



# RCMP Accessibility Plan 2023-2025:

Progress Report 2024

December 31, 2024



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# General

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## A Message from Jasmin Breton, Chief Human Resources Officer (CHRO)

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Colleagues,

As Chief Human Resources Officer at the Royal Canadian Mounted Police (RCMP), I am pleased to share our second progress report on “Building an Accessible RCMP: The Framework to Deliver the First Departmental Accessibility Strategy and Accessibility Plan” (the Accessibility Plan). This progress report illustrates our continued commitment to becoming more accessible and to fulfilling our obligations under the “*Accessible Canada Act*” (the Act). As an employer, we aim to create a work environment that is respectful, healthy, and inclusive for all employees. As a service provider, we aim to remove barriers and make services accessible for all.



Coming into effect on July 11, 2019 with a purpose to create a Canada without barriers by 2040, the Act is a major advancement in federal disability rights legislation. It challenges us to be proactive about accessibility and to consult with persons with disabilities to make programs and services accessible from the start. As such, the RCMP’s Accessibility Plan, along with the attached progress report, was developed in consultation with the RCMP’s accessibility community and subject matter experts representing various regions across the country. One of our key accomplishments this past fiscal year was to implement the Accessibility passport and create a Communication Matters pilot course to help Police officers understand the needs of persons with communication disabilities.

The RCMP’s Accessibility Plan is evergreen and will be updated as we continue to learn and grow through consultation and co-development, and within the context of our continuously evolving environment. We all benefit when we make accessibility a part of our every-day considerations. Together, we will achieve a fully accessible RCMP.

Continuing meaningful collaboration with our accessibility and disability communities as we embed an inclusive culture through addressing systemic harassment and discrimination, positions us to fully leverage the workforce of the future, including persons with disabilities, to meet the evolving needs of the RCMP as well as in the communities we serve.

This progress report provides an analysis of what has been done to-date towards implementing

the RCMP's Accessibility Plan and includes highlights and summaries of various undertakings in 2023-24 in an effort to advance equity, accountability and trust with accessibility and disability communities. Within our capacity as a large and distributed federal policing organization, the RCMP is fully committed to leveraging this unique opportunity to meaningfully shape and impact the Government of Canada's accessibility, equity and inclusion goals.

**Jasmin Breton,**  
Chief Human Resources Officer

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## RCMP Accessibility Plan 2023–2025: Progress Report 2024

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### Accountability & Governance

The accountability for implementing the *Accessible Canada Act* in the RCMP lies with the defined Accessibility Leadership. Accessibility related proposals go through the organization's existing governance structure<sup>1</sup> in an effort to ensure that across the RCMP, we are embedding accessibility priorities in order to collectively advance this work.

### Accessibility Leadership

#### Accessibility Lead

- Jasmin Breton, Chief Human Resources Officer (CHRO)
- Shelley Peters, Deputy Chief Human Resources Officer, Equity, Diversity and Inclusion (EDI) Champion.

#### Anti-Racism, Equity, Diversity and Inclusion Secretariat

- Tahanee McKnight, Executive Director, Human Resources Policies, Strategies and Programs and Senior Designated Official for Employment Equity, Diversity and Inclusion
- Supt. Darryl Dawkins, Director, Anti-Racism, Equity, Diversity and Inclusion Secretariat (AREDIS)
- Sayeeda Jaigirdar, Project Lead, Senior Advisor, Anti-Racism, Equity, Diversity and Inclusion Secretariat

### RCMP Governance

#### Level 1 Committees

- Senior Executive Committee
- Communications and Coordination Committee (C+C)

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<sup>1</sup> This is referring to Senior Executive Committee (SEC) and Senior Management Team (SMT)

## Level 2 Committees

- Finance, Information Technology and Human Resources Committee (to be formed)

## Governance Structures

- Departmental Lead for the implementation of the Accessible Canada Act (Jasmin Breton, CHRO)
- Equity, Diversity and Inclusion Champion (Shelley Peters, Deputy CHRO)
- HRPSP Directorate (Tahanee McKnight, Executive Director)
- AREDIS (Superintendent Darryl Dawkins, Director)
- Accessibility Task Force
- RCMP Accessibility and Disability Network
- Pillar Leads (the business units below will own both the responsibility and accountability for the development and implementation of the pillar-specific plans inside the broader Accessibility Plan)
  1. Communication (other than ICT\*) – CHRO and others as identified in the Accessibility Plan. (\*ICT- Information and Communication Technology)
  2. Employment – CHRO and others as identified in the Accessibility Plan
  3. Built environment – Director General of Property Management
  4. Design and delivery of services and programs – Various leads as identified in the Accessibility Plan
  5. Procurement of goods services and facilities – Director General of Procurement and Contracting
  6. Information management and Communication Technology (ICT) – Director General of Information Technologies and others as identified in the Accessibility Plan
  7. Transportation – Director General of Transportation

## Contact information for feedback

Below is a description of our feedback process, which will facilitate the provision of anonymous feedback both internally and externally:

- The present Accessibility Plan and progress reports are to be published on the RCMP internal and external website. They will also be published on open.canada.ca
- The designated person for receiving feedback is Ms. Galina Ivanova, Employment Equity Research Analyst and Project Coordinator, at the following email address: RCMPAccessibility-AccessibiliteGRC@rcmp-grc.gc.ca

