

# Accessibility Action Plan

Our offices are located on the traditional lands of the WSÁNEĆ and Ləkwəŋən (Lekwungen) Peoples, the hən'q'əmin'əm' (Hun'qumyi'num), Skwxwú7mesh (Squamish) and Secwepemctsín (Shuswap)-speaking Peoples. Our work extends across the homelands of the Indigenous Peoples within what we now call British Columbia. We honour the many territorial keepers of the lands and waters where we work, both past and present.



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# **Accessibility Action Plan**

#### Introduction

The <u>Accessible British Columbia Act</u> (ABCA), enacted by the Government of British Columbia in 2021, requires that certain public bodies establish an accessibility committee, develop an accessibility plan and put a process in place to get public input on accessibility matters.

This accessibility plan includes guidance from the Government of British Columbia and Accessible Employers BC, input from our Accessibility Advisory Committee and insights from other interest-holders. This plan is a roadmap for lessening and removing barriers and promoting inclusivity within Consumer Protection BC.

The plan outlines specific actions in four key areas:

- 1. information, technology and communications
- 2. hiring and employment
- 3. identification of biases
- 4. the built environment

This plan is a living document and will change over time. It will be reviewed and updated at least once every three years to ensure adherence to the ABCA and we will create annual reports to check progress.

#### About us

Consumer Protection BC is a not-for-profit regulator responsible for overseeing certain industries and specific consumer transactions in the province. Our mandate is to license and inspect our regulated businesses, respond to consumer inquiries, investigate alleged violations of consumer protection laws, classify all general release motion pictures and educate consumers and businesses about their rights and responsibilities. For more information about us, please visit www.consumerprotectionbc.ca.

# Our commitment to accessibility

Our business activities, regulatory work, education efforts, interactions and corporate culture are guided by the tenets of diversity, equity, inclusion and accessibility. Given our authority to regulate BC's consumer protection laws, we acknowledge our responsibility to all British Columbians and honour the impact we can have to effect change within the province.



# Values and working environment

Everyone who works here has different experiences and skills and brings varied perspectives to the table. Our corporate values are what bind us together and guide the delivery of our services.

**Curiosity:** We seek out information using a fair and balanced approach. We create space for continuous learning and diverse perspectives.

**Integrity:** We take ownership of and responsibility for our work. We treat others with respect and dignity.

**Impact:** We empower others by providing resources and education. We strive to make a positive difference.

Consumer Protection BC is a place where there is respect for all dimensions of diversity. These dimensions are intrinsic to who we are. Our employees work in an equal opportunity workplace, where all individuals are supported in a safe environment that is committed to continuous learning and dialogue to become an ally for change.

# Message from the board and leadership

As the board and leadership of Consumer Protection BC, we are committed to promoting accessibility and inclusivity in all aspects of our work. We believe that everyone deserves equal opportunities to take part, contribute and thrive. Accessibility reflected in our policies, practices and initiatives is designed to remove barriers and create a welcoming environment for all. The Accessibility Action Plan is our guide to implement changes that enhance accessibility, ensuring that our organization is inclusive and respectful for all individuals.

# Acknowledgement of key contributors

We gratefully acknowledge the Government of BC, Accessible Employers BC, Disability Alliance BC, our initial Accessibility Working Group and our Accessibility Advisory Committee for their invaluable support in preparing the Accessibility Action Plan. Their guidance, resources and commitment have been instrumental in shaping a comprehensive plan that aims to make our organization more inclusive and accessible.

#### **Definitions**

These definitions are from the ABCA:

"accessibility" refers to the design of products, devices, services or environments for people who experience disabilities.

"accessibility committee" means a committee under section 9. This committee must be set up to assist in identifying barriers to individuals in or interacting with the organization



and advise the organization on how to remove and prevent barriers to individuals in or interacting with the organization.

"accessibility plan" means a plan under section 11. The plan must identify, remove and prevent barriers to individuals in or interacting with the organization.

"disability" means an inability to participate fully and equally in society as a result of the interaction of an impairment and a barrier.

