



# Accessibility Plan

2022-2024

Public Sector Pension Investment Board  
(PSP Investments)

Updated on  
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## Purposes

PSP Investments is one of Canada's largest pension investment managers with C\$264.9 billion of net assets under management as of March 31, 2024. Established in 1999, PSP Investments manages and invests amounts transferred to it by the Government of Canada for the pension plans of the federal Public Service, the Canadian Forces, the Royal Canadian Mounted Police and the Reserve Force. Headquartered in Ottawa, PSP Investments has its principal business office in Montréal and offices in New York, London and Hong Kong.

At PSP Investments, we strive to treat all people with respect and in a manner that allows them to maintain their dignity and independence. We are firmly committed to meeting our obligations under the Accessible Canada Act (ACA) with respect to appropriate accommodation for persons with disabilities.

The purposes of this Accessibility Plan are to:

- Ensure that workplace accommodation requirements are addressed on a case-by-case basis for job applicants, employees and consultants working in our offices with a disability;
- Achieve a work environment that promotes dignity, integration and equal opportunity and is supportive of job applicants, employees, consultants and others working in and visiting our offices;
- Provide accessible internal and external communications and events for job applicants, employees, consultants and members of the public;
- Comply with all applicable legislation; and
- Establish an efficient process for accommodating disabilities that is consistent with the principles of confidentiality and shared responsibility.

Accommodating disabilities in the workplace is PSP Investments' shared responsibility along with any other relevant parties as needed.

This Accessibility Plan will include information on the identification and removal of barriers, and the prevention of new barriers, in the areas described in Section 5 of the ACA, which are:

- Employment
- The built environment
- Information and communication technologies (ICT)
- Communication, other than ICT
- The procurement of goods, services and facilities
- The design and delivery of programs and services
- Transportation

## Definitions

Barrier is defined by the ACA 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(ies), as defined in the ACA means 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, in interaction with a barrier, hinders a person's full and equal participation in society.

## Feedback

**Sarah Cavanagh, Manager, Equity, Inclusion and Diversity**, is responsible for receiving feedback on behalf of PSP Investments. Sarah Cavanagh can be contacted at:

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Please contact **Sarah Cavanagh, Manager, Equity, Inclusion and Diversity** for any information regarding PSP Investments' Accessibility Plan, including:

- A copy of the Accessibility Plan in one of the alternate formats described in subsection 8(2) of the Accessible Canada Regulations (Regulations);
- A description of PSP Investments' feedback process in one of the alternate formats described in subsection 9(5) of the Regulations; and
- To provide feedback to PSP Investments.

# Areas described under section 5 of the ACA

## 1. Employment

### Current State:

- As part of the statement of work template with recruitment firms, we at PSP Investments have embedded diversity targets aligned with external market availability for designated groups for our shortlisted candidates, including people with disabilities
- A job applicant self-identification survey is now included in the application process, allowing us to ensure that our candidate pool is representative of market availability
- As part of our job postings, we proactively ask candidates to reach out if they require any accommodations, “At PSP, we aim to provide an inclusive workplace where we leverage diversity and where everyone feels valued, safe, respected and empowered to grow. As part of this leadership commitment, we strongly encourage applications from all qualified applicants and strive to offer an inclusive and accessible candidate experience. If you require any accommodation for any part of the recruitment process, please let us know.”
- Our Divers Abilities in Action Affinity Group offer awareness- building sessions, on neurodiversity, mental health and other disabilities, which are available to all employees to help remove stigma and stereotypes
- We encourage people with disabilities to share their stories, which are published on our intranet
- We have development offerings and support for people leaders to ensure they listen to their employees and create an inclusive work environment
- Our flexible benefits program allows employees to tailor to their individual and family needs
- We offer virtual healthcare, including for mental health
- Employees with underlying medical conditions can contact our human resources department to find a reasonable accommodation solution
- Personalized ergonomics consultations are available to all employees

### Identified barriers:

#### *Recruitment*

- Representation in certain job roles and candidate pools
- Active recruitment of persons with disabilities

