



THE ACCESSIBLE CANADA ACT
- *A Sample Progress Report*

OCTOBER 2024





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.



INTRODUCTION

The Accessible Canada Act (ACA) was established to ensure a barrier-free Canada by 2040.

As a federally regulated private employer in the trucking and logistics sector, you are required under the ACA to develop and publish an accessibility plan that identifies, removes, and prevents barriers that persons with disabilities may encounter when they interact with your business.

Trucking HR Canada (THRC) has developed a template to help federally regulated industry fleets develop their Accessibility Plan. Access *The Accessible Canada Act – A Sample Accessibility Plan* in the THRC Resource Library.

Depending on the size of your company, the timelines for publishing your accessibility plan will differ. However, regardless of when your initial accessibility plan was due, a progress report must be published on the 1st and 2nd year anniversary of the due date of your initial accessibility plan

Progress reports are intended to ensure businesses remain focused and committed to taking positive, meaningful actions as laid out in their accessibility plan.

At a minimum, for each progress report companies must:

- Notify the Accessibility Commissioner when a progress report is published.
- Consult persons with disabilities when preparing progress reports.
- Provide information about how they consulted persons with disabilities and the feedback received through their feedback process.
- Describe how they considered that feedback.
- Make copies of their progress reports available in certain formats upon request.

This guide has been developed by THRC to help fleet employers understand their obligations when documenting and publishing their progress reports.



In this guide you will find:

- What to consider when preparing your progress report.
- The mandatory sections to include for compliant reports.
- A sample progress report.
- Answers to frequently asked questions (FAQs).

GETTING STARTED

As with most projects, a little planning and preparation can make for an easier process when it comes time to document your progress.

Follow these key steps to help create a robust and informative report:

Step 1 – Assign a Lead: Begin by assigning responsible individuals to lead and coordinate the process. Ideally, these individuals helped draft your initial accessibility plan, so they are already familiar with its goals and how they align with your organization's operations. They should also have a clear understanding of the role feedback and consultation with persons with disabilities plays in developing your progress report. Regardless of who is selected, ensure they understand your organization well and can communicate with decision-makers.

Step 2 – Gather Information: Begin by getting a clear picture of what's been accomplished since publishing your first accessibility plan. Establishing clear goals, actions, and timelines in your initial plan will make tracking and measuring progress in your progress report a lot easier. Choose a tracking approach that works best for your company based on your operations and resources.

Step 3 – Consult: Much like you consulted persons with disabilities when preparing your accessibility plan, you will continue to consult when writing your progress reports. Consultations can occur at various stages, but it's advisable to do so well before publishing the progress report. This allows for meaningful input and accommodates those who may need extra time for review and feedback. There's no specific method mandated for these consultations; consider the specific needs and objectives of your organization. If possible, involve those consulted for your initial accessibility plan in your progress report consultations: their insights can enhance implementation and demonstrate a commitment to ongoing change.

Step 4 – Document: The Accessible Canada Regulations require progress reports to be written in language that is simple, clear, and concise. Use short sentences and avoid technical words. Someone who knows nothing about your company or its work should be able to understand the plan's contents.



REQUIRED HEADINGS

According to the Accessible Canada regulations, there are four mandatory headings that must be included in your progress report. The regulations also lay out the types of information you must include under each heading.

1. General

You must include:

- The title of the person designated to receive feedback.
- Contact information for your organization, including:
 - mailing address
 - telephone number
 - email address
 - information for any other communication methods used by your organization (e.g., social media or website)

You must also provide ways for people to:

- Request accessibility plans, progress reports, and feedback process descriptions in alternate formats.
- Submit feedback about barriers they have encountered.
- Submit feedback on your organization's implementation of its accessibility plan.

2. Priority Areas in Section 5 of the ACA

In this section you must describe the progress made in relation to barriers and related actions identified in your accessibility plan. Under each of the seven priority areas, you should comment on the steps your company has taken to date to implement your accessibility plan, identify actions that have been achieved, and possibly even challenges that still need to be addressed.

As a reminder, the seven priority areas are:

- Employment.
- The built environment (buildings and public spaces).
- Information and communication technologies.