**"barrier"** is anything that hinders the full and equal participation in society of a person with an impairment and can be caused by environments, attitudes, practices, policies, information, communications or technologies, and affected by intersecting forms of discrimination.

"impairment" includes a physical, sensory, mental, intellectual or cognitive impairment, whether permanent, temporary or episodic.

# Our accessibility story so far

Between 2021 and 2023, after research and consultations, we implemented various diversity, equity, inclusion and accessibility initiatives, best practices and programs including the following:

## Internal policy, practices and external communications:

- Our website was created with the user in mind, with a focus on plain language.
- We reviewed our website, social media channels and video and image library from a
  diversity, equity and inclusion perspective and made updates where necessary.
  This included captions on videos, diverse imagery, not using sense-dependent
  explanations in a call to action, using CamelCase hashtags and using appropriate
  level headings on our website.
- Our corporate editorial style guide was updated to include inclusive and plain language.
- We updated the People and Culture Blog on our website and our online applicant portal to offer information about accessibility and recruitment accommodation requests.

# People & Culture (HR):

 We introduced Inclusion, Diversity, Equity, and Accessibility (IDEA) as an annual reporting item to the Board of Directors Human Resources & Compensation Committee.



- We amended the Board of Director recruitment process, introducing a screening approach that removes any identifying information from resumes, which contributed to selecting candidates with diverse backgrounds at a higher rate.
- We revised our job descriptions to introduce new anti-discrimination and values language. This allows applicants and current employees to better understand what is expected of them.
- We removed statements from our job descriptions about mandatory selection criteria requiring specific post-secondary education, diplomas or degrees; and replaced it with a statement about substituting a combination of related education and experience.
- We request employees voluntarily self-identify disability or cultural diversity factors on our employee engagement assessment.

## **Orientation and training practices:**

- We invite all our staff to include their pronouns in their email signatures and we raise awareness internally about why this practice is important.
- We continue to invest in staff training around diversity, equity, inclusion and accessibility. This includes staff learning on gender equity (intersectionality), Indigenous Cultural Safety and microaggressions.

# Our approach and guiding framework

Three guiding principles serve as the foundation for our Accessibility Action Plan:

- **Relevance:** The actions in this plan are tailored to the specific needs of our organization. This ensures that they are strategically positioned for a measurable enhancement in accessibility.
- Reasonableness: Given the constraints of financial and human resources, the
  actions in this plan must be reasonable within the context and scale of our
  operations.
- **Actionability:** We intend for the actions in this plan to be realistic, achievable within a certain timeframe and impactful.

# Accessible British Columbia Act principles

This plan will always consider the following principles:

 Inclusion: We strive to create a sense of belonging by ensuring equitable access for all.



- **Adaptability:** We encourage flexibility and resilience in a change process that creates a more inclusive and accessible culture within our organization.
- **Diversity:** We recognize that ability and disability come in many different forms and that conflicting accessibility needs may require multiple options for each accommodation.
- **Collaboration:** We work collaboratively to build inclusion across departments and divisions with subject matter experts and those with lived experience.
- **Self-determination:** We recognize that self-determination is fundamental for people with disabilities.
- **Universal design:** We encourage universal design principles in all our facilities and services so that they can be accessed, understood and used to the greatest extent possible by all.

# Other legislation

In addition to ACBA, we considered several other statutes, including:

- UN Convention on the Rights of Persons with Disabilities
- Constitution Act, 1982 (Canadian Charter of Rights and Freedoms)
- Accessible Canada Act
- BC Human Rights Code
- BC Workers Compensation Act
- <u>Business Practices Consumer Protection Authority Act</u>
- Administrative Agreement
- BC Building Code, 2024

We also considered the following non-legislative documents:

- Consumer Protection BC's Standards of Conduct
- BCGEU and Consumer Protection BC Collective Agreement (2022-2024)
- excluded staff employment agreements
- corporate policies, procedures and/or guidelines, where relevant

# About our Accessibility Advisory Committee

Our Accessibility Advisory Committee was established in May 2024. The overall purpose of the committee is to help identify, remove and prevent barriers to individuals in their interactions with our organization.