- A survey is published on the RCMP website, which will capture employee and client feedback on the implementation of the present Accessibility Plan
- As they are surfaced, issues will be addressed through governance structures
- Periodically as the Accessibility Plan is updated, it will reflect the feedback received
- A person may use the contact information listed to request a copy of the feedback process description in an alternate format
- The RCMP will ensure acknowledgement of receipt of all its feedback if it is not received anonymously
- Feedback received will be acknowledged in the same manner in which it was received unless it was received anonymously

### **Contact information to reach out to the RCMP**

By email:

The designated contact person for receiving feedback or for an accessible version of this document is Ms. Galina Ivanova, Employment Equity Research Analyst and Project Coordinator, at the following email address: RCMPAccessibility-AccessibiliteGRC@rcmp-grc.gc.ca

By mail:

Anti-Racism, Equity, Diversity and Inclusion Secretariat  
73 Leikin Drive  
Mailstop 52  
Ottawa, Ontario K1A 0R2

By toll-free number:

1-833-690-3508

# Pillars under the Accessibility Canada Act

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## Communication, other than information and communication technologies

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### Desired Outcome

The overall desired result for Communication (Other than ICT) is to ensure existing and new communication content are accessible for all users.

### Barriers identified in the Accessibility Plan

- Ambiguous policy and program governances
- Poor leadership awareness or training in Inclusion and Diversity
- Lack of awareness of the needs of the disability community
- Lack of communications in accessible, plain language formats and related training

### How have we progressed in removing or preventing barriers identified in the Accessibility Plan?

Work continues in the RCMP to remove barriers identified in the areas of communication (other than ICT). Policies are being redefined to be less ambiguous and more streamlined. Program governance structures are being realigned to accommodate the needs of persons with disabilities in the RCMP. The organization's Accessibility Pillar Leads Taskforce continues to align the accessibility work that is being done on several pillars.

Diversity and Inclusion, Anti-Racism, and Leadership training continues for senior leadership. For example, the following courses remains mandatory for all employees including senior leadership:

1. Uniting Against Racism Learning Series
2. Cultural Awareness and Humility Course

There is a need to implement more awareness and training on accessibility for senior leadership and employees. The RCMP is now creating performance management objectives for executives to measure progress made in accessibility and inclusion in their teams. This includes awareness of the *Accessible Canada Act* and their obligations to the RCMP Accessibility Plan.

Since the Spring of 2022, the RCMP National Learning Services (NLS) continues to take the necessary steps to educate the division on the importance of accessibility and the requirements of the Act. In this progress cycle, NLS has shifted focus from awareness to planning and laying

the foundation for conversion. They have also begun drafting the Accessible eLearning Strategy, the first of the three strategies to address accessibility in learning within the purview of Learning and Development.

The RCMP fully supports the Government of Canada's (GoC) awareness campaigns, including the National Disability Employment Awareness Month and Persons with Disabilities programming. Key awareness campaigns, resources and tools are being socialized across the organization to promote the full implementation of the Accessibility Strategy on an annual basis. E-newsletters and web pages are fully dedicated to such communications. RCMP employees are invited to participate in such awareness campaigns run by GoC and the Office of Public Service Accessibility (OPSA). This includes training on the passport and other OPSA sessions. The RCMP is also promoting, attending and sharing GoC accessibility network meetings to promote accessibility knowledge sharing across the federal government.

### **Communications Matters: A Communication Strategies Pilot Project for Law Enforcement in Manitoba, Canada**

Project Co-Creators: Adam, B.<sup>1</sup>, Allen, A., MSc SLP CCC<sup>1</sup>, McDougall, A., MOT O.T. Reg (MB).<sup>1</sup>, McRuer, S., MOT, O.T. Reg. (MB).<sup>1</sup>, Whelan, G., NCO i/c<sup>2</sup> Affiliations: Communication Devices Program<sup>1</sup>, and Royal Canadian Mounted Police<sup>2</sup>, D-Division. Winnipeg, Manitoba, Canada

The Communication Matters pilot project team included speech-language pathology, occupational therapy, local law enforcement (Royal Canadian Mounted Police), and individuals with lived experience; including an individual who had been employed as a law enforcement officer (Winnipeg Police Services) prior to their disability.



## Background

In 2019, the Government of Canada acknowledged that people with disabilities are more likely to have encounters with the criminal justice system, whether it is as a victim, a witness or a perpetrator. There is an increased likelihood of:

- Experiencing physical, mental, and/or sexual abuse (Bryen, N.D., 2003, & Togher, M., 2010)
- Experiencing miscommunications with law enforcement officers, and/or the judicial system
- Lacking disability-related supports (Collier, B., 2006)
- Being questioned by law enforcement (Rava, J., 2017)
- Incarceration

To the team's knowledge, despite a variety of legislation, no formal training exists for local law enforcement officers across Canada on how to effectively communicate with people who have speech, language and/or communication disabilities (SLCD).

The pilot project involved a 3-hour presentation for local law enforcement officers and administrative staff. There were various presentation formats used, including:

- Lectures
- Videos
- Case studies
- Interactive sessions

## Focus of Training Content

- Indicators of potential SLCDs
- Background information about specific disabilities that may impact communication
- The differences between brain injury and intoxication were emphasized
- The availability and importance of Communication Intermediaries (CIs) for situations where formal interaction could be scheduled
- Universal communication techniques and strategies were highlighted for in-the-moment interactions

## Course Audit

This course was audited by a Senior Accessibility advisor from NHQ, RCMP and it was found that:

The course was remarkable and resonated with the work that the RCMP is doing on Accessibility. It was engaging on different levels as it was very interactive and the instructors engaged the audience with their excellent knowledge of their subject matter. The instructors also had a very professional manner and their subject matter aligned to the examples that they presented to the audience. The use of communication devices during the pilot also highlighted the requirement and usefulness of these devices in the engagement with persons with communication issues.

