

GREAT LAKES PILOTAGE AUTHORITY

Accessible Canada Act

Accessibility Plan – Progress Report

December 31, 2024

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. Following the initial Accessibility Plan, the GLPA submitted its first progress report in December 2023.

This progress report summarizes the steps the GLPA has taken since its last update. It outlines its planned actions, shares timelines, and includes feedback received.

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 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 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 second 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 various stages in the upcoming years. 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. The GLPA has limited exposure to the public in general, since its services are specific to marine pilotage. The GLPA's narrow customer base has direct contacts by phone or emails to our marine pilotage services. They would rarely use the GLPA's website at this time. The GLPA is working on a customer portal which will provide our customers with information related to their business. This will also enhance our customer's exposure to the GLPA's website.

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. Four GLPA employees have received Office Ergonomic Assessment Training provided by Workplace Safety and Prevention Services. These employees are performing ergonomic assessments of the office workstations and promoting awareness of ergonomic wellness amongst office staff. Recommendations resulting from the

ergonomic assessments performed will be evaluated and acted upon. The evaluations will be completed by the end of the 4th quarter. Any gaps will be addressed by reviewing the findings of the ergonomics assessment with the individuals and providing the recommended equipment and training.

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

The GLPA has provided training to all office employees on Diversity, Equity and Inclusion via the course Respect and Inclusion in the Workplace offered by the Canadian Diversity Initiative. This course aims at providing information on the benefits of diversity and inclusion in the workplace and the characteristics of a respectful workplace. This training helps employees recognize situations involving unacceptable behaviours such as discrimination and harassment and how to respond appropriately. Other topics covered in the course are considerations for others and respectful conversations. This training is now a core part of the GLPA's efforts to promote Diversity, Equity and Inclusion.

3. Provide additional accessibility training to targeted 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 accessibility guidelines and creating accessible communication methods will take place in the second quarter of 2025. This training will help GLPA employees learn how to make their interactions and transactions more accessible for colleagues, 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:

In the 2nd quarter of 2024, the GLPA reviewed the accessibility of the office spaces and hallways and has found no barriers to accessibility. The GLPA does have a washroom

which provides some accessibility feature, but it is not wheelchair accessible. The GLPA is looking to increase its office footprint in 2025, and the addition of a wheelchair accessible washroom is planned during the expansion. The CSA B651-12 will be the standard used during this re-design of the GLPA's built environment.

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

Actions:

1. In the 2nd quarter of 2024, the GLPA created an IT Specialist position. Part of their mandate is to review and update the GLPA's website and to make it compliant with government of Canada accessibility standards. The GLPA will retain the services of a qualified consultant to review its website and make it compliant to Web Content Accessibility Guidelines. The target date for completion of this work is 2nd quarter, 2025.

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. The GLPA is Implementing an Integrated Management System (IMS) as per Transport Canada directives. During its implementation of the new IMS, the GLPA must revise its document management system which will include a new document format for all of its Policies, Operating Procedures and Communications. Employment and Social Development Canada (ESDC) offers guidance on the Accessible Canada Regulations: Alternate Formats. These guidelines will be used in the review and update GLPAs documents and will be part of the standard for the creation, revision and publication of new documents and Communications.

2. The GLPA will be providing awareness training to employees who create, modify and review documents on the need to make documents more accessible. An effort to reduce the number of acronyms and to write document in plain language, using acceptable fonts and formatting will also help to make technical or sector specific documents be more accessible. In order to increase the level of accessibility of the GLPA's internal and public facing documents, the GLPA will develop an accessibility checklist based on ESDC's guidance on the Accessible Canada Regulations which will be used by employees who write and revise such documents. This will ensure that accessibility of the GLPA's documents is considered and improved moving forward. The target date for the completion of this training is 2nd quarter 2025.

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. The GLPA is reviewing its procurement policy to include considerations for accessibility. Following guidelines set forth by Public Service and Procurement Canada, accessibility will be considered for all procurement requirements. Accessibility criteria will be included in the specifications of the procurement process so that the goods and services that the GLPA purchases are inclusive by design. Awareness training will be provided to the employees responsible for administering the procurement process.

In the event that it is not appropriate to include accessibility criteria as part of commodity specification or it is unable to obtain goods or services that comply, the GLPA will make note of such limitations as part of its procurement decision. These changes are targeted to be completed by the 2nd quarter 2025.

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:

The GLPA's standards for Design and Delivery of Programs and Services are under review currently within the development of our Integrated Management System. The GLPA's Policies, Programs, and Procedures are under review and consideration for accessibility features will be part of this process.

7. Transportation

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

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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 16 and 18, 2024. 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 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.

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ANNEX 1

Action	Timeline
Develop a formal written policy for accommodations and make all staff aware of it	Completed - 2023
Arrange an ergonomic assessment to have all office workstations evaluated	Completed - 2024
Provide some awareness training opportunities to increase knowledge and confidence to create a more diverse, inclusive and accessible workplace	Completed - 2024
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 nd quarter, 2025
Review the washrooms to see if any accessibility features can be added and plan to make those changes	2 nd quarter, 2025
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	Completed 2024
Have an official accessibility review of the website done and plan to improve accessibility where necessary	2 nd quarter, 2025
Provide training and support on creating accessible WORD documents and accessible PDF's to be added to the webpage	4 th quarter, 2025
Ensure all content posted to the webpage is compliant to WCAG requirements	3 rd quarter, 2025
Develop a process and information on providing alternative formats and communication supports	2 nd quarter, 2025
Create standards for public-facing documents for clarity and plain language and provide plain language versions where necessary	3 rd quarter, 2025
Develop a policy that specifically states that accessibility will be considered during the procurement process	2 nd quarter, 2025
Provide education on accessible procurement for managers and any employees that may work with the procurement process	2 nd quarter, 2025
Conduct a thorough review of current programs and services to determine the current level of accessibility	2 nd quarter, 2025
Ensure accessibility features are incorporated into new programs and services prior to implementation	2 nd quarter, 2025
All new programs and services created in the future will have consideration for accessibility	3 rd quarter, 2025