



“Nothing Without Us”



FINTRAC's accessibility plan – 2023 progress report

**Financial Transactions and
Reports Analysis Centre of Canada**

234 Laurier Avenue West
Ottawa, Ontario K1P 1H7 Canada

Telephone: 1-866-346-8722

Facsimile: 613-943-7931

fintrac-canafe.canada.ca

© His Majesty the King in Right of Canada, 2023.

ISSN: 2817-8629

Cat. N°: FD2-11E-PDF

Table of contents

A message from the employment equity, diversity and inclusion champion ..	4
General	6
Who we are and what we do	6
Feedback	7
Privacy statement	8
Call to action.....	9
Progress against planned activities.....	9
Employment.....	10
The built environment	17
Progress against planned activities.....	17
Information and communication technologies	19
Progress against planned activities.....	19
Communication, other than information and communication technologies	23
Progress against planned activities.....	23
The procurement of goods, services and facilities.....	24
Progress against planned activities.....	24
The design and delivery of programs and services	26
Progress against planned activities.....	26
Transportation.....	28
Progress against planned activities.....	28
Consultation with persons with disabilities	29
Feedback.....	30
Annex A – Managing the accessibility program	32
Governance	32
The employee network for persons with disabilities	32
Employment equity, diversity and inclusion (EEDI).....	32
Management advisory committee (MAC)	32
Executive committee (EXCO).....	33
Annex B – Distribution of persons with disabilities by occupational group...	34

A message from the employment equity, diversity and inclusion champion

I am pleased to present FINTRAC's first progress report against the three year [Accessibility Plan](#).

Accessibility is an important part of our call to action on anti-racism, equity, and inclusion as reflected in FINTRAC's [Employment Equity, Diversity and Inclusion \(EEDI\) strategy](#). Diversity and inclusion are essential to building a modern and high-performing federal public service and FINTRAC is embracing it as a core value of our corporate culture and leading by example.

This year's progress against our Accessibility Plan further demonstrates our commitment to being a model for accessibility and to the Government of Canada's commitment for all Canadians to be able to fully participate in society with barrier-free communities, workplaces and services.

We have accomplished much in this first year against our three key themes – Culture, Build Knowledge, and Employees Experience:

Culture – building a culture of inclusiveness and diversity is about raising awareness in an effort to influence behaviour. While there are many accomplishments that you will read about, such as inclusive hiring practices, particular emphasis has been placed on continuous learning in what inclusiveness and diversity really mean in all that we do and creating an environment where all employees can gain a greater understanding of their own biases and their impact. To note, we have incurred some delays with engaging a few key stakeholders and expect to advance on this in the upcoming year.

Build Knowledge – designed to ensure our key enabler function gains greater knowledge of what 'being accessible' means, our enablers have delivered on all commitments made. A key takeaway from this inaugural year is that, as a learning organization, increased knowledge is not just about checking a box; we must and will continue to grow our subject matter knowledge on accessibility on a continual basis.

Employee Experience – is about employees having a positive 'accessible' experience when being recruited and throughout their career with FINTRAC. We made great progress in improving the overall onboarding experience for new employees, including streamlining communication and training material. But we also recognize that this is an area that we

need to do better. The Accessibility Passport implementation has been delayed slightly, but once implemented in the coming months, it will be key to ensuring a structured dialogue where employees can express their needs for an improved work experience, including accommodation needs.

As part of our commitment to our *Nothing Without Us* slogan, members of the Employee Network for Persons with Disabilities (ENPD), have been instrumental in influencing change in the many products put forward, including the Accessibility Passport.

With the support from ENPD and others, the Centre will continue to build on its success in recruiting the best and brightest by removing barriers, understanding the potential impacts the new Canada Life health plan may have on our recruitment efforts, and to work harder to improve overall employee experiences for persons with disabilities.

General

Who we are and what we do

As Canada's financial intelligence unit and anti-money laundering and anti-terrorist financing regulator, FINTRAC plays a critical role in helping to combat money laundering, terrorism financing and threats to the security of Canada.

