Transportation**

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



## A. 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 Progress Report 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

Great Lakes Pilotage Authority consulted with persons with disabilities to hear from them on the progress regarding their Accessibility Plan. The consultation was conducted in two parts:

1. Key staff members at Great Lakes Pilotage Authority were consulted. Questions regarding accessibility barriers, current accommodation practices, and priorities for remediation were discussed and responses have been used to inform this Progress Report.

2. Accessible Canada Act Review Committee

The Accessibility Progress Report 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 December 28 and 29, 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 Progress Report. Members provided comments on the Progress Report format and readability, accessibility actions as outlined in the Progress Report, suggested timelines for actions, and specific barriers that could be encountered. Committee feedback has been incorporated into this Progress Report.

## B. 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. This document is the first GLPA progress report. It will be published three (3) months after the publication of our first accessibility plan, in December 2023. This progress report includes updates on the actions the GLPA has taken since the publication of its Accessibility Plan. 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.

## ANNEX 1

Action	Timeline	Roles and Responsibilities
Develop a formal written policy for accommodations and make all staff aware of it	Completed	HR Director
Arrange an ergonomic assessment to have all office workstations evaluated	2 <sup>nd</sup> quarter, 2024	HR Director
Provide some awareness training opportunities to increase knowledge and confidence to create a more diverse, inclusive and accessible workplace	2 <sup>nd</sup> 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	2 <sup>nd</sup> quarter, 2024	HR Director
Review the washrooms to see if any accessibility features can be added and plan to make those changes	2 <sup>nd</sup> 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	1 <sup>st</sup> quarter, 2024	HR Director
Have an official accessibility review of the website done and plan to improve accessibility where necessary	3 <sup>rd</sup> quarter, 2024	HR Director
Provide training and support on creating accessible WORD documents and accessible PDF's to be added to the webpage	2 <sup>nd</sup> quarter, 2024	HR Director
Ensure all content posted to the webpage is compliant to WCAG requirements	3 <sup>rd</sup> quarter, 2024	HR Director
Develop a process and information on providing alternative formats and communication supports	2 <sup>nd</sup> quarter, 2024	HR Director
Create standards for public-facing documents for clarity and plain language and provide plain language versions where necessary	3 <sup>rd</sup> quarter, 2024	HR Director

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