#### *Onboarding and Training*

- Programming that is tailored for persons with disabilities

#### *Accommodation Support*

- Approval processes for accommodation requests
- Employment policies that detail how employees can access accommodation information and make requests
- Implementation of accommodation requests

#### *Retention*

- No barriers have been identified

## IMPROVEMENT PLAN:

Future State	Target Implementation date	2023 Progress report	2024 Progress report
– Explore partnerships with associations or groups that would better reach people with disabilities.	March 31, 2023, short term	Partnership established and others to be explored on an ongoing basis.	Continuing to explore potential partnerships.
– Develop a neuro-diversity employment opportunity program in partnership with an organization that could offer support to both the candidate, welcoming team and manager.	March 31, 2023, short term (underway)	Potential partnerships have been explored and implementation date of the program is being revised.	Potential partnerships have been explored and future partners have been identified.
– Simplify request/approval processes ensuring both easier access to accommodations while protecting the psychological safety and dignity of the employee making the request (this could be done in partnership with an external consultant).	June 30, 2023, middle term	Ongoing and implementation date revised to June 30, 2024	Process has been carefully mapped taking into account both ease of logistics and psychological safety of employees. New process to be implemented in 2025.
– Monitoring our potential candidate pools to ensure they are representative of workforce availability.	March 31, 2023 (underway)	Candidate questionnaire developed and implemented and ongoing monitoring established	Monitoring is ongoing and questionnaire at the application stage have been implemented.
– Monitor the percentage of candidates who identify as having a disability in ratio- comparison to the percentage hired. This will allow us to see if the numbers indicate a potential hiring barrier.	March 31, 2023 (underway)	Candidate questionnaire developed and implemented and ongoing monitoring will be established	Ongoing monitoring established and in progress.
– Add a focus on people with Disabilities to our Employee Engagement survey and track engagement survey results and inclusion index and comments for people who identify as having a Disability in order to address any potential gaps and inequities, even though our current talent flow analysis does not indicate a higher turnover rate for people who identify as having a Disability and no retention barriers have been identified to date.	June 30, 2023, middle term	Additional questions added to our self-identification survey and monitoring of feedback is ongoing	Additional questions added to our self-identification survey and monitoring of feedback is ongoing
Work with a consultant to review various aspects, including physical space, digital tools, and psychological health and safety, to ensure that we are not overlooking any potential barriers throughout the employee lifecycle. Recommendations will help establish priorities and timeline.	September 30, 2023	This action item is being re-evaluated as some items are being addressed through internal expertise.	This action item is being re-evaluated as part of our next action planning.

## 2. The Built Environment

### Current State:

- Ability to provide specific equipment for different needs, including footrests, desks, chairs, back support, anti-reflective screen, larger high-contrast screens, ergonomic mouse, ergonomic keyboards, earphones for hearing impaired
- Ergonomic internal team to provide support
- Build according to construction code
- Four automatic doors
- White noise
- Lighting accommodation
- Access to the building is accessible
- Accessible vehicle parking available in parking garage
- Specific evacuation plan for employees with reduced mobility condition

### Identified barriers:

#### Workspaces

- Spaces that can be easily tailored to accommodate persons with disabilities
- Spaces that take into account sound, ergonomics, and other spatial issues for persons with Disabilities
- Support services offered

#### Physical structures

- Identifying issues with building or office facilities
- Signage
- Toileting

#### Emergency Measures

- Emergency procedures that do not create obstacles for persons with Disabilities