The Centre produces actionable financial intelligence in support of the money laundering and terrorism financing investigations of Canada's police, law enforcement and national security agencies. FINTRAC also generates valuable strategic financial intelligence, including specialized research reports and trends analysis, for regime partners and policy decision-makers, businesses and international counterparts that shines a light on the nature, scope and threat posed by money laundering and terrorism financing.

The Centre is able to fulfill its financial intelligence mandate by working with Canadian businesses to ensure compliance with the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act*. Compliance with the Act helps to prevent and deter criminals from using Canada's legitimate economy to launder the proceeds of their crimes or to finance terrorist activities. It also ensures that the Centre receives the information that it needs to produce financial intelligence for Canada's police, law enforcement and national security agencies.

FINTRAC's financial intelligence is in high demand internationally, as is its specialized intelligence and supervisory knowledge and expertise. The Centre is regularly asked to lead international conferences and workshops and to contribute to global research projects, training and bilateral and multilateral capacity-building initiatives.

In fulfilling its core financial intelligence and compliance mandates, FINTRAC is committed to safeguarding the information that it receives and discloses to Canada's police, law enforcement and national security agencies. The Centre understands that the protection of privacy is critical to maintaining Canadians' confidence in FINTRAC and Canada's broader Anti-Money Laundering and Anti-Terrorist Financing Regime.

Feedback

The Manager and Lead on Accessibility is the person responsible for receiving feedback on barriers and accessibility at FINTRAC.

To submit your comments, suggestions and questions on all matters relating to accessibility, barriers that you may have experienced while dealing with FINTRAC, or the implementation of the Accessibility Plan, you can contact us:

- By e-mail: Accessibility/Accessibilite@fintrac-canafe.gc.ca
- By telephone: 1-866-346-8722 (toll free)
- TTY (teletypewriter): 1 800-465-7735
- By mail:
 - Manager and Lead on Accessibility
FINTRAC
234 Laurier Avenue West
Ottawa Ontario K1P 1H7

Anonymous feedback can be provided by phone or by mail.

Please submit your request to receive this report in an alternate format, including in print, large print, braille, audio format or an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities, to: Accessibility/Accessibilite@fintrac-canafe.gc.ca

When submitting feedback on the Accessibility Plan, the implementation of the Accessibility Plan or any barriers you may have experienced while dealing with FINTRAC, please describe your experiences and how they affected you, and any recommendations you may have for how barriers can be removed. Also, include your contact information so that we may acknowledge receipt of your feedback, and contact you to gain a greater understanding of your comments.

The person designated to receive feedback on behalf of FINTRAC will log your information and may share with other areas of FINTRAC or government to help them address the barrier(s). All feedback received will form part of an internal report to ensure responsible management of every comment and request received, and to inform upcoming Accessibility Plans and Progress Reports.

Privacy statement

The feedback you provide through this consultation will be kept confidential and will be used only for the purpose of gathering your suggestions. Your submission is voluntary and we recommend that you do not provide any personal information. If you provide personal information, it will be protected under the provisions of the *Privacy Act* and described in the [Personal Information Bank PSU 938 entitled "Outreach Activities"](#). Also, please note that the Government of Canada will not make individual submissions public, but maintains the right to report publicly on the aggregate results.

For more information on your rights related to the *Privacy Act* please contact FINTRAC's Access to Information and Privacy Office at atip-aiprp@fintrac-canafe.gc.ca.

Call to action

[FNTRAC's Accessibility Plan 2023–25](#) (the Plan) consist of three key themes that have emerged from the initial self-assessment and consultation process that have informed FNTRAC's inaugural Accessibility Plan. They include:

- Continue to build on our **culture** of inclusiveness and diversity through ongoing awareness campaigns to ensure that accessibility is given forefront consideration on everything we do, such as, in the way we communicate both externally and with our employees through verbal and written communication, and the development and the purchase of information technology.
- **Build knowledge** and internal subject matter expertise on accessibility in our key enabling functions, such as information technology, accommodation, and procurement.
- Carry that same rigor of commitment to accessibility when recruiting employees, to ensure active support of the **employee experience** from the first day on the job to the ongoing positive work opportunities and professional growth.