- Communication (other than information and communication technologies).
- Procurement of goods, services, and facilities.
- Design and delivery of programs and services.
- Transportation (airlines, as well as rail, road, and marine transportation providers that cross provincial or international borders).

3. Consultations

As is the case when establishing your accessibility plan, the ACA requires organizations to consult persons with disabilities when preparing their progress reports. Describe the approach taken in your consultation process under Consultations.

The following questions will help organize the information you include in this section.

- When did the consultations take place?
- How did the consultations take place?
- Who did you consult with?
- What were the topics or focus areas of the consultations?
- What input and suggestions did you receive?

4. Feedback

While the above mandatory headings are very similar to the requirements of the accessibility plan, note that the progress report also requires a Feedback section. Use this section to list any feedback your company has received that relates to accessibility, for example, the need for on-site ramps and handrails, screen reader functionality, accessible washroom facilities, job application processes that meet the needs of people with disabilities, and more.

Under this heading, you must provide information about:

- Feedback that has been received about how your organization is implementing its accessibility plan and any barriers persons who interact with your company have encountered.
- How your organization has taken this feedback into consideration.

NOTE: While the headings identified above are mandatory minimum requirements, organizations can also include sections such as Executive Summary, Training, Definitions, and Conclusions/Summary.



THRC has develop a guide that includes a template to help federally regulated industry fleets develop their Feedback Process for receiving and responding to feedback related to your accessibility plan and progress report and/or any barriers that are encountered by others when interacting with your company. Access *A Guide to Developing Your Feedback Process and Sample Template* in THRC's HR Resource Library.



SAMPLE PROGRESS REPORT

We prepared a sample progress report to help provide clarity and ideas on what a progress report could look like. Each organization will build their reports based on the barriers that exist in their own unique environments, the goals laid out in their accessibility plan, and the input received through the feedback and consultation process.

1. General

We have designated our [position title] to manage inquiries on behalf of [company name] about our accessibility plans, progress reports, and feedback process.

We welcome feedback related to our accessibility plan and progress reports from our employees, customers and members of the public. We are committed to reviewing the feedback we receive and taking meaningful steps to address barriers that are encountered when individuals interact with our business.

You can send feedback anonymously or you can include your name and contact information.

You can provide feedback in the following ways:

- Send an email to: [*email address*]
- Call by phone at: [*phone #*] or TTY at [*phone #*]
- Mail us at: [*company address*]
- [*insert information for any additional means your company has for receiving information from the public e.g. web forms*]

We will confirm that we have received your feedback.

When requested, we will provide a copy of our accessibility plan, progress reports, or description of our feedback process in one of these alternate formats:

- Print
- Large print
- Braille
- Audio format

For print and large print, we will send you the document within 15 days. For Braille and audio formats, we will send them to you within 45 days.



2. The Areas of Our Accessibility Plan

Employment

We want to create a workplace that includes and supports every employee. To accomplish this, we will increase the attraction of employees from underrepresented populations and expand the options for accommodation of persons with disabilities in an environment where options have been traditionally limited.

Progress:

- We have enhanced the career section of our company website to increase the visibility of the range of jobs available in the trucking sector for persons with disabilities.
- A training session was held for all hiring managers to ensure they are equipped with the knowledge and skills required to ensure we have a barrier-free hiring, selection, and accommodation process. All new managers will receive this training as they are hired/promoted.
- We are in the process of coordinating 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. We plan to have this action completed within six months of publishing this report.

The Built Environment

Maintaining the accessibility of our built environment remains a top priority. We continually work to identify and remove barriers that exist within our office and truck yard.

Progress:

- We have automated four of the six doors located on the primary pathways.
- Two ramps in the truck yard have been rebuilt with an appropriate incline.
- An additional ramp has been identified as too steep and contractors are secured and scheduled for a rebuild in the next month.

Information and Communication Technologies (ICT)

We strive to ensure that everyone can access the same information and receive the same services using information technology. To do this, our focus has been on training and providing training documentation to members of our workforce.