### IMPROVEMENT PLAN:

Future State	Target Implementation date	2023 Progress report	2024 Progress report
<b>Workspace</b>			
Perform an internal audit to identify facility gaps within premises.	June 30, 2023, middle term	Expected to be delayed to 2024	Postponed to 2025 as part of our gap analysis to help build our next action plan.
Increase signage and visibility.	June 30, 2023,	Gradual implementation and improvements	Continued improvements including evacuation procedures and signage; proactive awareness material of available wellness support tools in employees washrooms (MTL)
Additional automated doors.	June 30, 2023, mid-term,	This action item is being re-evaluated and will be prioritized based on needs and budget	This action item will be completed in 2025.
Enhance tranquility. Enhance sound masking (white noise)	December 31, 2023, long term,	This action item is being re-evaluated based on needs	Regular maintenance and balancing of white noise systems has been established.
Allow employees to discuss specific needs regarding their own working station.	June 30, 2023, short term (underway)	Completed and ongoing practice	Completed and ongoing practice
Inform employees about ergonomic workspace options.	June 30, 2023, short term	Completed and ongoing practice	Completed and ongoing practice
Inform onboarding automated task to get new employee physical/facility specific needs.	June 30, 2023, long term,	Completed and ongoing practice	Completed and ongoing practice
Inform employees about ergonomic equipment including Footrest, Desks, Chairs, Back support, Anti-reflective screen and other technology equipment.	June 30, 2023, long term,	Completed and ongoing practice	Completed and ongoing practice
Align ergonomic equipment attribution process for all PSP offices.	March 31, 2024, long term,	Completed and ongoing practice	Completed and ongoing practice

Physical structures			
Inform employees of the process for any accessibility question related to the building.	March 31, 2024, mid term,	Completed and ongoing practice	Completed and ongoing practice
Evaluate ways to include emergency measures for visual or auditory disabilities. Hire specialists to identify our gaps and provide us with recommendations.	September 30, 2023, long term, it needs to be aligned with the recommendations from our consultant	Timeline of this action item is being revised.	A mass email notification is sent to all employees when the building alarm reaches 120 bpm, which indicates the need to evacuate.

### 3. Information and communication technologies (ICT)

**Current State:**

Use of Microsoft Office which allows for possibility to change resolution, possibility to modify text (font, size, etc.), high contrast, text to speech, live captions and other desktop settings

**Identified barriers:**

- Limited offerings of software, tools and equipment to persons with Disabilities
- Unknown level of internal and external Web Content Accessibility Guidelines (WCAG) compliance, including applications provided by third parties
- Lack of resources for onboarding new employees with disabilities
- Limited internal expertise on accessibility

IMPROVEMENT PLAN:			
Future State	Target Implementation date	2023 Progress report	2024 Progress report
Identify Champions and define PSP preferred implementation approach as well as our target WCAG level.	June 30, 2023	Currently reevaluating target date based on assessment of needs	Champions have been identified and preferred implementation approach is defined.
Offer training to our managers, internal services and IT groups to ensure they are knowledgeable on accessibility issues including various accommodations tools, equipment and technology standards.	September 30, 2023- March 31, 2024	Other target dates will be reestablished based on the results of the detailed needs assessments	Training has been offered to champions and further training needs are being evaluated.
Audit our most used internal and external applications (most users). <ul style="list-style-type: none"> <li>- For internal systems: Include accessibility guidelines in our solution reviews (for example AA).</li> <li>- For new external systems: Include questions about WCAG in our software acquisition process, ask vendors to commit to a road map.</li> <li>- For existing external systems: Remind vendors about our commitment to WCAG principles.</li> </ul>	December 31, 2023- March 31, 2024	Gradual implementation of accessibility requirements as we upgrade systems, while prioritizing those that impact all employees.	Gap assessment is underway for systems with more than 1000 users. For other solutions, a new wave of gap assessment will be performed
Evaluate membership with IAAP (Internal Association of Accessibility Professionals) or other resources (based on our perceived need for additional expertise and our increased awareness) <a href="http://www.accessibilityassociation.org">www.accessibilityassociation.org</a>	March 31, 2024	Target date remains accurate	Evaluation was done and PSP is now a member.
Review PSP process and policies to facilitate specialized software and devices provided by the employee (BYOS / BYOD) in the PSP environment: <ul style="list-style-type: none"> <li>- Integration of personal technology (BYOD)</li> <li>- Streamline new equipment acquisition process (Braille keyboard, etc.).</li> <li>- Increase visibility for the specialized equipment.</li> <li>- Leverage the buddy system currently in place to facilitate accessibility requests.</li> </ul>	March 31, 2025	Target date remains accurate	Target date remains accurate
Improve our support related to new accessibility requests and new technology options and implement a group responsible to monitor new options available.	March 31, 2025	Target date remains accurate	Target date remains accurate
Following the audit, improve the accessibility of our internal applications that are not to the level required.	March 31, 2025	Date to be reevaluated based on audit results and action plan	Internally developed applications with more than a 1000 users are being prioritized to ensure accessibility standards.