Progress against planned activities

In 2023, the following progress has been made by the Centre against the three-year plan for each of the seven areas of focus:

Employment

In addition to the many achievements highlighted in the Plan published in December 2023, as reported in FINTRAC's Employment Equity Annual Report 2022-2023 and its corresponding Placemat, the Centre continues to make great strides toward reducing barriers for not only the Persons with Disabilities community, but for all designated employment equity communities. The following are a few key highlights:

- With the implementation of the modernized Staffing and Talent Acquisition policy suite (June 2021), it is no longer just about having a representative workforce, it is also about conducting our staffing activities in a manner that does not discriminate or create systemic barriers. The Centre is able to attract a more diverse candidate pool due to the language used in the candidate profiles (i.e., reduction of government lingo), the shift of mindset around recruitment and the accessibility/inclusion of the assessment and selection tools.
- The FINTRAC External Assignment Program (FEAP) facilitates temporary assignments between employees of the Centre and organizations outside the core public administration. Through an innovative partnership with third service provider With You With Me, the Centre filled vacancies with up-skilled talent from an underrepresented talent pool (i.e., Indigenous Peoples, Persons with a Disability, and women in STEM). FINTRAC is in the final stages of recruiting several individuals through this program in the IM/IT sector.
- As part of the Centre's talent acquisition strategy, hiring managers are empowered to take a holistic approach to assessment and selection, resulting in expanded potential candidate pools. Psychometric and behavioural tools, as well as skills centric tools, have been adopted as a means to reduce systemic barriers in the assessment process. In doing so, FINTRAC is leveraging a variety of non-typical government assessment tools that allow candidates of various cultural backgrounds and equity-seeking groups to showcase their potential and skillsets in the assessment and selection process.
- The Centre's talent management framework systematically factors employment equity considerations in order to reduce barriers to development, promote growth opportunities, and optimize each employees' skills. Talent management is also about equipping employees with the tools and support that they need to develop their careers in a way that is free of barriers and discrimination. Through conversations with their manager, employees are encouraged to explore opportunities such as coaching (e.g., Leadership Coaching Circles), mentoring, leveraging self-assessment tools and accessing training.

Theme culture

Planned Activity – Accessible Employment Forms. Leverage the implementation of the new Human Capital Management (HCM) system to make employment application forms accessible.

- Start and end date: October 2022 to March 2024

Accomplishments in 2023:

- ✓ Implementation of Human Capital Management (HCM). Workday is a provider of enterprise cloud applications for finance and human resources with a strong Belonging and Diversity program complete with a *Global Vision of Value Inclusion, Belonging, and Equity (VIBE) for All*. To note, FINTRAC acquired the human resources application. These applications are built with artificial intelligence and machine learning at the core. As such, HCM has many accessibility features built-in and have strategies in place to ensure the continued evolution towards being free of barriers.

FINTRAC is making full use of the HCM's capabilities including greatly reducing emails in favour of using intuitive workflows that simplifies collection of information (greatly reduced stand-alone forms), and a central location for employees to manage human resource centric tasks assigned to them.

FINTRAC is only months into working with the HCM and there is still much to learn about its capabilities and how to leverage them to render business processes more accessible. We expect to see ongoing improvements starting with preparing to launch the ability to accept employment applications through the HCM. Doing so will essentially eliminate the use of application forms and simplify the full application process on an accessible-by-design application. Information that is inputted during the candidate stage flows through to the employee side, for those who are selected.

Planned Activity – Inclusive Hiring Practices. Through the delivery of the HR sub-delegation training and other events, such as Manager Forums, influence change with the internal hiring processes and practices (i.e., use of psychometric tools, address systemic barriers caused by interviews, other lessons from the Neurodiversity recruitment initiative) to ensure the recruitment and continued growth/development of employees with disabilities.

