

**NATIONAL SECURITY AND
INTELLIGENCE REVIEW AGENCY
Accessibility Plan – First Progress
Report
December 2023**

National Security and Intelligence Review Agency
Accessibility Plan – First Progress Report, December 2023
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FROM THE EXECUTIVE DIRECTOR

In accordance with the *Accessible Canada Act*, I am pleased to table the National Security and Intelligence Review Agency's (NSIRA) first progress report to its Accessibility Plan 2022 – 2025. This progress report describes the work that has been done to implement activities over the course of 2023.¹

As noted in our inaugural plan, accessibility is a work in progress. The Review Agency and the NSIRA Secretariat have made advances on several fronts, however there is more work to be done. Despite the best of intentions, it is apparent that some of the timelines were optimistic given the organization's small size and the need to wait for work to be completed by other departments or agencies.

Most of the activities identified for completion in the first year were focused on increasing awareness and improving accessibility for the workforce and in the workplace. Consequently, for this first progress report consultations were limited to engaging with members of the NSIRA Secretariat's workforce who offered their insights as persons with disabilities. The information provided by employees reinforced the importance of seeking input from persons with disabilities to identify and resolve barriers.

Through the combined efforts of growing internal capacity and new service level agreements with other public service organizations, NSIRA hopes to be better positioned to address areas that fell behind in 2023. We are optimistic that the coming year will provide an opportunity to double down on efforts to ensure that accessibility is integrated in an effective and sustainable manner in all aspects of the Review Agency's and the NSIRA Secretariat's work.

John Davies
Executive Director, NSIRA Secretariat

¹ In this report, references to 2023 mean the period starting January 1 and ending December 31, 2023.

GENERAL

The Executive Director of the NSIRA Secretariat, who is the deputy head and employer, leads the Secretariat that supports the Review Agency in the fulfillment of its mandate under the *National Security and Intelligence Review Agency Act*. The Secretariat is responsible for monitoring feedback to evaluate progress and to determine its future accessibility plans.

In compliance with the requirements of the *Accessible Canada Act* ("ACA") and the Accessible Canada Regulations, this progress report is available on NSIRA's website, which is used to communicate with the public.

To request a copy of this report, the accessibility plan, or a description of the feedback process in an alternate format² or to provide feedback about NSIRA's progress report, the accessibility plan and any barriers encountered in dealing with NSIRA, please contact the undersigned by mail, telephone, or email.

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² Alternate formats include print, large print, Braille, audio format or an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities.

INTRODUCTION

The National Security and Intelligence Review Agency published its Accessibility Plan 2022 – 2025 in December 2022. This first progress report describes the work that has been done to implement activities between January 1 and December 31, 2023.

The Accessibility Plan 2022 – 2025 set out three priority areas to improve accessibility:

1. Increasing staff awareness about accessibility and the barriers that limit access for Canadians with disabilities.
2. Ensuring Canadians have access to NSIRA's publications and services.
3. Continuing to advance a culture of respect and inclusion by integrating accessibility in all aspects of the organization's work.

Through the efforts of the Senior Advisor, Wellness Initiatives, the NSIRA Secretariat can monitor progress, identify areas for improvement, and ensure overall coherence across the activities outlined in the accessibility plan.

Progress with respect to the priority areas and the accessibility plan is set out on the following pages. It is organized according to the seven key areas outlined in the *Accessible Canada Act* namely: employment; built environment; information and communication technologies (ICT); communication other than ICT; procurement of goods, services, and facilities; design and delivery of programs and services; and transportation.

The Review Agency and the NSIRA Secretariat were able to make advances on several fronts, however delays in staffing, stringent security requirements, and the organization's small size meant activities did not progress as quickly as initially anticipated. The NSIRA Secretariat does not have ultimate control over certain fundamental aspects related to the built environment, technology, or security and must, therefore, adjust its pace to align with the direction given by the responsible policy centres.

PROGRESS VIS-À-VIS ACCESSIBILITY PLAN

1. Employment

While developing the accessibility plan, the NSIRA Secretariat identified gaps with respect to employment. There was no written accommodation process for persons with disabilities employed in the NSIRA Secretariat. Furthermore, there was limited information available about accessibility requirements, resources, and information.