The introduction of a former Winnipeg police officer with communication challenges due to a disability was instrumental in highlighting the uniqueness of this course. Everyone was impacted by his struggles and his courage in overcoming the challenges he faced through the use of advanced communication devices. The scenario exercises also highlighted this. There are plans underway to make this course available to all police officers in the RCMP, so that there is greater awareness of individuals with disabilities with communication difficulties may be understood.

### **Virtual Remote Interpretation (VRI) service for sign language interpretation**

The RCMP is committed to supporting the federal government's goal to create a barrier-free Canada by January 1, 2040. To address accessibility-related concerns, the RCMP's Anti-Racism, Equity, Diversity, and Inclusion Secretariat (AREDIS) will oversee the acquisition and rollout of an on-demand Virtual Remote Interpretation (VRI) service for sign language interpretation. Assessments and reviews of current products are already underway, and the pilot phase of the RCMP's VRI program is set to launch in several detachments across British Columbia in early 2025.

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## **Employment**

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### **Desired Outcome**

To recruit, retain and promote persons with disabilities and offer timely workplace accommodations.

### **Barriers identified in the Accessibility Plan**

- A lack of effective employment equity analysis and benchmarking of recruiting, retention and promotions rates for employees with disabilities
- Lack of EDI training and disability management

- Lack of disability recruitment milestones for Public Service employees (PSE), Regular Members (RM), Civilian Members (CM) and students
- Inefficient staffing practices recruitment of persons with disabilities

## **How have we progressed in removing or preventing barriers identified in the Accessibility Plan?**

In 2024, the RCMP continues to work towards the development of a software system that will capture EDI data that will support the organization in conducting employment equity analysis. Analysis will be conducted of the RCMP HR systems and stakeholder sessions are being held to inform the software. Once the software is set up, this will be effective in identifying where systemic barriers exist in staffing processes at the corporate and hiring manager levels, as well as possible solutions.

The RCMP continues to participate in the GoC's modernization of the self-identification questionnaire and Inclusion campaign software systems set up process, and has participated in all stakeholder meetings. The data collected through this new questionnaire will better describe the organization workforce employment equity and diversity, inform recruitment and retention goals, shed light on diversity gaps, and inform RCMP programs and policies.

RCMP Labour Relations Advisors continued their training in disability management, the GoC *Workplace Accessibility Passport* and Accommodation throughout 2023–24. The training is led by facilitators from the RCMP's Accessibility and Disability Network, who are certified as trainers by the GoC Accessibility Office. The Network continues to be a source of consultation for this training.

The following RCMP Staffing initiatives continue to have a positive impact on accessibility:

- In 2020, sub-delegation training moved from in-class, facilitator-led, set schedule to online, self-directed/paced, on demand, which enables the learner to have greater control over the learning experience. Access for persons with physical and learning disabilities improved as the use of Agora in the design/delivery of training meant adoption of industry-standard look & feel (in contrast to non-expert designed PowerPoint decks), which improves accessibility for some with learning/cognitive/visual disabilities.
- In 2021, Inclusive Hiring Practices for a Diverse Workforce (COR120) was integrated in the sub-delegation curriculum.
- In 2023, changes were made to the staffing policy and delegation framework in response to the coming into force of PSEA changes related to bias & barriers in assessment.

In 2024, RCMP Corporate Staffing actively participated in the Anti-Racism, Equity, Diversity and Inclusion Secretariat (AREDIS)led Diversity Retention & Employee Advancement Model (DREAM) workshops by delivering presentations on the promotion process and career planning for all categories of employees. Members of the Corporate Staffing Policies and Promotions (CSPP) team attended these events, in person, ensuring they were present to answer participants' questions and to take part in exchanges to better understand employee experiences to inform future efforts to identify and remove biases and barriers. As the *employer's return to office mandate* is implemented, a strategic consideration from Corporate Staffing would be the need to analyse the impact on persons with disabilities and their participation in staffing processes and subsequent appointments. Corporate Staffing anticipates challenges in promoting the public service as an accessible workplace, and in attracting persons with disabilities talent

The RCMP is also making progress in terms of self-identification/inclusion campaign under the guidance of the Treasury Board Secretariat (TBS) and other initiatives to improve information about diverse groups, including employees and potential employees with disabilities.

As part of TBS's commitment to the 2023 Office of the Auditor General report, it is anticipated that the TBS Self-identification initiative will be launching by December 2024. Self-identification is an opportunity for employees to voluntarily identify as belonging to one or more of the four designated groups listed in the Employment Equity Act which includes visible minorities, Aboriginal peoples, persons with disabilities, and women. Self-identification gives a demographic portrait of the employment equity representation workforce within RCMP. The data collected is used to identify the specific barriers or issues the employees from the designated groups face and helps RCMP plan for the future, monitor progress and take action to maintain workforce representation. RCMP is currently working on a communication plan and will launch a blitz campaign to encourage new and current employees to fill out the questionnaire as accurately as possible. Communication pieces are currently being developed such a Frequently Asked Questions for employees and manager's toolkit to support the campaign and encouraging all employees to participate on the accuracy profile of RCMP workforce.