- Start and end date: December 2022 to March 2025

Accomplishments in 2023:

- ✓ Since the Centre's participation in the Neurodiversity Recruitment Pilot in 2021, FINTRAC has met its target (5 people per year) in line with the Government of Canada's goal to hire 5,000 Persons with a Disability by 2025. FINTRAC has become a leader in the recruitment of Persons with Disabilities by leveraging external expertise, all the while continuing to develop deeper internal knowledge of inclusive and accessible recruitment, assessment, and selection.

Through an ongoing partnership with a third party service provider, FINTRAC continues to learn about systemic barriers in the recruitment methods that candidates with a disability could experience. To date, a mindset shift is taking place and methods for recruiting, assessing, selecting, and onboarding are being modified in order to incorporate the best practices learned and move the dial forward. Partnering with experts in this field has provided a great opportunity to: change the way we recruit and tap into this underutilized talent; expand and diversify our talent pool; innovate and enhance current recruitment and onboarding; increase team awareness of neurodiversity; and, build capacity for managing and leveraging a more diverse workforce.

We are especially proud to be the recipient of two prestigious awards in the past year, the Canadian HR Reporter's Innovative HR Teams 2023 Award, and the Michelle C. Comeau Human Resources Leadership (Team) Award. In both cases, FINTRAC was recognized for its work with the Treasury Board of Canada Secretariat's [Office of Public Service Accessibility](#) and a non-profit organization Specialisterne. As partners in a neurodiversity initiative, our work facilitated and propelled the recruitment and retention of individuals on the autism spectrum or with similar neurodiversities (neurodivergent) in professional positions.

- ✓ In order for our Executive cadre to obtain their Staffing and Talent Acquisition (STA) sub-delegation, managers are required to attend a training session that includes information regarding the Employment Equity Act, the importance of a diverse workforce, strategies to support employment equity in staffing actions, the employer's Duty to Accommodate, and considerations for increasing the inclusivity of assessment methods. Additionally, they are all required to complete the Canada School of Public Service's

Inclusive Hiring Practices for a Diverse Workforce (COR120) course.

Planned Activity – Language Matters – Training for Inclusive Communication. Leverage and augment existing leadership training programs to increase awareness on unconscious biases and the importance of language when communicating with all diversity groups, including persons with disabilities.

- Start and end date: April 2023 to March 2024

Accomplishments in 2023:

- ✓ FINTRAC modernized its [Employment Equity, Diversity and Inclusion \(EEDI\) strategy](#) to advance efforts to build and retain a diverse workforce that is representative of the Canadian population and to further embed diversity and inclusion in the Centre’s decision making. The strategy consists of four pillars: talent acquisition and retention; professional growth; leadership & accountability; and, employee engagement.

A key element to the Strategy is the addition of mandatory training on EEDI topics as part of the FINTRAC National Training Standards. A three-year learning path was developed and piloted with the EEDI working group, with additional courses geared specifically to employees in supervisory or managerial roles. The courses were identified in order to develop a baseline of common knowledge across all employees. This is a step towards fostering a culture of inclusion.

By March 31, 2024, employees will be required to complete Adopting an Inclusive Mindset at Work (INC122) and The Uncomfortable Truth (IRA102), with Leading Diversity (INC110) as an additional module for those in supervisory positions.

The new HCM system allows for the use of automation to track completion and continue to ensure that the mandatory courses are taken by employees according to the intended progression and timeline.

Theme build knowledge

Planned Activity – Increase Internal Accessibility Subject Matter Knowledge. To support hiring managers, our human resources (HR) community will focus on gaining a greater understanding on

what it truly means for its programs to be accessible. This will support efforts to provide better guidance, enhance tools, and further enhance the people management policy suite.

- Start and end date: April 2023 to Ongoing

Accomplishments in 2023:

- ✓ A not-for-profit organization that specializes in the recruitment of persons with disabilities provided a workshop on inclusive assessment and selection practices to FINTRAC's HR community in September 2023. The one-hour session covered the following topics: introduction to inclusive assessment and selection practices that allow neurodivergent candidates to showcase their knowledge, skills and abilities; tips for creating more inclusive assessments; and, introduction to alternative, competency-based assessment approaches.
- ✓ Two members of the HR team attended the Office of Public Service Accessibility's Accessibility Passport facilitators training in fall 2023. The purpose of the training was to equip future facilitators to be ambassadors of the Passport, deliver information sessions about its implementation in the workplace and ensure consistent messaging across the federal public service. The training was comprised of sessions on the following topics: leading accessible sessions; legislative framework and the Passport; and, common questions and facilitator best practices.