Progress:

- The IT team has been provided with training required to assist persons with disabilities, including a deeper exploration into identifying barriers and accessibility in relation to information technology. The team was specifically trained on ways to adapt services and improve interactions with persons with disabilities. Training is ongoing and included in their Individual Development Plans.
- Training and training documents have been made available to end-users that wish to use accessibility features on the technology we currently use within the organization.

Communication, other than ICT

To reach our employees and the public effectively and fairly, we continue to look for ways to make our communications more accessible to all. As such, we have engaged in a process that will ensure we have alternate forms of communication available and provided in a timely manner when requested.

Progress:

- We have identified and contracted two vendors to create alternate formats on behalf of our company when required. There are service-level requirements built into the contract to ensure we comply with regulations specifying timelines for providing the alternate formats.
- One of the service providers contracted has already prepared alternate formats for standard company communication.

Procurement of Goods, Services and Facilities

We have implemented new procedures and procurement policies to ensure accessibility is embedded in every aspect of the procurement process.

Progress:

- We established a cross-departmental team to review all current procurement processes and updated to include accessibility checks. Three persons with disabilities were part of this review team.
- We are currently working on updating procurement templates to ensure they include accessibility considerations.

Design and Delivery of Programs and Services

Through feedback collected over the year, both through employee surveys, and the consultation and feedback process, we have focused on building tools and guidelines for ensuring that every program or service that we design or deliver has been done through an accessibility lens.

Progress:

- A consultant was brought in to train everyone who develops programs, processes, and procedures on the Accessible Canada Act and the Accessible Regulations.



- A cross-departmental team has been established to review current design and delivery of programs and services in the company. The team met to establish project goals, criteria, and guidelines for accessing the programs. The actual review of current programs will begin in one month with a target completion date within six months. Recommendations will be documented and shared with program owners to implement recommended and approved actions.

Transportation

As part of the transportation and logistics industry we are committed to meeting accessibility requirements when using our vehicles to transport goods.

Progress:

- For those who experience difficulty driving at dusk and/or nighttime, we developed a policy making winter schedules available to those who experience these challenges.
- We purchased five extended tractor steps for those who require easier and/or supported access to their trucks.
- Given the significance of the driver occupation, we identified an opportunity to conduct a survey specifically for truck drivers, including those with disabilities, to obtain feedback on the barriers they encounter when transporting goods.

3. Consultation

The Accessible Canada Act requires that organization consult persons with disabilities in preparing its progress reports. We approach this as an important and valuable process based on “nothing about us, without us”.

What we consulted on: As part of the consultation process, we asked participants to provide input on their experiences when interacting with our company. This included providing feedback on the types of interactions they had and any barriers they encountered. Part of the inquiry included requesting their ideas and suggestions for improvement.

When we consulted: To ensure continuous feedback, we conducted two consultation engagements over this past year – October 2023 and April 2024.

Who was consulted: We invited feedback from our employees with disabilities, individuals from outside our company with disabilities, two associations that support persons with disabilities and one disability consultant.

How we consulted: We took steps to ensure that the consultations were inclusive and accessible. We invited our employees with disabilities to provide feedback on our first progress report via written email or virtual or in-person 1:1 meetings if requested.

Questions we asked them to consider when providing feedback were:

- What are your thoughts on the progress report in general?
- What are your thoughts on the progress our company has made in the last year?



- What are your thoughts on the consultations you've been part of so far? What went well? What could be improved?
- Do you have anything else to add about the progress report?

We also met with representatives from two external organizations that support persons with disabilities to review and provide feedback on our progress report. Also important was gaining their insights into progress made within the industry and sharing of additional ideas and best practices utilized in other organizations.

Finally, we have engaged a disability consultant. They participated in the development of our accessibility plan and progress report and gave us ways to identify and remove barriers within our business.

What we learned from our consultations: This process provided us with valuable insights into issues that are of importance to persons with disabilities, including:

- Fostering accessibility and inclusion in the hybrid and remote work environment.
- Understanding best practices for accessible meetings and events and finding more ways to integrate them into our approach.
- Creating accessible documents and providing ongoing training for all employees.
- Raising awareness about accessibility, especially regarding non-visible disabilities, and promoting our accessibility efforts.
- Continuing discussions about career growth with employees with disabilities and finding ways to support their development and career advancement.
- Using technology, tools, and website updates to improve accessibility.
- Setting an example as a leader and demonstrating how to be and operate in an accessible and inclusive organization.