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## **Built Environment**

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### **Desired Outcome**

To have welcoming, barrier-free access to RCMP buildings, offices and facilities across the country.

## Barriers identified in the Accessibility Plan

Barriers are faced by clients and employees with respect to:

- Accessible parking places not available
- Accessible pathways and doorways
- Accessible washrooms
- Accessible issues with service animals in the workplace

## How have we progressed in removing or preventing barriers identified in the Accessibility Plan?

The RCMP's Real Property and Environmental Management Branch's (RPEMB) Property Management Manual requires that new RCMP-owned and leased facilities are accessible and barrier free and meet the requirements of the Directive on the Management of Real Property, as outlined in Appendix D: Standard on Barrier-Free Access to Real Property. In addition, RCMP Real Property has developed a common design for small-sized detachments which includes inclusive locker room and barrier-free access features. To date, 20 RCMP detachments currently have operational inclusive washrooms, and more than 20 additional projects are planned.

In November 2023, RPEMB signed a Memorandum of Understanding with Accessibility Standards Canada to assist in the creation of common progressive, research-based built environment accessibility best practices and standards to be implemented, where feasible, in RCMP facilities and sites. This agreement allows Real Property to regularly consult Accessibility Standards Canada on standards and best practices to improve technical standards and guidance for the RCMP real property community and make our facilities more accessible.

RPEMB is also engaging with Public Services and Procurement Canada to develop a multi-year plan to complete facility accessibility audits, with a focus on public access space and facilities where the RCMP has specific duty to accommodate requirements.

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## Design and delivery of programs and services

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### Desired Outcome

The overall desired result for Designs and Delivery of Services and Programs is to ensure In-person, phone and online client services are accessible for persons with disabilities.

## Barriers Identified in the Accessibility Plan

- Availability of disability management services for Public Service employees
- Modest understanding of Accommodation, Disability and Disability Management by RCMP Managers, Supervisors and Labour relations Advisors
- Disability Management seen as adversarial by management and employees

## How have we progressed in removing or preventing barriers identified in the Accessibility Plan?

In 2024, RCMP Duty to Accommodate guidelines is being updated and consulted upon with persons with disabilities in this progress cycle. The Government of Canada Workplace Accessibility Passport has been also be launched in 2023-24 training cycle.

Future progress reports will see:

- training for managers on updated disability management guidelines
- program and policy review of, and update of, the Bias Free Policing Program and the Service Animal Program.

Every organization in the federal public administration is subject to the *Canada Labour Code, Part II: Occupational Health and Safety*, and all federal government employees are covered for workplace accidents causing injury and diseases contracted on the job under the *Government Employees Compensation Act (GECA)*, with the exception of regular force members of the Canadian Forces and police officers and civilian members of the RCMP. The three basic components of disability management are prevention, support for recovery, and accommodation.

At the RCMP, Labour Relations works closely with managers to coordinate the accommodation phase of disability management, which includes obtaining information to identify work-related barriers, exploring options for accommodation, and establishing a return to work plan. Public Service Employees have access to leave for injury on duty, workers compensation and long-term disability benefits (disability insurance). Represented employees also have the support of their union representatives to provide them with advice and guidance throughout the process. Currently, disability management is decentralized with the labour relations corporate policy centre operating as a centre of expertise for divisions.

Over the past year, the RCMP consulted with bargaining agents, employee networks and divisional labour relations to identify gaps and to develop options for strengthening disability

management programming for public service employees. In order to promote a better understanding of the duty to accommodate, the Corporate Labour Relations Unit delivered training sessions on topics such as the newly launched *Government of Canada Workplace Accessibility Passport* in partnership with the RCMP Disability and Accessibility Employee Network. It has also developed tools, guidance and communication related to disability and other protected grounds such as family status.

The Chapter on the Duty to Accommodate (Public Service Employees) in the Public Service Manual was also updated, following consultation with bargaining agents via the National Policy Health and Safety Committee, and now includes the updated links and resources such as the *Disability Management Handbook for Managers* and the *Workplace Accessibility Passport Guidance for Managers*. This approach is tailored to ensure that labour relations practitioners and managers are equipped to address workplace barriers and enable the full participation of all employees.

All these activities have been achieved without increasing existing resources. The creation of a disability management unit or center to centralize these services will require moderate to significant investment, which is difficult during a period of budgetary restraint. Despite these challenges, the organization will continue to strive to create a positive work environment based on inclusiveness and equity.

The Government of Canada Workplace Accessibility Passport, lead by Office of Public Service Accessibility (OPSA), is a key initiative aimed at improving inclusivity and removing barriers for individuals with disabilities within the workplace. This Passport allows employees to easily communicate their accessibility needs and ensures that accommodations are readily available across different sectors. In collaboration with OPSA and the RCMP, the initiative includes a series of introduction and training sessions designed to educate RCMP employees, including managers and supervisors, on the effective use of the passport, which were delivered in the Fall of 2024. These sessions help ensure that officers and employees are equipped to meet accessibility requirements, and fostering a more inclusive environment in both workplace and community interactions. This partnership highlights the Government of Canada's broader commitment to creating accessible and equitable workplaces for all Canadians.