Still to come:

- In December 2023, FINTRAC is starting the implementation of a five-part neurodiversity learning series. The learning series enhances understanding, challenges misconceptions and builds organizational capacity to create inclusive hiring and management practices. Certain sessions will be geared to the leadership community and HR professionals and others will be open to all employees. In December 2023, the first session will cover Inclusive Workplaces.

Theme employee experience

Planned Activity – Accessibility Passport. Create a means by which persons with disabilities can easily communicate their needs with their supervisors.

- Start and end date: December 2022 to March 2026

Accomplishments in 2023:

- ✓ The Accessibility Passport, developed by the Office of Public Service Accessibility with the lens of a social model for disability (rather than medical model), has been adopted across the federal government. FINTRAC will also implement this approach to accommodations with the purpose of facilitating conversations around barriers experienced and sensitizing employees to an increased disability's ownership over the solutions they require to be their most successful selves.

FINTRAC has joined the community of early adopters in order to customize the templates and resources available to the Centre's needs and reality as a small separate agency part of the High Security Organisation community. The ENPD community and the EEDI working group have been consulted and provided important enhancement suggestions that influenced the program and tools design. Other enablers of accommodations (e.g., IT, security) have also been included in the discussions in order to ensure a clear and simple process is established upon the Passport's implementation.

As a result of discussions with the ENPD community, FINTRAC will augment the Accessibility Passport planned activities to provide information to our leaders on strategies to proactively remove barriers for candidates and employees to effectively respond to accommodation needs in a timely and respectful manner.

We have encountered some delays, as such, the implementation and engagement activities for awareness will take place in the new fiscal year.

Planned Activity – Onboarding of New Employees. Ensure active support of employees on their journey of becoming a FINTRAC employee through the introduction of a new Onboarding Buddy model, streamlining communication, ensuring accessible training material and ensuring appropriate occupational health and safety measures are in place.

- Start and end date: April 2023 to March 2025

Accomplishments in 2023:

- ✓ Demands for information from new candidates as they contemplate a career with FINTRAC can be overwhelming and may inadvertently exclude high calibre persons from joining the organization. With this in mind, the Centre took a

hard look at not only what information we ask for, but also how and when we ask for it. The reality is, information is required from candidates and some can be quite complex like the completion of security clearance application. The review of the onboarding process led to significant streamlining of communication material, the consolidation of information required and adjustment to workflow and timing on when information is requested in order to optimize the potential new employees' effort and to ensure they have the right information at the right time to make their final employment opportunity decision.

The onboarding continues once a candidate becomes an employee of the Centre. At this point of the process as well, we have streamlined considerably through the leveraging of the Centre's new HCM. This work resulted in greatly reducing the number of emails a new employee would receive relating to onboarding activities and provides the employee with a central location to find all onboarding relating tasks that must be completed.

Still to come:

- An Onboarding Buddy model will begin its pilot stages with the goal of being fully implemented by March 31, 2025. This new program will pair new hires who self-declare as a Person with a Disability with an experienced equity-seeking employee in order to foster a sense of safety and inclusion from their very first day. At the conclusion of the Pilot, the success of this program will be assessed and may expand to provide a "buddy" to new hires from other employment equity and equity-seeking groups.

The built environment

FINTRAC has offices in four locations including regional offices in Toronto, Montreal and Vancouver and its headquarters in Ottawa. In all of our locations, FINTRAC is a tenant in leased buildings where Public Services and Procurement Canada (PSPC) is responsible to manage lease agreements that includes base-building code requirements.