Status: On track

The NSIRA Secretariat was able to make advances in relation to many of the priorities with respect to employment. The Manager, Human Resources Services was joined by the Senior Advisor, Wellness Initiatives, midway through the year. Together they worked on 14 specific cases in 2023 to ensure that employees received the accommodations they requested to enable them to participate fully in all aspects of their work experience. Additionally, the following progress was made:

- Duty to accommodate training was developed and delivered to all human resources staff and managers in February 2023.
- Work is underway to make available a series of "how to" guides and a calendar of events for HR advisors, managers, and employees early in 2024.
- The NSIRA Secretariat launched a new SelfID questionnaire in 2023, which was completed by all term and indeterminate employees. The data shows that the representation of persons with disabilities currently stands at 19.5%.
- Performance measures and indicators relative to employment are under development, which will enable the NSIRA Secretariat to review selection practices to identify and prevent or mitigate barriers.
- All recruitment and staffing material and communications with candidates at all stages of hiring processes include information about accommodations and accessibility. For example, invitations to interviews or to written exams clearly indicate that accommodations are available upon request.

- A new feedback questionnaire was developed and launched in November 2023, to systematically seek feedback from candidates about the effectiveness of accommodation measures in selection processes.
- A second feedback questionnaire was developed and launched in October 2023 to seek feedback from NSIRA Secretariat employees about barriers, gaps, appropriateness, and timeliness of workplace accommodations. (See the section entitled "Feedback" for more information.)
- Employees and managers received training on the Government of Canada Workplace Accessibility Passport (GCWAP) in February and May 2023. Managers and employees are routinely encouraged to use GCWAP.
- The Senior Advisor, Wellness Initiatives, introduced a standard operating practice to consult with other organizations to increase awareness of accessibility and to develop accommodation strategies for NSIRA Secretariat employees. Additionally, the Senior Advisor coordinates with the Communication Security Establishment (CSE), Privy Council Office (PCO), RCMP, and ergonomic firms as needed to develop individualized approaches.
- Electronics must undergo specialized screening before they can be brought into the workplace. This type of security screening falls outside the control of the NSIRA Secretariat, which has requested expedited screening of electronics intended as an accommodation measure. The NSIRA Secretariat has set up a small inventory of screened equipment to further accelerate the process.
- A new workshop entitled Accommodations at NSIRA was developed and delivered in May 2023. It will continue to be offered at least annually during National Accessibility Week. Accessibility awareness is routinely discussed at various occupational health and safety committee meetings.
- Accessibility awareness and accommodation measures are now featured in training offered to HR staff and managers, as well as new employee orientation and on-boarding. Every letter of offer includes a point of contact with whom employees may confidentially discuss their accommodation needs.

2. Built Environment

The accessibility plan reported barriers in the built environment including heavy doors without automatic door openers; airlocks between doors; tripping hazards; narrow corridors; lack of accessible signage; restrictions with respect to assistive devices and job aids; an emergency alert system that flashes lights but does not emit an audible alarm; lack of control over lighting or temperature within the office space; and an outdated building emergency evacuation plan. Some of the barriers were tied to requirements of the Treasury Board Policy on Government Security and other policies that apply to the NSIRA Secretariat, but for which it is not the author.³

Status: Ongoing

The NSIRA Secretariat made some inroads incorporating accessibility requirements into the built environment, but progress was slow. Delays can be attributed to two main reasons. First, NSIRA's built environment is subject to standards established by Public Services and Procurement Canada (PSPC) and the CSE. Second, there was a lot of staff movement, which was compounded by delays in staffing. The following provides additional detail about progress in respect of the built environment:

- The NSIRA Secretariat identified the need for updated standards to PSPC and CSE and will continue to emphasize the importance of accessibility assessments in the built environment in its ongoing discussions with PSPC and CSE.
- Efforts to develop an action plan to remove and/or mitigate barriers, such as text to voice platforms, audible and visual alerts, signage, etc., have advanced slowly because of delays staffing.
- In partnership with CSE and PCO, work is underway to develop and document a process to procure and enable the use of medical/assistive devices and adaptive technology in the workplace. This work is being done in consultation with the Senior Advisor, Wellness Initiatives.
- Alternate arrangements were established on a case-by-case basis to address accessibility issues prior to individuals attending a site or office. This involved working in partnership with managers and corporate services. Delays in staffing may affect the extent to which alternative arrangements are delivered on a consistent and timely basis.

³ In accordance with the *Financial Administration Act*, the Treasury Board of Canada establishes certain mandatory policies that apply across the Public Service.

- The NSIRA Secretariat created a process to identify employees who need assistance in a building emergency and evacuation, which was deployed for a drill in the fall 2023. The NSIRA Secretariat is continuing to work with the building senior managers of the Courts Administration Service and the Department of Natural Resources Canada, who are responsible for establishing the Building Emergency Procedures at NSIRA's two worksites. ⁴
- The security component of new employee on-boarding has been reviewed to identify barriers or gaps for persons with disabilities. Revisions are underway and the updated content will be launched early in 2024.