The RCMP delivered information sessions to 549 employees on the Accessibility Passport during 2023-24 (see below). Sessions will continue to be delivered in 2024-25.

<b>Date</b>	<b>Group</b>	<b>Number of attendees</b>
October 19, 2023	RCMP National Labor Relations Advisor Teleconference	39
February 6, 2024	RCMP Corporate Management and Controllership 2024 EDI Week	286
May 9, 2024	RCMP GBA Plus Awareness Week English Presentation	37
May 29, 2024	National AccessAbility Week French Session	2
May 30, 2024	National AccessAbility Week English Session	29
July 15, 2024	J Division Labour Management Consultation Committee	18
August 27, 2024	B Division	18
September 3, 2024	National Learning and Development	30
October 2024	National Div, K, G and E	90
<b>TOTAL</b>		<b>549</b>

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## Information and communication technologies

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### Desired Outcome

To ensure our organization has relevant, up-to-date Technology and Information Management infrastructure that meet the needs of persons with disabilities.

### Barriers Identified in the Accessibility Plan

- Training and support for adaptive IT tools and technologies required
- Accessible documents in the workplace required
- Accessible Learning content required
- Detailed accessibility assessment of HRMIS required

### How have we progressed in removing or preventing barriers identified in the Accessibility Plan?

In 2024, the RCMP continues to create and maintain internal and external committees to implement and monitor progress. This will also kick start the process of creating an Information and Communication Technologies framework for accessibility, with input from employee networks. In the near future, processes will be put in place to enhance training and support for adaptive IT tools and technologies

National Learning Services (NLS) within Learning & Development (L&D) have been working towards creating accessible training since the Spring of 2022 and with the each passing year, the understanding of accessibility grows and the ability to overcome the challenges the RCMP faces improves.

In 2024, the focus became less about awareness and more about planning and laying the foundation for eLearning course conversion. NLS has begun drafting the Accessible eLearning Strategy, the first of three strategies to address accessibility in learning within the RCMP.

Below is the status of ongoing work by NLS in 2023-24:

<b>Activity</b>	<b>Status</b>	<b>Comments</b>
Continue upskilling of instructional designers and multimedia developers through training, webinars, sharing of best practices with OGDs, etc.	Ongoing	Several designers and developers have completed formal or informal training on designing for accessible learning. Additional efforts will be undertaken to ensure all RCMP learning specialists have the knowledge and skills needed.
Create guides and templates to support instructional designers in designing accessible eLearning content	In progress	
Create a more agile and collaborative design and development process, creating eLearning products from start to finish with accessibility in mind	In progress	
Develop an accessible eLearning template and begin testing	In progress	Template developed. Creating prototype product for testing.
Gather business/technical requirements to prepare for a Request for Proposal to acquire an accessible cloud-based Learning Management System to be used enterprise-wide for all learning	In progress	Initial gathering completed; further consultation to be done.

<b>Activity</b>	<b>Status</b>	<b>Comments</b>
Develop a draft Learning Accessibility Strategy, first focusing on online training	In progress	First draft ready for internal reviews
Establish NLS standards and communicate expectations for anyone wanting to create or share learning on the Learning Management System	In progress	Shared with Depot and some RCMP divisions, and worked with other partners to incorporate into their checklists.

Some of the work being done around computer applications systems and the challenges posed are as follows:

Microsoft Power Portal applications, which are being developed, not the older Java/WebLogic applications, have issues with accessibility and responsiveness, they do not work well on smaller devices like phones or tablets.

On the other hand, the older Java-based applications are mostly compliant with the Web Content Accessibility Guidelines (WCAG), allowing for better control over how content is shown to users.

However, Microsoft Power Portal applications provide developers with much less control over the HTML code that determines how the content is displayed to users.

This lack of flexibility makes it harder to fix accessibility and design issues. In contrast our Java-based environments give developers almost full control over the content's HTML, allowing them to easily adjust and ensure that the applications meet accessibility and design standards.

Even properly applying the WET(Web Experience Toolkit) templates to the Power Portal applications has been challenging for the teams working on them. These applications are also non-responsive and struggle to work on smaller screen devices. In contrast, Java applications don't face these issues

On the Power Platform/Dynamics side, the RCMP is working with Microsoft to address accessibility issues. The RCMP (Martin Richer team) have a link that tracks the accessibility problems with Microsoft products, showing them as they get fixed.

For other teams, there's not enough oversight in the development process to make sure accessibility, security, and user experience are applied consistently. This means applications do their best to meet these goals, but without clear guidelines that fit our system. This is why the RCMP needs a Systems Architect (SA) to lead development and organize the custom development teams so they can work together toward shared goals. This is something that will be looked into.

Some teams understand the challenge of making government applications accessible using the Web Experience Toolkit (WET), which gives these apps a consistent look. However, WET must be implemented correctly to ensure accessibility, and it's not just about using the templates as they are. Often, the focus on delivering features is stronger than the focus on accessibility or security. The RCMP needs to shift from its current "waterfall" method to a more flexible "agile" approach, with a focus on quality assurance and realistic timelines.

There is automated accessibility testing that can be done once our DevSecOps pipelines are approved. This will help ensure all applications are tested for accessibility during the build process. This *article* does a good job of explaining that accessibility testing can't be fully automated because automated tools can only check for known code patterns that miss accessibility features. The final test needs to be done on various devices to see how accessible the application really is. Some SaaS tools, like the one mentioned in the article, might help, but the RCMP needs to figure out what accessibility challenges users face. Then, development teams can start by addressing the needs of known users and grow from there.