In recent years, PSPC led negotiations for new lease agreements for both the Toronto and Montreal regional offices where improvements were made to both the physical space and the furnishings to support improved accessibility. Most recently, PSPC led the negotiations for the renewal of the headquarters lease agreement, which also included accessibility improvement due to code changes made in 2020. As a result, there will be accessibility improvements made to most common areas, including kitchens, washrooms and doors over the coming years.

FINTRAC continues to work diligently to ensure that new retrofits to our leased space consider accessibility at the forefront. In addition, as recognized by members of the ENPD, there are needs for white noise and responses to accommodation. Lastly, as part of FINTRAC's recent and continued effort to support the hybrid work model, in this environment of flexibility and of sharing of workspaces, the Return to Office plans include ensuring that sit/stand desks are available in each of the newly formed 'neighbourhood' on floors, and specifically to those employees requiring accommodations.

Progress against planned activities

Theme culture

Planned Activity – Access to Quiet Spaces. Build awareness on purpose and proper use of focus rooms, and implement a monitoring process on its use to ensure accessibility to those who need them.

- Start and end date: December 2022 to March 2023

Accomplishments in 2023:

- ✓ FINTRAC is gradually adapting its current workspace, designed for the traditional assigned seating model, towards using the space in a way that embraces flexibility and adapts to the situational needs based on the task/function being performed. This means that, at any time on a given day, an employee coming onsite may need to access a bigger space to do collaboration type work with colleagues, a quiet

workspace to do more focussed activities, use boardrooms for meetings, or simply a regular workstation.

- ✓ In the spirit of providing an increased number of quiet spaces to conduct quiet work activities, including for those struggling with sensory overload, FINTRAC increased the number of focus rooms (from 19 to 21) available for reservation.
- ✓ In addition, we conducted targeted communication with the Management community to promote the proper use of focus rooms and equal access by all employees.
- ✓ Other communication activities have also taken place, such as Boardroom Etiquette that promotes the use of proper sized rooms for the activity in question to optimize the use of limited space, and updating communication material to ensure clarity on what would be a proper use of a focus room.

Theme build knowledge

Planned Activity – Increase Internal Accessibility Subject Matter Expertise. Conduct an internal review of FINTRAC's built environment to gain a greater understanding, and to identify where accessibility gaps may exist. Engage ENPD members throughout the review process.

- Start and end date: April 2023 to March 2024

Accomplishments in 2023:

- ✓ The work to define the scope and the selection process for the award of a contract is complete. At the time of reporting, FINTRAC was on track for an accessibility subject matter expert to conduct an internal review of FINTRAC's Ottawa office to be completed by March 2024.

Information and communication technologies

The Government of Canada envisions a public service that is a world leader in barrier-free, inclusive workplaces and services. FINTRAC is committed to doing our part in making this vision a reality through planned investments as follows:

- Doing targeted investment using new and emerging digital technologies to add business value, improve operational performance, enhance digital services, and explore new ways to deliver the Centre's mandate.
- Continue to put in place some essential digital foundational elements required for future transformation and creating a better work experience for all FINTRAC employees by building a digital office.
- Implement new agile, product-driven processes and adopting user-centred product delivery approaches for its operational functions.

That spirit of innovation and creativity has pushed FINTRAC towards finding new ways to ensure accessibility for all.

Progress against planned activities

Theme culture

Planned Activity – Accessibility at the Forefront of Standards and Business Processes. Experiment with a newly developed open source web development toolkit that enables the Centre to build highly accessible applications that will improve the accessibility in technology.

- Start and end date: June 2022 to March 2024

Accomplishments in 2023:

- ✓ IMIT has developed a framework that informs all new web applications and development in an effort to ensure consistency and enable highly accessible applications. More specifically, all new development of applications now includes accessibility features. The Framework is designed to continually evolve to ensure new web applications and development benefit from the lessons learned and best practices discovered. While initially slated to be an experiment, the framework is in full use and has already influenced accessibility features in a new application launched in October 2023.

