



THE ACCESSIBLE CANADA ACT
- *A Sample Accessibility Plan*

APRIL 2023



ABOUT TRUCKING HR CANADA

As a national, non-profit organization, Trucking HR Canada advances modern HR solutions for the trucking and logistics workforce. One of our strategic priorities is to make a company's job easier by delivering a comprehensive collection of up-to-date guides, reports, templates and more to support effective human resource management, recruitment and retention efforts.

Visit truckinghr.com to find out more.

DISCLAIMER

The information contained within does not constitute legal advice. Trucking HR Canada, and all content contributors, bear no responsibility for any circumstances arising out of or related to the adoption, or decision not to adopt, any of the recommendations contained in this document.

WANT MORE?

Visit the **HR Resource Library** on Trucking HR Canada's website for up to date, practical HR management guides and tools designed specifically for trucking and logistics employers.



SECTION A

An Overview

INTRODUCTION

The *Accessible Canada Act* is a federal law that was created to find, eliminate and prevent barriers that people with disabilities face daily. Adopted in 2019, the Act's primary goal is to create a Canada that is free of barriers by 2040. To accomplish this, the Act requires that federally regulated private employers with 100+ employees prepare and publish an initial Accessibility Plan by June 1st, 2023. The date assigned to employers with 10 – 99 employees is June 1st, 2024.

The key areas of focus for employers to address in their Accessibility Plan are:

- Employment
- Built environment
- Information and communication technology (ICT)
- Communication, other than information and communication technology
- Procuring goods, services and facilities
- Designing and delivering programs and services
- Transportation

STARTING YOUR ACCESSIBILITY PLAN

Organizations are required to build their Accessibility Plan with input from persons with disabilities. This includes feedback from current employees with disabilities, and it can also include consultation with external organizations that support persons with disabilities. Through these consultations, which can take the form of surveys, focus groups, 1-1 interview etc., barriers and actions are identified and become the foundation of the Accessibility Plan.

REQUIRED HEADINGS

The Act lays out a format for organizations to follow when creating their Accessibility Plan. There are [required](#) and [recommended](#) headings.



Required headings include:

General: This section must include a process for the company to receive feedback and input on their Accessibility Plan. Identify the designated contact person's title and include the contact information for all the methods in which the company communicates with the public (e.g., email address, telephone number). It can also include an executive summary, an overview of how persons with disabilities were consulted, key findings and actions and a statement of your organization's commitment to embedding accessibility into the way you operate and develop your workplace culture.

Addressing Areas Identified in the Accessible Canada Act: This section must include each of the focus areas described in the Act (above) and detailed descriptions of the identified barriers and subsequent actions that will be taken to remove and prevent these barriers.

Consultations: In this section, organizations must describe how they went about consulting persons with disabilities prior to completing their plan. This will include information on the way they were consulted (in-person, virtual roundtables, surveys or other), who was consulted (individuals, experts and external organizations) and an overview of key feedback, data collected and a summary of comments.

While not required, additional headings may be included such as "definitions," "budget resources and allocation," "training" and areas other than those identified under the *Accessible Canada Act*.

SAMPLE ACCESSIBILITY PLAN

To assist employers, Trucking HR Canada has created a sample **Accessibility Plan (Section B)**. It is intended to serve as a guide with examples to help organizations build their own Accessibility Plan that is compliant with the requirements of the Act.

Remember that consulting with persons with disabilities is a requirement and will help a company identify the unique barriers that exist under each of the key areas of focus identified above.



SECTION B

Sample Accessibility Plan

GENERAL (REQUIRED SECTION)

Executive Summary (Recommended Subsection)

[Company Name] is committed to building a culture of inclusivity and accessibility. Not only is this part of our company culture but opening access to all is imperative to our continued growth and competitiveness as an employer in the trucking sector. We will contribute to a barrier-free Canada for everyone by building an accessibility framework that will support employees and the public we serve have the best experience possible with our services, products and facilities.