Feedback

In the past year, we received the following comments via our feedback process:

- The automatic door was not functioning properly and had to wait to be let into the building.
- I requested a large print version of your brochure and it took weeks to get to me.
- [*insert comments/ statements received through your feedback process*]
- [*insert comments/ statements received through your feedback process*]
- [*insert comments/ statements received through your feedback process*]

All feedback received has been tracked and considered as we identify future actions for improving accessibility at [*company name*].



FREQUENTLY ASKED QUESTIONS

What do they mean when they say an organization must “publish” their progress reports?

You must publish your progress report on the primary digital platform you own, operate, or control. This platform should be the main one you use to communicate with the public (usually your organization’s website or digital portal). The report should be easily accessible, either directly on the homepage or through a highly visible link from the homepage.

If you don’t have a digital platform, you still need to publish progress reports by displaying printed copies in the reception area or entrances of each of your locations. These copies must be clearly visible and accessible to the public.

Note that if you publish your progress reports online, they must meet the requirements for Level AA compliance in the most recent Web Content Accessibility Guidelines (WCAG) officially available in French and English.

When must we publish our progress reports?

Organizations must publish progress reports by the anniversary of the deadline for publishing their most recent accessibility plan.

Different types and sizes of organizations have different deadlines:

- Private sector organizations with an average of 100 or more employees
 - publish first accessibility plan by **June 1, 2023**
 - publish first progress report by **June 1, 2024**
- Private sector organizations with an average of between 10 and 99 employees
 - publish first accessibility plan by **June 1, 2024**
 - publish first progress report by **June 1, 2025**

Once we have published our progress report, is there anything else we are required to do?

Yes, similar to your accessibility plan, you must notify the Accessibility Commissioner via the [My Accessibility Portal](#) or by email at Info.Com@chrc-ccdp.gc.ca within 48 hours of publishing a progress report.



You must send this notification by email or other electronic means and the notice must include either:

- The URL of the progress report
- A link to the progress report, or
- The mailing addresses of the places of business where you are displaying a print copy of the progress report

Is there any requirement specifying how long your progress reports must be?

The regulations do not say how long your progress reports must be. What is important is that the reports show your progress in implementing your accessibility plan.

What are our obligations in terms of providing our progress reports in accessible formats?

You must make progress reports available in the following formats when requested:

- Print
- Large print
- Braille
- Audio format
- An electric format compatible with adaptive technology intended to assist persons with disabilities

How soon do we have to provide the accessible format once the request has been made?

According to the ACA Regulations the following deadlines apply:

- For print, large print, and electronic formats:
 - private sector organizations with an average of 100 or more employees: within 15 days of a request
 - private sector organizations with an average of 99 or fewer employees: within 20 days of a request



- For Braille or audio formats:
 - all organizations: within 45 days of a request

How long must we retain our progress reports?

Once you publish a progress report, you must retain a copy of it that is accessible to the public.

How and where you retain this copy will depend on how and where you published the progress report:

- If it was published on your main digital platform, retain a digital copy on that platform
- If it was displayed in the reception or entrance area of your place(s) of business, retain a print or electronic copy at each place

You must retain a copy of each progress report for at least seven years from the day by which you had to publish it. This applies equally to digital, print, and electronic copies.

What is the legislated planning and reporting cycle that our organization needs to follow?