- ✓ Members of the ENPD were engaged to provide their feedback on a new intuitive data search tool developed as one of FINTRAC's priority investments in 2023. The Modular Architecture Reporting Suite (MARS) allows users – including persons with disabilities – to organize data more simply and to understand search results better. The following is what some ENPD members had to say: "MARS presents us with an excellent example of the way technology evolves to serve both a database function and its users in equal measure. Readability, accessibility, and minimalist design have clearly taken priority in MARS' conception, allowing the application to fade into the background, so that analysts can prioritize a clear workflow and focus on the data without distractions".

"MARS demonstrates how procuring and developing software with accessibility in mind, improves the user experience for the wider population, not just people with disabilities".

Some constructive comments on how to improve the MARS was also provided further demonstrating the value of engaging with a broader user community.

- ✓ In addition, FINTRAC added Keyboard Only Accessibility, and continues to follow the Web Content Accessibility Guidelines (WCAG), Mobile-first development practices, color contrast standards, and use of template that allows the reuse of accessible page designs.

Planned Activity – Accessible IMIT Procurement. Develop processes and tools that include accessibility requirements at the forefront of all IMIT procurement activities.

- Start and end date: January 2023 to March 2024

Accomplishments in 2023:

- ✓ Ahead of schedule, IMIT has adapted its procurement business processes to integrate accessibility at the forefront of their acquisitions. In fact, they are on the verge of completing a major multi-million dollar contract to replace archaic/non-accessible software. A key business requirement is to be accessible out-of-the-box or accessible within prescribed timelines. In advancing this work, IMIT took further steps to ensure the continuous adoption of accessible technology as a standard for all IT solutions.

Theme build knowledge

Planned Activity – Increase Internal Accessibility Subject Matter Expertise. IMIT employees will increase their knowledge on accessibility by assessing their respective business processes and tools with an accessibility lens. Where gaps have been identified, they will begin to implement improvements where appropriate.

- Start and end date: April 2023 to March 2024

Accomplishments in 2023:

- ✓ FINTRAC firmly believes that considering accessibility for persons with disabilities at the start of our experimentation with Artificial Intelligence (AI) is not just a legal obligation, but a moral imperative.

At FINTRAC we are committed to ensuring equal access and opportunities for all of our employees, and integrating accessibility into our AI systems is a fundamental part of our values and ethics and never an afterthought. This is important as these are early days in AI development within the Government of Canada and we believe in being positive role models, demonstrating that innovation requires accessibility and is not held back because of it.

With this in mind, AI offers tremendous opportunities when used effectively. At FINTRAC our IMIT team are creating different Personas to gain a deeper understanding of the needs, preferences and behaviours of different user groups. Personas are used to represent various types of users, jobs, or disabilities in order to design with empathy and accessibility from the start. This is how we are leveraging the power of AI to create a series of workflows using different Personas and almost instantaneously assessing the programming codes which identify gaps in accessibility coding, and propose ways to fix problems and address those gaps at the start. Furthermore, we are expanding the use of Personas across the organization to encourage greater use of AI to facilitate day-to-day work.

Still to come:

- (new) The Accessibility Lead plans to use AI to develop an accessible information session on “A Day in the Life of a Person with a Disability” in the coming months. It is our hope to be able to share this information session with others in government to promote the responsible use of AI.

Theme employee experience

Planned Activity – Access to Wireless Peripherals. Wireless peripherals are currently restricted within the Centre as a 'high security organization'. Discussion to be scheduled with the IMIT Security Committee for an open dialogue on what opportunities may exist.

- Start and end date: November 2022 to March 2023

Accomplishments in 2023:

- ✓ Discussions with the IMIT Security Committee has taken place. While accommodations can be made, wireless technology use for IT peripherals such as, keyboards and mouse, introduces new risks to the Centre's ability to protect against external threats. As such, any requests for such accommodations is subject to a rigorous assessment. Going forward, the need for specialized equipment will form part of the Accessibility Passport process.

Communication, other than information and communication technologies

FINTRAC recognizes the importance of corporate communication activities (i.e., written and oral) to influence positive change where persons with disabilities can fully participate as integral members. A primary function of internal communications is to inform employees on our core values, which includes accessibility. We will continue to apply the principles of accessibility, diversity, and inclusive communication when corresponding externally as per the Government of Canada Communications Policy, as well as the Standard on Web Accessibility.