The RCMP is looking at ways to work with Canadian Digital Services and the Communications Security Establishment to improve our development processes and DevSecOps implementations.

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## **Procurement of goods, services, and facilities**

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### **Desired Outcome**

To ensure accessibility criteria are considered when buying goods, services and facilities, and products include accessibility features where appropriate.

### **Barriers Identified in the Accessibility Plan**

- Need for procurement and contracting processes that reflect accessibility-related goods and

- services to support employees and clients with disabilities
- Lack of central fund for the purchase of workplace related goods and services to facilitate accommodation.

## **How have we progressed in removing or preventing barriers identified in the Accessibility Plan?**

The RCMP is continuing to create the governance structure to create and maintain internal and external committees to implement and monitor progress. Between 2023 through 2025, the RCMP will ensure accessibility criteria are fully understood and included as part of performance indicators. Here are some of the highlights for this year:

- The RCMP Procurement Strategy Review (PSR) form requires that the Procurement Officer documents procurement considerations related to accessibility by summarizing how the requirement includes accessibility criteria or otherwise indicate that an attestation, the Accessibility Justification form, signed by the client is on file.
  - Direction provided to RCMP Procurement Officers is based on requirements identified in the *Accessible Canada Act (Act)*. The Act seeks to create a barrier-free Canada through the proactive identification, removal and prevention of accessibility barriers in seven priority areas, including the federal procurement of goods and services.
  - The following resources are provided as references to consider when working with the business owner:
    - PN-142 Procurement Requirements for Accessibility
    - Accessibility Learning Series
    - Accessibility Hub
- The National Procurement Policy Centre (NPPC), reviews accessibility considerations included in the PSR and provides feedback during quality control pre-reviews, including consideration of rationales for when accessibility does not apply. Procurement officers are also encouraged to send their Statutory Orders and Regulations (SOR) / Statement of Work (SOW) to the Accessible Procurement Resource Centre (APRC) for feedback on where accessibility considerations could be included.
- Training sessions on how to incorporate accessibility into procurements are offered on a regular basis by the Accessibility team at PSPC. NPPC encourages attendance at these learning sessions by sending reminders and meeting invitations to the Procurement community.
  - In the most recent training session, APRC reminded the attendees that there is a wealth of information on their GCpedia page.

- APRC is working on developing reference materials for Procurement Officers to use when developing solicitations for goods and services, which will include suggestions for common accessibility considerations. RCMP Procurement will leverage this material once available.

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## Transportation

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### Desired Outcome

To ensure the RCMP's transportation framework embeds accessibility and aligns with all accessibility requirements.

### Barriers Identified in the Accessibility Plan

- Lack of guidelines for accessible transportation to RCMP facilities in every region.
- Updated review of transportation network.

### How have we progressed in removing or preventing barriers identified in the Accessibility Plan?

In 2024, the RCMP is continuing to create the governance structure to maintain internal and external networks to monitor progress. This will commence the review of the transportation framework including policies, programs, procedures and infrastructure (i.e., vehicles). In the near future, the organization will update, streamline and improve processes for meeting the needs of employees with disabilities for adaptive transportation tools and technologies, including guidelines for accessible transportation in every region.

In an effort to meet the needs of employees with disabilities, the RCMP will consult with other similar operational government departments, the Persons with Disabilities networks and internally to assist in identifying accessibility strategies. Given the geographical dispersion of the RCMP over 700 detachments and policing across the country, often in remote and/or thousands of small communities with limited resources, the RCMP does not provide an internal transportation network for employees or the public. The public relies on locally provided transportation options in those communities should they wish or need to travel to an RCMP office. In communities where there is no transportation network the RCMP officer may choose to travel to the public's residence or business to conduct police work and or consider alternative methods to address accessible transportation when the need is known.

The RCMP provides transportation resources to its Police Officers in the performance of policing operations and limited transportation options for Public Service Employees for the performance of their duties, which on occasion may also include employees with accessibility needs. Based on this, consultation will be key in ensuring the success of the transportation pillar as it relates to the RCMP Accessibility Plan. It should also be noted that accessibility needs are currently addressed on a case-by-case basis while the RCMP continues to advance the transportation framework related to accessibility.

# Consultation

The present Accessibility progress report leverages input from employees, partners, and clients, particularly those who identify as persons with disabilities, that was received through a variety of consultation and engagements, which will remain an ongoing element of this Plan. Consultation plans and progress reports will also be forthcoming as a result of these ongoing consultations.

The following section outlines the ways through which the RCMP has consulted with employees who identify as persons with disabilities and members of the public in matters related to accessibility, accommodations, barriers, harassment and discrimination, and other experiences with respect to accessibility at the RCMP, as well as analysis of the results from these consultations.

## **RCMP Disability and Accessibility Network**

The RCMP launched its Disability and Accessibility Network in September 2022. Its mission is to advocate for disability- and accessibility-related issues by identifying and communicating best practices and solutions to challenges faced by employees with disabilities. The network consists of employees from all categories of employees—Regular Members, Civilian Members and Public Service Employees—in our organization and will provide input and advice to the Accessibility leadership, the Anti-Racism, Equity, Diversity and Inclusion Secretariat, the RCMP senior management team, and the National Council for Diversity and Inclusion to improve the working environment for all employees with disabilities. The network continues to be a resource and support for the Accessibility taskforce members in various areas such as the Government of Canada Workplace Accessibility Passport implementation, disability management and accommodation advice.

