



Immigration and Refugee Board of Canada IRB Accessibility Plan 2023 to 2025

Aussi disponible en français sous le titre : Plan d'accessibilité de la CISR 2023 à 2025

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1. General

1.1 Description of the IRB

The Immigration and Refugee Board of Canada is Canada's largest independent administrative tribunal. It is responsible for making well-reasoned decisions on immigration and refugee matters efficiently, fairly and in accordance with the law. Our work provides access to justice to tens of thousands of people each year. Our work also contributes to the integrity of Canada's immigration and refugee systems.

As an independent administrative tribunal, the IRB is known for both (i) individual decision-maker (adjudicative) independence and (ii) a degree of institutional independence. The IRB reports to Parliament through the Minister of Immigration, Refugees and Citizenship.

Our work is done in four separate tribunals, known as "divisions":

- 1. The Refugee Protection Division decides whether people who have claimed refugee protection in Canada can get that protection.
- 2. The Refugee Appeal Division decides appeals from decisions of the Refugee Protection Division.
- The Immigration Division makes decisions about whether certain people who are not Canadian are allowed into Canada, or could be removed from Canada, under the law. This division also reviews decisions made by the Canada Border Services Agency (CBSA) to detain someone.
- 4. The Immigration Appeal Division decides appeals on immigration-related matters including family sponsorships refused by Immigration, Refugees and Citizenship Canada and removal orders issued by the Immigration Division or the Canada Border Services Agency. It also decides appeals from Immigration, Refugees, Citizenship Canada relating to the removal of a person's permanent resident status based on whether they have spent enough days in Canada, under the law.

1.2 Statement of commitment

The Accessible Canada Act (ACA) is a law to make Canada barrier-free by 2040. This is the IRB's first 3-year plan to achieve that goal.

It is important that the IRB, as an administrative tribunal, is fully accessible to, and removes barrier for, people with disabilities appearing before it. Barriers to accessibility can affect how people can participate in IRB hearings. In some cases, barriers can affect, or be seen to affect, the fairness of a hearing. The IRB is committed to access to justice for everyone, which includes accessibility for people with disabilities, both across the IRB and those appearing before it.

Accessibility is on-going work. It is a continuous process. It is the responsibility of everyone at the IRB. And it is the right thing to do.

Through this commitment, the IRB can ensure that everyone is treated fairly and is able to interact with the IRB with dignity. It will help ensure that everyone has access to our processes. By being more accessible we will be able to better meet the needs of people appearing before the IRB, including people who may be coming from traumatic experiences or have disabilities.

People with disabilities make important contributions to the IRB. By working to remove barriers and becoming more accessible, the IRB will become a workplace that will look more like the people of Canada.

1.3 Easy read version of this plan

An easy read summary is a simple and shorter version of the IRB's Accessibility Plan. It does not include all of the details of the full plan. For the full plan, please skip to the section called IRB's Accessibility Plan.

This Accessibility Plan talks about the things we will do in the next 3 years to become more accessible. We made this plan by:

- Talking to staff about barriers to accessibility
- Consulting with a group of people with disabilities who work at the IRB
- Sending out surveys to employees
- Consulting with a group of people with disabilities who don't work at the IRB
- · Consulting with a group of people and organizations that work with refugees and immigrants
- · Listing accessibility barriers we found
- Finding ways to remove those barriers or reduce their impact as much as possible

We then decided on things we would do to be more accessible. Over the next 3 years, we will:

- Make sure that training is available on disability sensitivity, accessibility, and plain language.
- Add new jobs within the organization focused on increasing accessibility at the IRB. This includes in areas like human resources, information technology, and digital communications.
- Write a guide on the accessibility of training. This will help us when buying or making training in the
 future. We will also review our current training and create a plan for any training that doesn't meet the
 criteria in this guide.
- Start using the Government of Canada Workplace Accessibility Passport. This makes it easier for employees to keep their accommodations when they change jobs.
- Train staff to review job postings for barriers. Those staff will then review future job postings.
- Review our employment practices to find barriers.
- Review our accommodation process and policy for employees and job candidates. We will look for ways to make the process smoother.
- Develop a strategy for hiring more people with disabilities.
- Work with accessibility advisors to plan improvements to the buildings we work in. We'll make sure
 that we consider accessibility in future decisions about our office space.
- Complete the renovations that are planned of our offices at 344 Slater, Ottawa that include new accessibility standards.
- Make sure there are quiet workspace options at our offices.
- Partner with the Accessibility, Accommodation and Adaptive Computer Technology (or AAACT for short) program at Shared Services Canada to get resources on accessible technology for employees.
- Train staff on how to make accessible documents and write in plain language.
- Create videos explaining the refugee claim process in plain language.
- Make sure our website meets the government of Canada accessibility standards. Write more website
 content in plain language where possible. Improve the accessibility of forms on our website.
- Do user testing to make sure that our forms and public website content work well.

- Look at how we meet the needs of deaf people and other people who use sign language.
- Make sure that we are thinking about accessibility when we are buying the things that we need.

1.4 Contact information and feedback process

We welcome feedback about this Accessibility Plan and IRB accessibility from employees, people appearing before the IRB, or members of the public. We are committed to reviewing the feedback that we receive and taking steps to address barriers.

To submit your feedback see <u>Providing feedback on accessibility to the Immigration and Refugee Board of Canada</u>.

We will also accept feedback about our accessibility plan and the accessibility of our services through direct messages on our various social media accounts.

We collect feedback and monitor the progress of this plan. Any feedback that we receive about our accessibility plan will be kept for 7 years. We will use this feedback to help monitor our progress and to help identify other barriers to accessibility.

You can request alternative formats of this Accessibility Plan, and a description of our feedback process, by contacting (Name, and contact info of the person responsible, especially if different from above).

We will provide alternative formats as soon as possible. We commit to providing formats within these timelines:

- Print: 15 days
- Large print (larger text): 15 days
- Braille (a system of raised dots that people who are blind or with low vision can read with their fingers): 45 days
- Audio (a recording of someone reading the text out loud): 45 days

1.5 Definitions

This plan uses the following definitions, which are based on the ACA definitions:

- **Disability:** An impairment, or difference in physical, mental, intellectual, cognitive, learning, or communication ability. Disabilities can be permanent, temporary, or can change over time.
- Barrier: Anything that might prevent people with disabilities from having a full and equal participation
 opportunity to participate in society. Barriers can be based in attitudes, the built environment,
 technology, in how information is communicated, or can be the result of a policy or procedure.
- Accessibility: The design of products, devices, services, environments, technologies, policies, and practices in a way that allows all people, including people with a variety of disabilities, to access and use them, as independently as the person wishes.

2. The IRB's Accessibility Plan

Each of the following sections includes an overview of that pillar and a list of the IRB's actions to improve accessibility in 2023-2025. Our actions are organized by ACA key pillar area:

- Organization-wide initiatives: These are actions that will affect all areas of the ACA and the IRB.
- Employment
- Built environment
- Information and communication technologies (ICT)
- Communication, other than ICT
- Procurement
- · Design and delivery of programs and services
- Transportation

2.1 Organization-wide initiatives

Overview

To the best of our ability, the IRB responds to accessibility needs as they arise and proactively puts best practices into place. We do this with an eye towards accessibility as an issue that affects people's rights. We strive to be knowledgeable about accessibility best practices and standards. We also aim to make things more accessible from the beginning. A particular barrier we have is with the decentralized nature of our organization. This plan sets IRB up for success because it ensures that policies, training, employment practices and culture changes are suitable for the sites and offices where we operate.