#### Initial focus of the committee

The first focus of the committee was to advise on the development of an organizational accessibility plan, with the initial plan published in September 2024 and to advise on the



process for getting and responding to comments or feedback on the Plan and any barriers to inclusion.

Committee members will review and recommend actions related to any accessibility feedback. They will help identify accessibility and inclusion barriers that employees and community members experience or may experience while interacting with our organization.

#### Recruitment and appointment process

Committee members will strive to reflect the diversity of the community, with experience, knowledge and expertise applicable to the purpose of the committee.

The committee will be made up of up to five employees and include at least one committee member from each office location and will have no more than one member appointed from a team or department. Committee members will be selected by the committee chair from a pool of candidates who show:

- an interest in participating on the committee
- a desire to learn more about accessibility
- a willingness to act as a corporate accessibility advocate

The committee chair will be the Vice President as assigned by the CEO. The committee secretary will be the People & Culture Administrator.

To support the purpose of the committee, formal relationships will be established and maintained with relevant organizations who can provide subject-matter expertise on issues of accessibility.

#### **Committee members**

The Accessibility Advisory Committee members are:

- Acacia Hooker, People & Culture Administrator (Victoria), committee secretary
- Amanda Panthaki, Business Practices Officer (Victoria)
- Dan Stefanson, Vice President (Victoria), committee chair
- Justin Illien, Licensing & Information Officer (Victoria)
- Natalie Reid, Inspector (Burnaby)

#### Consultations

To develop the priority areas for our Accessibility Action Plan we relied heavily on the guidance, training and recommendations provided by the Province of BC, Accessible Employers BC and the BC Disability Alliance. In 2023 and 2024 we also consulted a small group of employees to identify potential barriers within our workspace and service



offerings. We also conducted information interviews with accessibility service providers and other public bodies who are subject to the *Accessible BC Act*.

#### Feedback mechanism

An accessibility page has been created on the Consumer Protection BC website. This page includes public-facing information such as a copy of our Accessibility Action Plan, a space to report back on our efforts, and describes how to provide us with feedback. We can accept public feedback through an online form (which supports anonymous submissions), or by email, phone, fax or mail. The page also includes information about the protection of respondent's personal information.

Public corporate documents such as our Business Plan and Annual Report will also ask for accessibility feedback by linking back to the accessibility page. The Accessibility Advisory Committee will review and discuss all feedback, evaluate the Plan's impact and suggest actions to address any barriers. Our annual accessibility update reports will summarize the feedback and list the actions taken to address the concerns.

#### Barriers

Our interactions with the public, licensed business and other interest holders are mostly done through the internet, social media, website, written communication or phone calls. Therefore, the priority action areas in this plan focus on making these existing engagement channels more accessible, and we have committed to meeting the minimum Web Content Accessibility Guidelines. We will continue to consult with employees, consumers, licensed businesses and other interest holders to identify other barriers that should be addressed in future years.

# Our three-year plan

# **Summary**

Based on a review of the ABCA and with the guidance of Accessible Employers BC, our Accessibility Working Group recommended priority areas of focus in February 2024. After consulting with our Accessibility Advisory Committee, getting employee feedback and attending information sessions with accessibility service professionals, we refined and got leadership approval for the following priority areas.

# **Priority Area 1: Information, technology and communications**

We are committed to creating a barrier-free digital environment that is accessible to internal and external users. We will work towards meeting the minimum requirements of the Web Content Accessibility Guidelines (WCAG) for our corporate website. The first priorities will include meeting the following guidelines for our corporate website:



- all elements related to providing text alternatives for any non-text content (Guideline
   1)
- text and images of text have a contrast ratio of at least 4:5:1 (part of Guideline 1.4)
- ensure that website is compatible with assistive technology tools such as allowing content to be operable through a keyboard (Guideline 2.1)

Also, all communications and marketing materials, including corporate documents and social media content, will:

- follow the high-contrast ratio best practices for design and colours, using <u>a contrast</u> checker
- include imagery that depicts a diversity of people with varied abilities