We know creating a barrier-free environment takes time and we are dedicated to the ongoing identification, removal and prevention of barriers. [Company Name] will build on our current efforts through the development of our initial Accessibility Plan as required under the *Accessible Canada Act*. This Accessibility Plan will guide our organization in meeting our accessibility commitments and in building an accessibility-confident culture.

To address gaps in these areas, it is important to recognize and understand the needs of those with disabilities. For this reason, this plan was developed in consultation with employees who identify as having a disability via employee surveys, roundtable discussions and 1-1 interviews. In addition, external organizations that serve people with disabilities were consulted in the development of this plan.

A summary of initial opportunities include:

- Improving the attraction of persons with disabilities to jobs in our company and the trucking sector.
- Expanding the range and options for accommodation, especially for drivers.
- Being better prepared to provide information in accessible formats when requested.
- Improving the knowledge of our IT team and leveraging the capabilities of accessibility features in current and future IT equipment, programs and systems.
- Initiating processes where there is a more thorough review and a “through an accessibility lens” approach to the assessment of facilities, procurement procedures, company programs, new initiatives and on-going services.



Your Input and Feedback (Recommended Subsection)

[Company Name] welcomes feedback on our Accessibility Plan from the public, employees and our stakeholders. This feedback is valuable to us as it helps us break down accessibility barriers and build on our commitment to accessibility and inclusion.

If you have an inquiry or feedback, please use one of the contact methods below. We will respond to all feedback in a timely manner. If you require support while providing feedback let us know and we will do our best to accommodate your needs.

Contact: [Position Title]

Mailing Address: [xxx]

Email: [xxx]

Telephone: [xxx]

Website: [xxx]

Statement of Commitment (Recommended Subsection)

At [Company Name] we are committed to making our organization and the services we provide accessible to all, including persons with disabilities. All Canadians have the right to benefit from our services equally and those who work with us have the right to perform their jobs free of barriers.

Reporting Our Plan (Recommended Subsection)

As required by the *Accessible Canada Act*, we will publish a status report every year that measures our progress against our commitments. We will also review and update our Accessibility Plan every three years. Progress Reports and updates to our Accessibility Plan will be shaped by consultation with persons with disabilities.



ADDRESSING AREAS IDENTIFIED IN THE *ACCESSIBLE CANADA ACT*

Below you will find examples of barriers organized into the seven subsections (key areas of focus) required by the Act. You must include each of the areas listed below in your plan. If you cannot identify barriers in one (or more) of the subsections, or if a particular subsection is not relevant to your operations, you can make note of that in the appropriate subsection (see the “Transportation” subsection in this plan for an example of this).

We also included achievable, short-term actions that could be taken in response to each of the sample barriers. You can incorporate and/or modify the sample barriers and actions to align with the outcome of your consultation process and the specifics of your company.

Employment (*Required Subsection*)

The "employment" area ensures that candidates and employees with disabilities and those who experience barriers are supported throughout the entire employment lifecycle.

Barrier #1:

Our company continues to face competition for employees and currently is not attracting enough applicants from underrepresented populations such as persons with disabilities.

Actions:

- Enhance the careers section of our website to increase visibility to Canadians with disabilities of the various jobs available in the trucking sector, highlighting our commitment to their inclusion in our workforce.
- Educate hiring managers on accessibility and how they can ensure a barrier-free hiring, selection and accommodation process.
- Benchmark current recruitment, selection and onboarding practices against leading accessibility practices in other trucking companies and different industries.

Barrier #2:

There is a need to expand our understanding of the range and variety of accommodation options available to persons with disabilities interested in becoming truck drivers.

Actions:

- Develop a framework that helps managers understand their responsibilities in the accommodation process and guides them in supporting their employees and implementing suitable workplace adjustments.