## **Interdepartmental HR Advisory Committee on Persons with Disabilities**

The RCMP has supplemented its internal consultations by reaching out to interdepartmental groups such as the Interdepartmental HR Advisory Committee on Persons with Disabilities, allowing for greater perspective, a wider range of representation of various disabilities and the additional expertise of interdepartmental subject matter experts and opportunities for sharing valuable resources. The network continues to be a source of valuable information for the RCMP.

## **Interdepartmental Accessibility Community of Practice**

The RCMP has also supplemented its internal consultations by reaching out to the Interdepartmental Accessibility Community of Practice . It has led to wider perspectives as well as more representation of various disabilities and expertise.

## **Government of Canada Workplace Accessibility Passport Adopter Community of Practice**

The RCMP has also been active in participation of this network. This Government of Canada Workplace Accessibility Passport Adopter Community of Practice also consists of PWD that the RCMP has consulted with on the Accessibility Plan and the progress report. The community has led the training of a RCMP facilitator for the Government of Canada Workplace Accessibility Passport. This training has led to Labour relations Advisors being trained on the Passport and the start of a roll out of a RCMP wide training in the Accessibility Passport in 2023-24.

## **The Office of the Public Service Accessibility (OPSA)**

The OPSA was established to prepare the Public Service to meet or exceed its obligations under the Accessible Canada Act. OPSA's mandate is to:

- Develop and launch an Accessibility Strategy for the Public Service and implementation plan;
- Provide expert advice, leadership and coordination to departments and agencies to implement the requirements of the Act; and,
- Develop targeted initiatives to help improve workplace accessibility.

The RCMP published its *first Accessibility Plan* in January 2023. Since then, it has consulted with members of the OPSA who have lived experiences of disabilities. Members also participated in the first meeting of the RCMP Accessibility Taskforce and contributed much to the Taskforce's understanding of the RCMP's accountabilities under the Act. OPSA has also trained facilitators in the RCMP to deliver the passport.

## **The Accessibility Network**

The Accessibility Network is a GoC network consisting of public servants who are leading the Accessibility work in their respective departments. It is also comprised of persons with disabilities and in turn consults with other interdepartmental networks. The RCMP is a member of this network and has consulted the network on the RCMP Accessibility Plan as well as the RCMP Accessibility Progress report, among other matters related to Accessibility.

## **The Canadian Human Rights Commission**

The Canadian Human Rights Commission (CHRC) has inspected the first RCMP Accessibility Strategy and Accessibility Plan and has offered valuable insights and improvement pathways that the RCMP is now implementing in the Plan and in this progress report. The CHRC has also

offered valued discernments as to how to consult with persons with disabilities and how to report on it through the Plan and the progress report. This collaborative approach that the CHRC has taken in its inspection process has aided the understanding of the Accessible Canada Act and the concerned legislation for the RCMP.

## **2023-24 RCMP Accessibility Survey for Employees**

The 2023-24 RCMP Accessibility Survey for Employees was conducted from December 18, 2023 to March 11, 2024. The survey measured RCMP employees' opinions related to how the RCMP is implementing its accessibility plan and the various barriers encountered by RCMP employees. The information collected allows the department to measure the effectiveness of work underway and inform the progress report and future iterations of the RCMP's accessibility plan.

The survey was aimed at RCMP employees who are living with a disability, supervisors and managers of employees who are living with a disability and allies or concerned employees for a person living with a disability. Those not belonging to one of those three categories were exited from the survey.

Of the 1,775 employees who initially responded to the survey:

- 23% [412] indicated they were living with a disability
- 24% [434] indicated they were a supervisor/manager
- 15% [265] identified as an ally or a concerned employee for a person living with a disability
- 50% [883] answered none of the above

As per the survey design, those that responded none of the above, were exited from the survey. Of the remaining participants, 49 % were public service employees, 36 % were regular members, and 11% were civilian members. Over half of respondents were women, almost 10 % identified as 2SLGBTQI+, 6% identified as an Indigenous Person, and 18 % identified as a Member of a visible minority group. Of those that continued the survey, the response rate for persons with a disability was approximately 61%.

Nearly half of respondents indicated they have experienced systemic barriers, including those related to promotion and attitudinal barriers. In terms of accessibility awareness, nearly half of employees with a disability indicated they were aware of accessibility services available at the RCMP. Moreover, the majority of respondents felt they could discuss their disability or barriers experiences at work with their supervisor/manager.

Results indicated that over half of respondents identified that a mental health disability applied to them followed by chronic health issues. Half of respondents indicated that they have not self-identified as a person with a disability in the self-identification questionnaire in HRMIS or the Treasury Board Application Portal<sup>2</sup>.

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<sup>2</sup> On April 1st, 2024, 671 RCMP employees self-identified as a person with a disability (Source: HRMIS data as of 2024-04-01, provided by the HR A&BI unit). Readers should note that not all employees who belong to an employment equity group choose to self-identify.

# Feedback

## How are we implementing our Accessibility Plan in the RCMP and fostering Accessibility?

These are some of the steps the RCMP is taking to embrace diverse identities, perspectives, and experiences in and across our organization. The paragraphs below highlight some of the progress made in implementing the Accessibility Plan and fostering Accessibility at the RCMP.