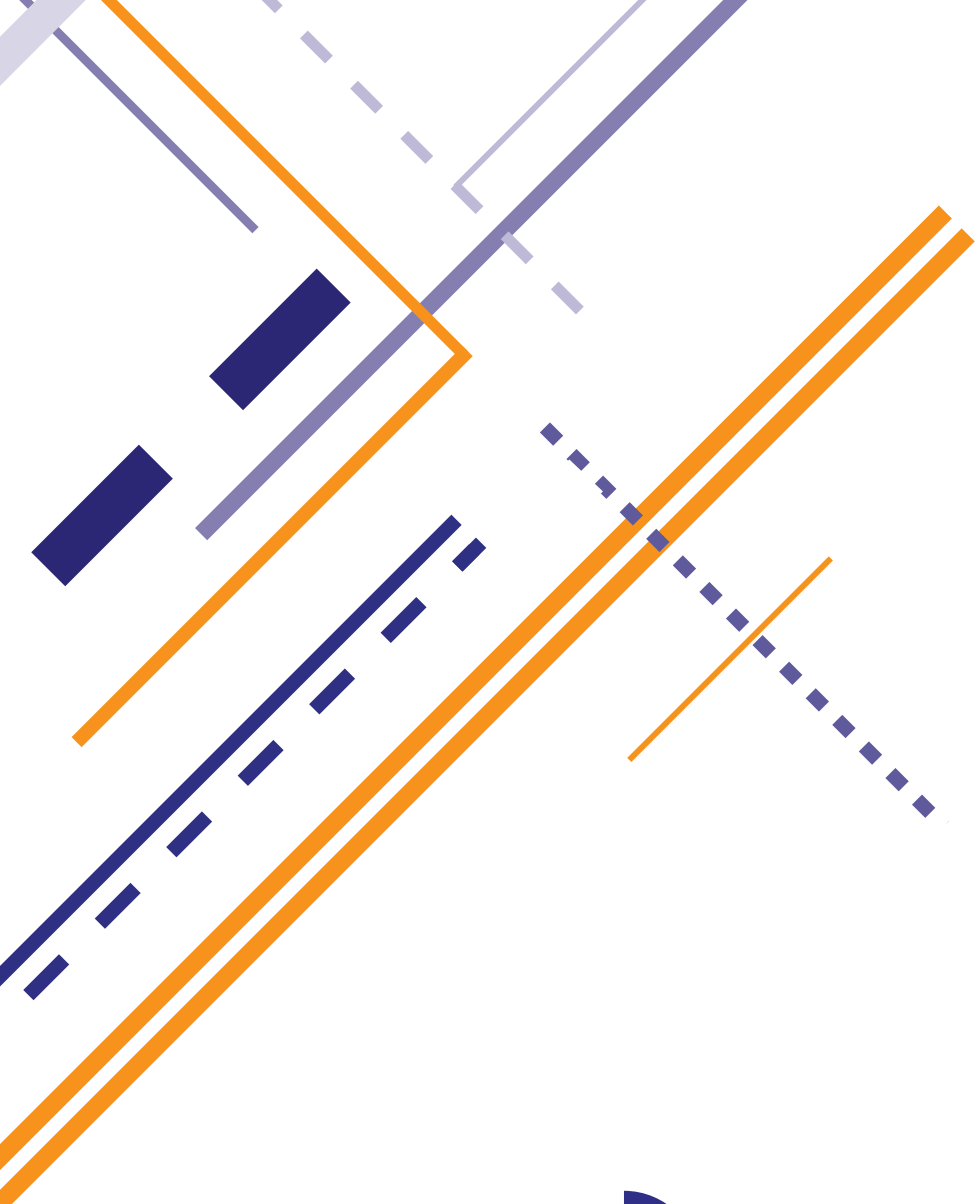
The regulations set the following planning and reporting cycle for federally regulated organizations:

- **Year 1:** publish an accessibility plan and a feedback process description
- **Year 2:** publish a progress report on the implementation of the accessibility plan
- **Year 3:** publish a second progress report
- **Year 4:** publish an updated accessibility plan
- **Year 5:** publish a progress report on the implementation of the updated accessibility plan; continue the cycle as before

Where can I find more information related to progress reports?

The Federal Government has provided a number of resources and guidelines to help organizations in the development of their progress reports on:

<https://www.canada.ca/en/employment-social-development/programs/accessible-canada-regulations-guidance/progress-reports/introduction.html>



© Trucking HR Canada 2024. All rights reserved.

All rights reserved. The use of any part of this publication, whether it is reproduced, stored in a retrieval system, or transmitted in any form or by any means (including electronic, mechanical, photographic, photocopying or recording), without the prior written permission of the Trucking Human Resources Canada, is an infringement of copyright law.

truckinghr.com