- Develop a work team consisting of managers, drivers, persons with disabilities and a disability accommodation consultant to assess and identify options for a wider range and variety of potential accommodations.
- Management and finance will determine and implement an accommodation budget to allow for assistive equipment such as lifts, steps, enhanced audio, illumination improvements etc.

Built Environment *(Required Subsection)*

The "built environment" area ensures that workspaces and the work environment are accessible for all.

Barrier #3:

Some spaces within the office and truck yard may limit the mobility of employees and visitors with disabilities.

Actions:

- Automate door openers in the Company's primary pathways.
- Rebuild 2 ramps in the truck yard that are currently too steep. This rebuild will be completed by December 2023.
- Establish a standing advisory committee of internal stakeholders to provide feedback on additional proposed design changes to the built environment and assign priority for completion.

Barrier #4:

Safety signage in our buildings and truck yard is not accessible for people with low vision.

Actions:

- Install signs with tactile and Braille text in key locations throughout buildings and the truck yards. This includes tactile walking surface indicators to warn of hazards, including the tops of stairways.
- Improve illumination of current yard signs regarding safety and direction indicators.

Information and Communication Technologies (ICT) *(Required Subsection)*

"Information and communication technologies" are various technological tools used to send, store, create, share or exchange information.

Barrier #5:

The current IT team is not well versed in accessibility technology and does not know how to assist persons with disabilities in the workplace.



Actions:

- Train IT employees to increase their accessibility knowledge and learn how to adapt services and improve interactions with persons with disabilities.
- Deliver and promote end-user training on using accessibility features on all available programs.
- Develop and promote guidance and training documents for persons with disabilities (e.g., making items larger on a screen, activating reader on MS Word, activating closed captioning on MS Teams, etc.).
- Develop accessibility guidance checklists and documents for employees that are building or procuring information technology.

Barrier #6:

Many of the tools and software used in the company have accessibility capabilities that are not being used in an accessible way.

Actions:

- Take an inventory of IT systems used by the company to measure accessibility capabilities.
- Progressively introduce new accessibility functionality to IT systems.

Barrier #7:

The inaccessibility of technologies in commonly used meeting and collaboration spaces can limit the ability of facilitators and attendees to participate meaningfully.

Actions:

- Review the technology used in common conference, learning and meeting spaces to ensure that it meets a high level of accessibility and respects all legal and policy requirements.

Communication Other Than ICT (Required Subsection)

This area requires that organizations provide barrier free access for the public, clients and employees to all the communications that the Company produces for this audience.

Barrier #8:

The Company does not have a consistent process to ensure alternate formats of communication that it issues to employees and other stakeholders are available and provided in a timely manner.

Actions:

- Identify service providers and develop contracts or agreements to create alternate formats, where appropriate and when needed.



- Prepare standard resources and commonly issued company communication in alternative formats so that they are ready to be distributed upon request.
- When asked, we commit to providing these alternate formats as soon as possible and within time frames listed in the *Accessible Canada Regulations*:
 - print
 - large print
 - braille
 - audio format
 - an electronic format that’s compatible with adaptive technology meant to help people with disabilities.

Procurement of Goods, Services and Facilities (*Required Subsection*)

The “procuring (buying) goods, services and facilities” area ensures that accessibility is considered at the beginning of the buying process.

Barrier #9:

[*Company Name*]'s procurement procedures and practices do not take into consideration accessibility requirements.

Actions:

- Update the procurement procedures to include accessibility checks when buying goods and services.
- Include accessibility considerations into procurement templates (e.g., requests for proposals) so that they inform the selection of external vendors, products and services and confirms that they will abide by the requirements of the *Accessible Canada Act*.

Design and Delivery of Programs and Services (*Required Subsection*)

When designing and delivering the Company’s internal and external programs and services, accessibility considerations must be part of the process right from the very start.

Barrier #10:

Currently there is no standard approach for ensuring all programs, processes and services have taken accessibility into account.