- 1. By early 2023, our senior leadership will communicate to all staff a commitment to accessibility at the IRB.
- 2. By fall 2023, we will add several new positions focused on accessibility. These will include a plain language writer, an accommodations accessibility coordinator on the human resources team, and an accessibility coordinator on the information management and information technology team.
- 3. In 2023, our communications team will develop an internal communications strategy to support a culture change within our organization.
- 4. In 2023, we will define and document the roles and responsibilities that contribute to and advance accessibility within the IRB. This will include defining the roles of the Employees with Disabilities Network, accessibility coordinators, the persons with disabilities champion, and diversity and inclusion teams.
- 5. In 2023, we will develop a strategy that explains how we will conduct consultations with people with disabilities, both inside and outside the organization. We will make sure this strategy considers intersectional perspectives and experiences.
- 6. In 2023, we will make sure that staff and managers who are involved in the accommodation process are provided training about the importance of accommodation and the legal duty to accommodate employees (if they have not already received that training).
- 7. In 2023, we will develop an accessibility standard to clarify for staff when and how accessibility should be prioritized and arranged. Examples include proactive call-outs for accessibility needs

- as part of invitations, and committing to having accessible documents available within specific timeframes.
- 8. In 2023, we will create or identify accessibility awareness and disability sensitivity training for IRB staff
- In 2024 and ongoing, IRB staff will receive disability sensitivity and accessibility awareness training (if they have not previously received that training). In 2023-24, we will create or identify accessibility awareness and disability sensitivity training
- 10. In 2024, we will review our existing strategy for how we engage and consult with people with disabilities, including the role and responsibilities of the persons with disabilities champion, our Employees with Disabilities Network and the Chairperson's Advisory Committee on Diversity and Inclusion. The review will assess what changes are required to build on recent efforts to further strengthen how we engage and consult persons with disabilities and how we can best implement current and ongoing accessibility commitments.

2.2 Employment

Overview

We are committed to diversity amongst the 2,300 employees working at the IRB across Canada. We also have approximately 475 decision-makers, called members. We have targets to hire more people with disabilities and have taken numerous steps to do so. For example, we use programs to hire more people with disabilities, such as the Federal Internship Program for Canadians with Disabilities. We also use a Diverse Selection Board Inventory, which enables us to have people with disabilities on hiring panels. Managers are invited to complete an accessibility-related course through the Canada School of Public Service.

Despite our efforts, the number of employees with disabilities at IRB is lower than we want it to be. Key areas for improvement exist in our hiring, training, and accommodation processes.

- 1. In 2023, we will develop an internal standard or guideline on the accessibility of training that we will either create or purchase. This will include
 - defining the accessibility requirements of training material and the delivery of in-person or virtual training
 - the responsibility and process for training accessibility
 - what training the standard or guideline applies to, and any exceptions
- 2. In 2023, we will partner with the Office of Public Service Accessibility (OPSA), to leverage the Government of Canada Workplace Accessibility Passport. The Passport will document possible solutions, devices or supports an employee has received in the past. It will also list the adaptive tools that the employee would like to bring with them from one position within the public service to another.
- 3. In 2024, we will complete a review of our accommodation process and policy for employees and candidates with disabilities. This review will be completed in consultation with employees with disabilities. In this review, we will look for barriers and challenges in the accommodation process for both employees and candidates with disabilities. We will also look for ways to simplify the accommodation process.
- 4. In 2024 we will implement changes to our accommodation policy based on the results of our review. Our goals for these changes will be to:

- make the process as easy as possible for employees
- shorten wait times for receiving accommodations
- increase the number of accommodation requests that get approved and implemented in a timely manner
- reduce the number of requests for medical documentation and broaden the types of clarification that can be accepted
- 5. In 2023, we will make improvements to the language utilized in our job postings offering accommodations.
- 6. Starting in 2024 and ongoing, we will review the text of future job postings to consider the impact of them on potential candidates with a variety of disabilities. We will ensure that any employees tasked with reviewing the accessibility of job postings have received training on how to do such a review.
- 7. In 2023 we will complete an employment systems review, including specific consideration of candidates with disabilities.
- 8. Starting in 2024, we will increase the skills of IRB training developers so that they can develop training that meets the IRB's guideline on training accessibility
- 9. From 2025 onwards we are committing to developing or buying training that meets the IRB's guideline on training accessibility. We will rely on the Canada School of Public Service (CSPS) to assess the accessibility of the training that the CSPS provides.
- 10. By the end of 2024, we will develop a strategy for hiring more people with disabilities. The IRB's staffing team will make every effort to have a person with a disability take ownership of the recruitment strategy for persons with disabilities.
- 11. By the end of 2024, we will make a plan to remove barriers or update training material as appropriate. By the end of 2025, we will conduct a review of our current training materials to find out which training materials do not meet the IRB's internal standard or guideline on accessible training.

2.3 Built environment

Overview

The IRB has a head office located in Ottawa. We have regional offices in Vancouver, Calgary, Toronto, Etobicoke, and Montreal. We also operate in other physical spaces, such as detention facilities. There are accessibility barriers in some of the IRB's office environments. Barriers include a lack of automated doors, doorways that are too narrow for wheelchairs, small meeting rooms with fixed furniture, small elevators, small chairs, and no Braille or tactile signage.

There are some limitations on our ability to address barriers in our built work environments.

The accessibility of these facilities is not always within our control. Some of these spaces are the responsibility of the Canada Border Services Agency (CBSA), the part of the government that is responsible for the flow of travellers and goods in and out of Canada.

Another limitation on what we can do to make sure our sites are fully accessible is the fact that many of our buildings are looked after by Public Services and Procurement Canada (PSPC). PSPC is the federal agency that purchases and manages properties for many parts of the government.

We are currently hiring consultants from PSPC to help identify built environment barriers that we are in control of and can change internally. A good model of a fully accessible location is the new home for IRB's Toronto office at 25-55 St Clair Avenue East, which we hope to occupy in late 2023. We also commit to the following actions:

Actions to improve accessibility

- 1. We will continue to work with accessibility advisors to identify and plan improvements to our built environment.
- 2. Accessibility will be a core consideration in all future office space decisions and plans, alongside operational considerations.
- 3. Starting in 2023, we will start the planned renovation to update our offices at 344 Slater, Ottawa, including applying new accessibility standards. This refit will be complete by March 2026.
- 4. By the end of 2024, we will identify quiet workspace options at all office locations. We will let employees know that they can use these spaces if they need a quiet workspace or a break from the open office. Employees with disabilities, requiring use of quiet workspace, will be provided with these spaces through their accommodation request.

2.4 Information and Communication Technologies (ICT)

Overview

We use a variety of technologies and digital tools. This includes our public website and social media platforms, as well as the digital tools employees use to do our work. We have identified accessibility gaps through the development of this plan. The opportunity we now have is ensuring that we give the appropriate resources to address these barriers. Our goals for improving accessibility are outlined below.

- 1. In the first half of 2023, we will partner with the Accessibility, Accommodation and Adaptive Computer Technology (AAACT) team at Shared Services Canada (SSC). Through this partnership, we will leverage a wide range of adaptations, alternate approaches, tools, training, services, resources, and adaptive computer technologies for employees with disabilities. This will allow us to explore, experiment, and learn about, inclusive design, collaborative workplaces, and adaptive solutions.
- 2. In 2023, we will increase organizational IT capacity and capabilities by adding a new accessibility coordinator in the information management and information technology team.
- 3. In 2023, we will develop a change management and communications plan to communicate existing and changing ICT policies, tools and activities that enable accessibility.
- 4. In 2023, we will assess our ICT accessibility capacity, using the proposed Government of Canada ICT Accessibility Scorecard and maturity model. Key Performance Indicators will be developed, defining what we are going to benchmark against and how we will know we are successful.
- 5. In 2023, we will develop new documents on accessibility in IT and/or integrate accessibility into existing IT documents. By doing this, we will set clear internal expectations on accessibility and will integrate accessibility into all activities.
- 6. Starting in 2024, we will ensure that accessibility considerations are formally incorporated into future IT development and procurements.