## 4. Communications, other than ICT

### Current State:

- When events take place at our offices or elsewhere, the venues are always accessible for individuals with reduced mobility
- Presentations are offered virtually
- Internal and external communications are drafted using clear and concise language
- Certain key documents on our website are offered in an accessible format

### Identified barriers:

#### Written Communications

- Writing styles

#### Multimedia

- Consistency in providing multimedia in accessible formats
- WCAG 2.0 compliance
- Offering all content in accessible formats

#### Events

- Accessibility of content provided at events

IMPROVEMENT PLAN:			
Future State	Target Implementation date	2023 progress report	2024 progress report
<b>Written Communications</b>			
Pay particular attention to the use of simplified terms and phrases.	Underway	Completed and ongoing practice	Completed and ongoing practice
Avoid jargon, complex syntax.	Underway	Completed and ongoing practice	Completed and ongoing practice
Simplify reading (titles, subtitles, etc.).	Underway	Completed and ongoing practice	Completed and ongoing practice
<b>Multimedia and Events</b>			
Add subtitles to the English versions of videos, in addition to the French.	March 31, 2024	Progressively being implemented	Progressively being implemented
Provide audio or video transcription upon request.	March 31, 2024	Available upon request	Available upon request
Provide sign language interpretation upon request. Make available the recordings of the events with subtitles in both languages. Sound control during events. Explore possibility of offering adapted transportation to facilitate travel to outdoor event locations and PSP offices.	March 31, 2024	Available upon request	Available upon request

## 5. The Procurement of Goods, Services and Facilities

### Identified barriers:

a. No specific set up for procurement of goods, services and facilities

b. Lack of discussions/deals with vendors and suppliers that facilitate accessibility

IMPROVEMENT PLAN:			
Future State	Target Implementation date	2023 Progress report	2024 Progress report
Remind vendors about our commitment to WCAG principles.	Beginning on April 1, 2023, for existing vendors, when each contract comes up for renewal; For new vendors, when a new contract is signed	Completed and ongoing practice	Completed and ongoing practice
Develop contractual clauses to include these requirements.	March 31, 2024	Target date remains accurate	Completed and ongoing practice
Include clauses in our contracts with vendors.	Begin integration starting April 1, 2025, for existing vendors, when each contract comes up for renewal; For new vendors, when a new contract is signed	Target date remains accurate	Target date remains accurate and will be initially implemented for long term contracts.
Ensure third-party applications respect the WCAG standard and arrange for audits to ensure compliance.	Approach to be planned by March 31, 2025	Target date remains accurate	Target date remains accurate and will be initially implemented for long term contracts.

## 6. The Design and Delivery of Programs and Services

### Identified Barriers:

- a. Lack of consistency in program and service delivery
- b. Inaccessible format and design of programs

IMPROVEMENT PLAN:			
Future State	Target Implementation date	2023 Progress Report	2024 Progress report
Provide color contrast for text and visual accessibility.	March 31, 2024	Completed*	Completed*
Increase sizes of visual elements (typography, boxes, images, etc.).	March 31, 2024	In progress and ongoing practice*	In progress and ongoing practice*
Implement accessible typography.	March 31, 2024	Target date remains accurate*	Target date remains accurate*
Provide, if possible, a text transcription of the images.	March 31, 2024	In progress for safety related and formal documents and available upon request for others.	In progress for safety related and formal documents and available upon request for others.
Ensure accessibility of some PDFs on the PSP website.	March 31, 2024	Completed and ongoing practice	Completed and ongoing practice

\* Training has also been provided on all these aspects to allow for ongoing application of these elements.