3. Information and Communication Technologies

The accessibility plan identified barriers with respect to information and communication technologies (ICT), notably that neither the intranet website, nor the internet website were fully accessible. Documents on both websites were not designed with accessibility in mind. Individuals bringing a complaint did not have the option to bring a complaint through any means other than by completing a templated form and persons with a hearing impairment had limited options for engaging with the Registrar.

Status: Ongoing

The NSIRA Secretariat's Information Management (IM) and Information Technology (IT) team had several important priorities to tackle in 2023, one of which was a well-functioning internet website that adheres to accessibility standards and is compliant to Web Content Accessibility Guidelines (WCAG). This was accomplished in November 2023. The IM and IT team is understaffed and therefore has not been able to undertake all the activities identified in the accessibility plan. The team has still made some small progress in the following areas:

- Work planning to review and modify accessibility of previously published documents, including fillable forms to ensure they are WCAG 2.0 compliant has been initiated and will continue.
- Preliminary and informal discussions have been initiated drawing on the experiences of NSIRA's existing workforce to better understand the

⁴ The National Security and Intelligence Review Agency is not the primary or only tenant in either location but works in cooperation with the lead senior managers for emergencies and evacuations in both buildings.

types of barriers encountered as persons with disabilities and the challenges associated with accommodating their needs.

- The NSIRA IT providers are the PCO and the CSE and both deliver their IT services with their own service model. There is a Memorandum of Understanding (MOU) between the CSE and the NSIRA as well as a MOU between the PCO and the NSIRA for the respective IT services. The NSIRA relies on these two different IT providers, which own their respective IT network and which the NSIRA Secretariat uses to communicate and collaborate; these IT providers control, monitor, manage and maintain the IT equipment on their respective networks. The NSIRA has no control over the hardware or the software that can be used on any of the networks to which it has access. Both service models are perceived not to be designed to be flexible and adaptable to meet the specific accessibility requirements of the NSIRA. In this context, the NSIRA Secretariat has already informally engaged these two partners to address accessibility in the interim. The NSIRA Secretariat will formally engage both partners to discuss tangible and sustainable solutions or means regarding accessibility in IT service delivery going forward.
- Training for all staff about creating accessible documents and using other accessibility features available through ICT has been delayed due to a lack of resources. The Corporate Services team will inform NSIRA Secretariat employees early in the new year about training, information sessions, and online tools offered by other Government of Canada departments.
- The NSIRA Secretariat's Webmaster completed some training in which some concepts of WCAG 2.1 were taught. Training for other employees who draft reports, publications, and other publicly available material will begin in the second year of the Accessibility Plan 2022–2025. In the interim, the Webmaster will continue to ensure that material posted online is WCAG 2.0 compliant.
- The work to incorporate digital tools to enhance accessibility with respect to the complaints process is delayed. As opposed to simply adapting existing forms, the NSIRA Secretariat has determined that a new complaints portal must be developed. Accessibility will be incorporated into the design and development of the new portal.

4. Communication other than ICT

The accessibility plan aimed to address several barriers with respect to communication for staff and members of the public including the absence of a process to provide alternate formats and communication support upon request. Other barriers included technical or sector-specific language in public facing documents and reports, as well as lack of guidance or established procedures for use of closed captioning, sign language interpretation, or TTY for persons with a hearing disability.

Status: Ongoing

In 2023 the NSIRA Secretariat engaged the services of a communications expert, a partner of the Five Eyes Intelligence Oversight and Review Council (FIORC), to develop a new communication strategy, which reviewed internal and external communications, as well as stakeholder engagement practices. The strategy identified key priorities for improving NSIRA’s output, engagement, and reputation, including recommendations for a new public-facing website. The NSIRA Secretariat is in the process of recruiting a Communications Manager, whose responsibilities will include implementing the communication strategy and leading on the communications activities identified in the Accessibility Plan 2022 – 2025. Progress was achieved on the following in 2023:

- The NSIRA Secretariat’s Review Report Style Guide ensures that all review reports are written in accordance with accessibility guidelines published by Employment and Social Development Canada.
- The Review Report Style Guide is an evergreen document. Additional changes are underway, which will be more explicit about what to include/consider from an accessibility perspective.
- The NSIRA reports published in 2023 were available in HTML and PDF and included alt text for all graphics and images. Alt text was also included for posts on X (formerly known as Twitter).

5. Procurement of Goods, Services and Facilities

Although no barriers were identified with respect to the procurement of goods, services and facilities, the accessibility plan nevertheless noted that improvements could be made to ensure “accessibility by design” in procurement practices.