Actions:

- Leverage the mandatory requirement to consult with persons with disabilities by creating a forum consisting of employees from various departments including drivers, mechanics, yard workers, IT, HR, finance, security etc.) to review and provide feedback on all programs, processes, policies and services. This forum will review current programs and services and then will provide input prior to the development of future programs and services.
- Develop and promote guidelines on how to apply the accessibility lens when reviewing company policies, programs and services.
- Create an Accessibility Checklist to help ensure key accessibility considerations are considered.
- Provide training on the *Accessible Canada Act* and *Accessible Canada Regulations* for those whose role is to develop programs, processes and procedures.

Transportation (Required Subsection)

This area of focus in the *Accessible Canada Act* covers the transport of people and goods. Vehicles that are used by organizations and regulated by the federal government must take into consideration barriers to operation and provide accommodation to the employee operating the vehicles as needed.

Barrier #11:

[*Company Name*] is currently limited in the options that it provides for employees that experience challenges and concerns with driving during dawn, dusk, or nighttime driving.

Actions:

- Identify and implement “winter schedules” that will shift and/or shorten driving hours to align with dawn and dusk hours.
- For long haul trucking, implement a two-driver arrangement so that nighttime driving can be done by the second driver.

Barrier #12:

Entering a transport truck and other warehouse vehicles often poses a problem for drivers over time due to the repetition and height of the steps. For people with motor related disabilities, requiring them to get into a cab can prohibit them for doing their job.

Actions:

- Budget for and carry a small inventory of extended tractor steps and/or folding steps which can reduce the climbing distance to get into the truck cabs or warehouse vehicles.
- Where applicable, install a swivel seat to improve access to the truck cabs or warehouse vehicles.



CONSULTATIONS (REQUIRED SECTION)

To align with [Company Name]’s commitment to make our workplace environment accessible to all, we have developed our Accessibility Plan in consultation with our employees, including those with disabilities.

We gathered feedback and input from our team members and external organizations in several ways:

- Companywide survey.
- Focus groups and 1-1 interviews with employees with disabilities so they can share their ideas.
- Engaging with external organizations supporting persons with disabilities to understand and seek recommendations for improving accessibility to the Company’s building space and yards and our programs and services. Organizations we consulted include:
 - Alliance for Equality of Blind Canadians
 - Canadian Association of the Deaf
 - ABC Disability Consulting Group
 - Health Canada, Network for persons with disabilities

We will continue to survey employees, including those with disabilities and any working groups that have been developed as part of this Accessibility Plan, to measure progress and ensure that we realize the changes we’ve set out to achieve.

DEFINITIONS (RECOMMENDED SECTION)

Accessibility:

Refers to the needs of persons with disabilities being intentionally and thoughtfully considered when products, services and facilities are built or modified so they can be used and enjoyed by all.

Barrier:

The *Accessible Canada Act* defines a barrier as “anything—including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice—that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.”

Disability:

The *Accessible Canada Act* defines a disability as “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, interaction with a barrier, hinders a person’s full and equal participation in society.”



SECTION C

Resources

For more information and guidance on the *Accessible Canada Act* and creating an Accessibility Plan:

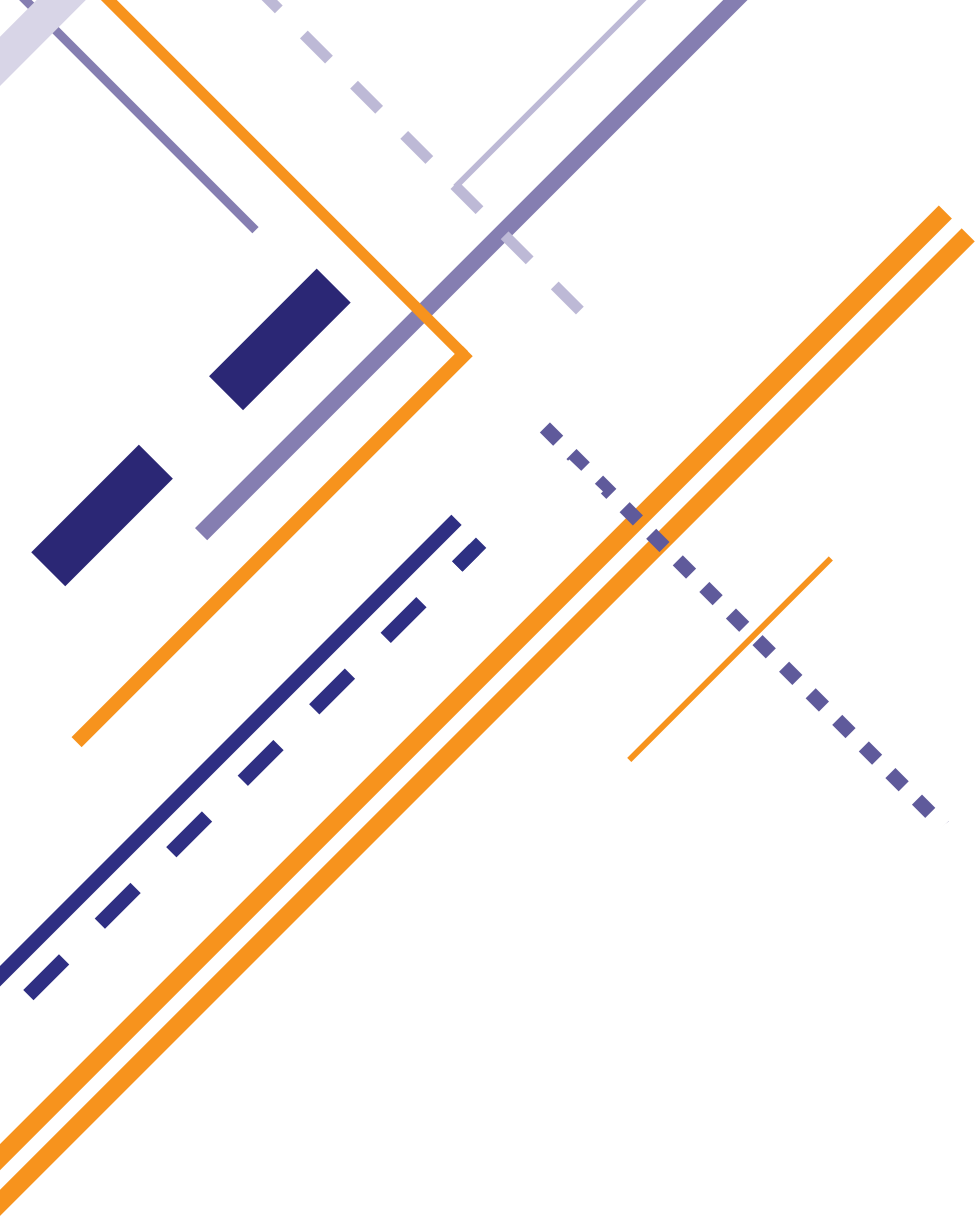
Employment and Social Development Canada: Summary of the *Accessible Canada Act*
<https://www.canada.ca/en/employment-social-development/programs/accessible-people-disabilities/act-summary.html>

Employment and Social Development Canada: Summary of the Accessible Canada Regulations
<https://www.canada.ca/en/employment-social-development/programs/accessible-canada/regulations-summary-act.html>

Employment and Social Development Canada: Sample Accessibility Plan Template
https://www.canada.ca/content/dam/esdc-edsc/documents/programs/accessible-canada/accessible-canada-regulations-guidance/GuidanceOnACR-Template_ENG.pdf

Employment and Social Development Canada: Guidance on Accessibility Plans
<https://www.canada.ca/en/employment-social-development/programs/accessible-canada-regulations-guidance/accessibility-plans.html>





PREPARED BY:



104-720 Belfast Road
Ottawa ON K1G 0Z5