- 7. Starting in 2024, we will incorporate formal accessibility testing standards and validation processes into future IT development and procurement.
- 8. In 2024, the IRB will implement basic digital accessibility training for those involved in developing, procuring, or validating IT products. (if they have not previously received that training).

2.5 Communications (other than ICT)

Overview

The IRB aims to adopt plain language communication as much as possible, as it supports accessibility for a wide range of readers. We recognize that legal language, which we have to use sometimes because of the nature of our work, may be used alongside plain language. We are committed to ensuring that our communication channels remain as accessible as possible, through the following goals:

- 1. Through our ongoing website and intranet renewals, we will prioritize the user experience. This includes:
 - using accessibility checkers for new content. These are digital tools that automatically scan documents for accessibility
 - · removing unnecessary website content, and
 - · increasing the use of plain language
- 2. In 2023, we will develop and implement accessible branded Word, PowerPoint, and all-staff emails templates that all IRB employees can use.
- 3. In 2023, we will develop a checklist and/or tools to guide employees in making documents accessible in Word, PowerPoint, PDF, Excel, Outlook and other media and digital content (e.g., alt tag texts).
- 4. In 2023, we will develop guidelines on plain language for external and internal communications. These standards will set plain language expectations, including when they will and will not apply. For example, the guidelines may not apply to some legal documents. We will share these standards through our Digital Communications Committee and intranet.
- 5. In 2023, we will produce and publish an accessible and plain language video series that explains the refugee claim process.
- 6. In 2023 we will hire a plain language writer to support simpler writing across the Board.
- 7. In 2023 we will review our website content for plain language.
- 8. In 2023, we will clarify our process for providing documents in alternate formats upon request.
- 9. In 2023, we will review all PDF forms on our website to make sure they are accessible. We will also review forms and web content on our intranet to make sure it is accessible. In 2024, we will make sure that all previous PDF forms are accessible (if they are IRB forms).
- 10. Starting in 2023, we will conduct ongoing user experience testing. This testing will make sure that our public website content meet accessibility and user experience best practices.-
- 11. In 2023, we will evaluate the feasibility of redesigning the menu of options for the IRB's telephone system to make it clearer and more accessible.
- 12. In 2023, we will explore how we meet the needs of deaf people and other people who use sign language to identify barriers and opportunities for improvement. This includes people appearing before the IRB in either in-person or virtual hearings.

- 13. Starting in 2024 and ongoing, we will provide training on plain language to decision-makers (known as Members) (if they have not previously received that training). By the end of 2024, we will also conduct digital accessibility and plain language awareness sessions.
- 14. By the end of 2024, new external documents will meet the plain language guidelines.
- 15. If feasible, we will implement improvements to our menu of telephone options by the end of 2024.
- 16. Starting in 2025, new documents created in Word, PowerPoint, PDF and Excel will be accessible.
- 17. By 2025, we will implement the ability to develop HTML forms.

2.6 Procurement

Overview

We follow the standards set by the PSPC when it comes to buying the things we need, a process that is called procurement. However, we can improve how we think about accessibility when buying things. This will support our shift towards a more proactive approach to accessibility. Buying things that are accessible is also easier and less expensive than fixing them later on.

Actions to improve accessibility

- 1. In 2023 we will ensure that accessibility considerations are added to procurement directives, policies, checklists, requirement templates, and template contracts.
- 2. In 2023, we will establish a Source List for required accessibility services (e.g., Braille, digital audio, captioning, descriptive video, sign language interpretation).
- 3. By December 2024, contracting officers will receive training on how to support employees to incorporate accessibility into procurement (if they have not previously received this training).
- 4. From 2025 onwards, accessibility will be explicitly considered in procurements by either documenting the decision to not incorporate accessibility requirements or by including accessibility requirements.