Status: Delayed

Due to a lack of staff, the NSIRA Secretariat was unable to carry out its planned activities for incorporating accessibility by design in its procurement practices. The NSIRA Secretariat recently negotiated a service level agreement with another public service organization and will explore integrating accessibility into the services offered in the new year.

6. Design and Delivery of Programs and Services

An important part of NSIRA's mandate is to investigate complaints related to activities carried out by the Canadian Security Intelligence Service and the CSE, as well as complaints related to the denial or revocation of security clearances, and other matters under its purview. Ensuring that Canadians with disabilities can participate in these processes is integral to the investigations, however the Rules of Procedure do not provide accessibility options to accommodate the needs of persons with disabilities, while also complying with the necessary security requirements.

Status: Ongoing

As the work began to address the barriers identified with respect to NSIRA's investigative function, it became clear that accessibility is contingent primarily on the built environment. The accessibility plan reported barriers such as heavy doors without automatic door openers. This includes the hearing room where investigative proceedings are held. Tripping hazards and restrictions with respect to assistive devices were also noted, among other concerns.

Similarly, progress around programs and services is inextricably linked to the barriers with respect to information and communication technologies. For the complaint investigation process, this included the internet website, which was not fully accessible, and limited options for persons with a hearing impairment to engage with the Registrar.

The new internet website includes a more user-friendly interface that meets WCAG standards. Complainants can more easily navigate to the information and forms they need to bring a complaint. The complaint forms themselves have been redesigned to be more accessible. Additionally, the following activities are underway:

- A new section of the Rules of Procedure is being drafted to reflect the Review Agency's commitment to ensuring accessibility. Progress is

significantly dependent on the NSIRA Secretariat's progress in incorporating accessibility requirements into the built environment.

- In addition, the amendments to the Rules of Procedure will reflect an investigation participant's ability to access alternate arrangements on a case-by-case basis to address their accessibility needs prior to their attendance on the premises for investigative proceedings.
- The Rules of Procedure will also provide that the Registrar is to be notified of barriers and/or accessibility requirements for the Review Agency to accommodate those needs.
- Finally, the Rules will provide that an individual wishing to bring a complaint must be provided procedural assistance by the Registrar in the event assistance is needed to address any barriers. This will enable access to persons with a variety of disabilities, including an individual with a cognitive disability who may require assistance articulating their complaint or allegations.

7. Transportation

The NSIRA Secretariat did not identify any barriers or develop an action plan with respect to this element.

Status: On track

Although specific actions were not identified, it is worth noting that NSIRA's offices are in Ottawa, where employees and members of the public may use various modes of transportation to reach the work sites. Accessible transportation services are provided by OC Transpo in Ottawa and by the Société de Transport de l'Outaouais in Gatineau. Individuals who use their personal vehicles may park in designated spots available at nearby lots. Information is provided to new hires about designated parking spaces.

CONSULTATIONS

The *Accessible Canada Act* requires consultations with persons with disabilities in preparing progress reports. The activities outlined in the accessibility plan for completion or launch in the first year aimed to improve accessibility for the workforce and in the workplace. This, combined with NSIRA's specific mandate, greatly influenced the focus of consultations for this first progress report.

Thanks to the introduction of a self-identification (SelfID) questionnaire, employees who identified as a person with a disability were specifically invited to provide insight into barriers in the workplace and how to resolve, remove or mitigate them. Additionally, all staff were offered an opportunity to participate in the consultation process whether they had self-identified as a person with a disability or not. In this manner the NSIRA Secretariat benefited from a range of perspectives and first-hand experiences about barriers and the actions needed to become a more inclusive and accessible organization.

FEEDBACK

Feedback from the NSIRA Secretariat's employees included suggestions to improve security scanning of assistive devices and other required technology. Suggestions were also made with respect to knowledge transfer among staff responsible for facilities (i.e., the built environment) to ensure a smooth transition and avoid potential delays for employees who await assistive or adaptive devices or equipment.

Other employees identified barriers with respect to wheelchair accessibility at one location, which had not been previously noted. Concerns also included the height of some equipment, which was out of reach for a person using a wheelchair.

Since the pandemic, meetings often include employees working on-site and from home. The feedback from employees revealed that the sound system does not pick up voices consistently from all areas of the boardrooms.

Consequently, parts of presentations or discussions in the boardroom are not being captured and employees participating from home cannot hear what is being said. It was therefore recommended that this be addressed in the context of the built environment.

No feedback was received from members of the public about the accessibility plan during the year under review.

The NSIRA Secretariat will continue to welcome feedback in the coming year.