In September 2022, the first RCMP Disability and Accessibility Action Group and Network was launched, which marked a turning point for the organization to consider perspectives and lived experiences of people with disabilities, both employees and members of the public. This network is providing guidance in various areas of accessibility, including leading the Government of Canada Workplace Passport sessions, providing support and input to Accessibility Taskforce heads, and identifying issues in the workplace. It also provides support and information to persons with disabilities in the organization.

As such, in January 2023, the first-ever RCMP Accessibility Plan for identifying, removing, and preventing barriers to accessibility was tabled. This is the second progress report which highlights the roll out of the implementation of the Plan.

In Fall 2023, the RCMP launched the RCMP Accessibility Survey for Employees. The Survey collected information on workplace accessibility, accommodations and barriers experienced by employees, and those living with a disability, pertaining to: employment lifecycle, information and communication technology, built / physical work environment, and communications. The survey ran from December 2023 to March 2024. A concise result of the survey is described on the previous page. Further breakdown of results will be forthcoming.

The Government of Canada Workplace Accessibility Passport is being adopted at the RCMP. Labour relations advisors, who have been trained by the RCMP's Accessibility Passport Facilitator, are advising RCMP managers across Canada on facilitating the Accessibility Passport for employees with disabilities. In addition, in the fall of 2024, there is organizational training for managers, supervisors and employees.

The RCMP Accessibility Task Force continues to facilitate the implementation of the Accessibility Plan. The Accessibility Task Force is comprised of DGs from the Accessibility Pillars and attended by a member of the RCMP Disability and Accessibility Network. The taskforce centers a "nothing about us without us" approach on all activities and has embedded consultation and co-design into its terms of reference. The taskforce has met with the AREDIS team on many occasions to discuss the various stages of the implementation of the Accessibility Plan. Taskforce members have also consulted with the RCMP Disability and Accessibility

Network on various aspects as Disability management, Evacuation plans, built environment designs, Government of Canada Workplace Accessibility Passport implementation plans, etc.

### **What barriers have people who interact with RCMP encountered?**

Some of the barriers faced by employees and clients are as follows:

- Ambiguous policy and program governances;
- Poor leadership awareness or training in Inclusion and Diversity;
- Lack of awareness of the needs of the disability community;
- Lack of communications in accessible and plain language formats;
- A lack of effective employment equity analysis and benchmarking of recruiting, retention and promotions rates for employees with disabilities; other barriers are under the Accessibility pillars

### **How have we considered the feedback we received?**

The feedback that was received from various clients, and employees have been considered in the RCMP Accessibility Strategy and Plan and this progress report. Some of feedback is being implemented as reported under the various pillars in the preceding pages. Most of the feedback will be implemented in the next year.

# Conclusion

The RCMP continues to take deliberate action toward building a diverse, inclusive and accessible organization equipped to provide modern policing services. In the face of these and other evolving priorities, the RCMP remains focused on providing service excellence to Canadians and in all of the communities in which we serve.

The Accessibility Strategy and Plan and this Progress report reiterates this commitment. It was developed in consultation with employees with disabilities and subject matter experts representing various perspectives from across the country. As we look towards the future as an organization, we are committed to the RCMP Accessibility Statement and Vision and to ensuring enhanced accessibility for its employees and the public in the years ahead:

*The RCMP will have identified and addressed barriers within its direct control, resulting in employees and clients with disabilities having every opportunity to participate fully and equally in an inclusive, barrier-free environment where they are supported to realize their full potential and feel they truly belong.*

# Annex A – Definitions of Disability

Source:

- *Treasury Board of Canada Secretariat*
- *Federal Disability Reference Guide*

Below is a list of acts and definitions pertaining to disability, persons with a disability and, disabled.

## **Employment Equity Act (section 3)**

Persons with disabilities means persons who have a long-term or recurring physical, mental, sensory, psychiatric or learning impairment and who:

- (a) consider themselves to be disadvantaged in employment by reason of that impairment, or
- (b) believe that an employer or potential employer is likely to consider them to be disadvantaged in employment by reason of that impairment,

and includes persons whose functional limitations owing to their impairment have been accommodated in their current job or workplace.

The Employment Equity Team at TBS is now using the French term “Personnes en situation de handicap” which aligns with international usage and replaces the legislative term “Personnes handicapées” that appears in the Employment Equity Act and the Employment Equity Regulations. The legal definition has not changed.

## **Accessible Canada Act (section 2)**

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.

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.

### **Canadian Human Rights Act (section 25)**

Disability means any previous or existing mental or physical disability and includes disfigurement and previous or existing dependence on alcohol or a drug.

### **Public Service Superannuation Act (section 3)**

Disabled means incapable of pursuing regularly any substantially gainful occupation.

### **Canadian Charter of Rights and Freedoms**

Equality rights are intended to ensure that everyone is treated with the same respect, dignity and consideration (i.e. without discrimination), regardless of personal characteristics such as race, national or ethnic origin, colour, religion, sex, age, or mental or physical disability, sexual orientation, residency, marital status or citizenship.

### **United Nations Convention on the Rights of Persons with Disabilities (Preamble)**

(e) Recognizing that disability is an evolving concept and that disability results from the interaction between persons with impairments and attitudinal and environmental barriers that hinders their full and effective participation in society on an equal basis with others.