2.7 Design and delivery of programs and services

Overview

The IRB is an administrative tribunal. That means it is less formal than the courts but has specialized knowledge in a particular area of law. Our main goal is to hear and make decisions on immigration and refugee cases. In this role, the IRB interacts with people that appear before it. We do this in lots of different ways, including discussions, forms, documents, hearings, and decisions.

We regularly interact with two groups:

- Lawyers and representatives that support people appearing before the IRB, and
- People who need a decision from the IRB. This includes people making refugee claims (called "claimants"), people appealing legal decisions (called "appellants"), people who are being detained (called "detainees"), and people who are waiting for a decision on their ability to enter into or remain in Canada (called "applicants.")

This second group of people sometimes don't have lawyers or other representatives. And sometimes they don't know how our processes work or how to ask for help or accommodations. They might be reluctant to ask for accommodations.

We are committed to addressing any inaccessible systems or structures that we have, including adopting trauma-informed approaches to adjudication, as required. There are further steps we will take to strengthen our commitment.

Actions to improve accessibility

- 1. In 2023, we will review Guideline 8: *Procedures with Respect to Vulnerable Persons Appearing before the IRB*. This review will include ensuring that the Guideline is respectful and responsive to the needs of people with disabilities appearing before the Board.
- 2. Many of the actions to improve accessibility in other sections will also improve the accessibility of our programs and services. This includes:
 - a Starting in 2024 and ongoing, IRB staff will receive disability sensitivity and accessibility awareness training (if they have not previously received that training).
 - b Starting in 2024 and ongoing, we will provide training on plain language to decision-makers (known as Members) (if they have not previously received that training). By the end of 2024, we will also conduct digital accessibility and plain language awareness sessions.
 - Various improvements to website and document accessibility, as described in the <u>information and communications technology</u> section and the <u>communications</u> section.

2.8 Transportation

Overview

We do not run any transportation services; therefore, we have not developed any goals or actions in this area.

3. Consultations

We recognize that people with disabilities are the primary experts on accessibility. We are committed to listening to people with disabilities and learning about their needs and experiences. This accessibility plan was developed by consulting with people with disabilities, including IRB employees and members of the public who have disabilities.

To help us identify any specific barriers to accessibility that employees have experienced, we invited all employees with disabilities to participate in a focus group. We asked about people's experiences and for feedback on how we can do better. Common themes that came up were about whether accessibility was prioritized at the IRB, challenges around requesting accommodations, and a need for disability sensitivity training.

An anonymous, electronic survey was also sent to all employees. Employees with disabilities were our focus. Individuals who may not have a disability were also able to provide valuable input. The survey asked employees to share their experiences and thoughts about accessibility while working at the IRB, as well as any barriers they might have seen or experienced. We received 135 responses, mostly in English. Of those respondents, 51 identified as people with disabilities. About half of the respondents with disabilities shared positive experiences to share. Their positive comments were largely about the support they had received from their teams and work-from-home/ hybrid work arrangements. Barriers identified through the focus groups and surveys have been incorporated into the actions to improve accessibility in this plan.

We also held a focus group for people with disabilities from the public. This group of people does not work for the IRB. Instead, they provided perspectives on our work as Canadians with disabilities. The consultation focused on information and communication technology, communications, and employment. Feedback received through the consultation session was analyzed and incorporated into the identified list of barriers in this plan.

Finally, we also consulted on this plan with people and organizations that work with refugees and immigrants. This is a committee of organizations that work in immigration. They shared barriers that they knew of from appearing before the Board.

4. Conclusion

The IRB takes accessibility, along with all other areas of equity, diversity, and inclusion, seriously. Ensuring that our processes and decisions are fair, equitable and accessible supports our goal of making good decisions, both for the people who come before the Board and for Canada. We aim to make our organization as safe and accessible as possible to employees and other stakeholders. We recognize that this will require diligence and patience over the life of this accessibility plan and beyond. We look forward to continuing to work with people with disabilities to help us guide this work.