## 7. Transportation

### Identified barriers:

- a. Lack of accessible travel options to external events
- b. Lack of Accessible Parking

IMPROVEMENT PLAN:			
Future State / Ways to Improve	Target Implementation date	2023 Progress Report	2024 Progress report
<p>Offer adaptive transportation to facilitate travel to events at locations outside the PSP offices.</p> <p>Offer employees details about accessible entrance and available parking to mobility reduced candidates when coming in for an interview.</p> <p>Work with the building to ensure access to accessible parking for employees with mobility reduction</p> <p>Put in place a process for employees with mobility reduction to request accommodations for parking in the building.</p>	Plan to be completed by March 31, 2025	Target date remains accurate	Target date remains accurate

# Consultations

## 1. Whom We Consulted

In order to support our commitment to Equity, Inclusion and Diversity (Ei&D), in FY18 the Ei&D Council was created. The Ei&D Council's mandate was to globally evolve our inclusion culture and create a prosperous environment for diversity. It includes eight Affinity Groups, which represent different equity-deserving groups in our workforce. These groups are composed of volunteer employees who either identify as members of an equity-deserving group or allies to those groups. Their main role is to drive initiatives that foster inclusion and equity and create employee networks and support. Their co-leaders ensure alignment and monitor progress on initiatives.

One of these Affinity groups is People with Disabilities. Its main focus is to break biases about disabilities, whether physical or mental, visible or invisible through open dialogue. We have consulted the People with Disabilities Affinity Group to obtain their feedback and comments in order to improve our Accessibility Plan.

We also consulted with Kelly Bron Johnson, founder of *Completely Inclusive*, a social enterprise focused on helping organizations create truly inclusive and accessible workplace cultures to obtain her feedback and comments.

## 2. When Consultations Occurred

Consultations with the Affinity group, *People with Disabilities*: The first consultation occurred on September 1, 2022. We then circled back on October 7 to obtain feedback on future states. We shared a draft of the plan mid-November 2022 to obtain final feedback.

Consultations with Kelly Bron Johnson: These took place from October 28 to November 17, 2022.

## 3. Consultations were Conducted and Results of the Consultations

In the first consultation with the Affinity Group, we obtained feedback on our gap analysis on potential barriers for each area and suggested improvement areas. With the feedback obtained, we then drafted a future state for each area and circled back to the Affinity Group to, once again, obtain feedback and comments. The final consultation was after we completed a draft of the plan with the relevant information with respect to potential barriers and suggested improvement areas, as well as the future state for each area.

The consultation with Kelly Bron Johnson was done to ensure that our gap analysis and action plan was complete and inclusive of all accessibility considerations. The consultation included sharing all our processes and documentation with *Completely Inclusive* for their review and recommendations. This was followed by a clarifying meeting to address any questions and review recommendations to integrate into our accessibility plan and a final update of the plan.

## Budget and Resources

We will allocate sufficient financial resources to comply with this Accessibility Plan and its obligations under the ACA.

We will endeavour to provide reasonable accommodation to employees, job applicants, consultants and others working in our offices with Disabilities who are invited to submit requests for reasonable accommodation to their supervisor or our human resources department. We work cooperatively to determine whether reasonable accommodation is possible and to define appropriate accommodation measures to be implemented. These accommodation requests will be considered for all appropriate work locations, such as in-office or at home.

# Training

We are committed to breaking biases relating to Disabilities and creating a safe, equitable and accessible workplace for people living with all forms of Disabilities, whether physical or mental, visible or invisible. Our People with Disabilities Affinity group works in partnership with our Ei&D team to offer employees awareness and educational opportunities to break the biases and open dialogue on all types of Disabilities. We will provide training that is consistent with our Accessibility Policy and this Accessibility Plan. Training on accessibility standards will be provided to all our employees.

This training will be provided as soon as reasonably practicable after employees and consultants working in our offices commence their duties. The content and delivery of training may vary in accordance with the trainees' duties and responsibility and will include the following:

- the purposes of the ACA and its requirements
- the Canadian Human Rights Act as it pertains to persons with Disabilities
- how to interact, communicate and consult with people with various types of Disabilities, including use of accessible communication formats
- how to accommodate individuals that require the assistance of a service animal or a support person
- how to provide, receive and escalate feedback provided with respect to accessibility questions and concerns
- our policies, practices and procedures relating to providing services to people with disabilities

We will maintain a record of the training provided, including the training dates, and the name and number of individuals to whom it was provided, We may provide additional training as changes in legislation or workplace conditions require.

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