#### **Priority Area 2: Hiring and employment**

To create a safe space for self-disclosure, we will:

- expand on our stated commitment to inclusion, diversity, equity and accessibility to better-define our accessibility principles
- begin to measure the aggregated diversity and intersectionality metrics of our job applicants by collecting voluntary and confidential, self-identification demographic data
- encourage job applicants to provide confidential self-disclosures and/or requests for accommodation throughout our recruitment and selection processes
- inform employees during orientation of their right to self-disclose and be reasonably accommodated and routinely provide reminders throughout the employee journey

Our culture will welcome and support diverse candidates and employees by committing to:

- reducing or eliminating barriers identified within our current job application, interview questions and assessment processes
- being prepared to document, track and respond to accommodation requests to provide applicants and employees with timely and reasonable accommodation support
- examining our corporate policies and procedures for opportunities to reduce barriers that affect workplace accessibility at all levels (individual, relational and organizational)
- reviewing our training, development and career progression past practices for opportunities to better support, engage and retain a diverse workforce



 using our website, recruitment materials (job advertisements) and the People and Culture Blog to talk about our commitment to workplace accessibility and diversity

#### Priority Area 3: Board member and employee bias identification

To identify and reduce accessibility barriers due to potential board member or employee biases, we will:

- continue to support employee-initiated requests for sponsored training and development related to inclusion, equity, diversity and accessibility (IDEA) topics
- implement mandatory Gender-based Analysis Plus (GBA+) training for employees, to increase employee awareness of intersectionality and identification of equity barriers/gaps
- provide hiring managers regular training about identifying implicit biases to improve our collective ability to support the recruitment of diverse, qualified individuals
- educate our supervisors (via Accessible Employers BC) about our responsibilities under the duty to accommodate and inquire (BC Human Rights Code) and best practices to support self-disclosure and create an accessible workplace culture
- continue to use our internal engagement platform to share IDEA information and educational resources with all employees with a new focus on accessibility to raise awareness and foster an accessible workplace and culture

# **Priority Area 4: Built environment**

Updates to the BC Building Code (including updated accessibility standards) were brought into force in March 2024. These updates were designed to help make sure buildings are designed and constructed so everyone can:

- · approach, enter and move throughout
- use the facilities and services
- exit buildings

We have two offices, one located in Burnaby and one in Victoria. These offices are used as a hybrid work location by employees and the board directors but are rarely accessed by the public or licensed business representatives. Therefore, accessibility actions for each office will focus primarily on the needs of employees and board directors.

To identify and reduce barriers in our offices, we plan to:

 update our Employee Handbook to provide clear support for workplace physical accommodations and to remove any process barriers to accommodation requests



- review and update our Joint Occupational Health and Safety Committee safety inspection checklists to reflect any accessibility issues
- get guidance from the accessibility service sector and our employees and address any noted barriers in our Victoria and Burnaby office locations
- ensure that any office construction or renovations meet the accessibility requirements of the updated BC Building Code

## Pledge to measure

As a member of the BC Accessible Employers network, Consumer Protection BC has made and will fulfill the pledge to measure; we will:

- use the annual employee engagement survey to solicit voluntary self-disclosures from employees identifying as persons with a disability and other demographic information
- publish the self-reported numbers of employees with disabilities in our organization in annual accessibility progress reports

# Monitoring and evaluation

#### **Monitor**

We will develop annual accessibility progress reports in consultation with the Accessibility Advisory Committee. We will summarize any progress in our corporate Annual Report, published in June.

#### **Evaluate**

This Accessibility Plan will be subject to a full review and be updated at least once every three years, adhering to requirements of the ABCA.

#### **Iterate**

The Accessibility Plan will be republished whenever material updates are made. These updates could include new provincial standards, additional feedback from our interest-holders and new action items considered by the Accessibility Advisory Committee.

# How to give us feedback

We want to hear from you. Please let us know if you've faced any accessibility issues while trying to use our services or in talking to us. Email us with your feedback at <a href="mailto:accessibility@consumerprotectionbc.ca">accessibility@consumerprotectionbc.ca</a>.