Progress against planned activities

Theme culture

Planned Activity – Communication Tip Sheet. Build on existing knowledge by conducting additional research on best practices in developing accessible written communication. Develop tip sheets on making internal and external products, activities and events accessible.

- Start and end date: December 2022 to December 2023

Accomplishments in 2023:

- ✓ Using tools and communication materials provided by the Office of Public Service Accessibility and other reliable sources, the Centre developed a 'Tip Sheet' that serves as a how-to guide for accessible communication. The document was endorsed by the ENPD and it provides easy-to-read information with links to the original source of information, such as the [Canada Content Style Guide](#), and the Government of Canada's Accessible Communication Information and Services, as well as the [Digital Accessibility Toolkit](#), to name a few. Over time, it is expected that these tips will contribute to the Centre's culture of being inclusive by default.
- ✓ On the occasion of awareness days, such as the International Day of Persons with Disabilities, the Centre launched a series of communications activities with simple 'did you know' facts released at regular intervals over many months. The aim is to draw the attention of employees' to the new 'Tip Sheet' posted on the Centre's intranet, which shows how easy it is to be inclusive in their activities.

The procurement of goods, services and facilities

Accessible procurement is about identifying accessibility barriers and how requirements can be defined to meet the needs of a broad range of end-users. In advancing its accessible procurement efforts, FINTRAC will work closely with PSPC, as the lead on procurement, to support and guide awareness, development of processes and tools and the development of accessible procurement skill sets.

Progress against planned activities

Theme culture

Planned Activity – Increase Client Knowledge. Provide information sessions to clients on what it means to build accessibility into their procurement requirements at the forefront.

- Start and end date: April 2023 to March 2024

Accomplishments in 2023:

- ✓ The Procurement Office developed and launched a Procurement 101 Learning Event campaign with the objective to build capacity and knowledge on basic procurement activities. As part of this campaign, Accessible Procurement is prominent in the learning material thus playing a key role in supporting a shift in culture across the Centre.
- ✓ At the time of reporting six learning events took place and well attended by employees from across the Centre. More specifically, the November and December learning event centred on accessible procurement as part of client engagement efforts.

Still to come:

- (new) Implementation of Accessible Procurement. Ensure Accessibility is considered and included where possible at the forefront of all procurement processes. Integrate the implementation into current forms and standard operating procedures.
 - Start and end date: April 2024 to March 2025

Theme build knowledge

Planned Activity – Increase Internal Accessibility Subject Matter Expertise. Increase the internal knowledge of Procurement Officers through a number of different activities including attending

information sessions, training courses, staying current on policy changes, and leverage best practices where possible.

- Start and end date: April 2023 to March 2024

Accomplishments in 2023:

- ✓ In the interest of building internal capacity and subject matter knowledge, all Procurement Officers were required to register for courses that place greater emphasis on accessible procurement. In doing so, the team was well positioned to work with high procurement users, such as IMIT to ensure accessibility is at the forefront for all acquisitions where applicable.

The design and delivery of programs and services

Unlike many other government departments and agencies, FINTRAC does not offer direct service delivery to Canadians. However, FINTRAC does work closely with two primary stakeholder groups when delivering on its mandate to facilitate the detection, prevention and deterrence of money laundering and the financing of terrorist activities, while ensuring the protection of personal information under our control. FINTRAC's two stakeholder groups are:

1. Provides financial intelligence to police, law enforcement and national security agencies; and
2. Regulates Canadian businesses who are required to report financial transaction, such as banks, casinos, real estate firms, money service providers, etc.

Progress against planned activities

Theme culture

Planned Activity – Consultation with External Stakeholders. FINTRAC will undertake a consultation process with the Centre's two stakeholder groups to assess where accessibility gaps may exist and ensure accessibility is at the forefront of all program and services design of process and tools.

- Start and end date: April 2023 to March 2024

Accomplishments in 2023:

- ✓ The Centre's primary mode of communication with key stakeholders is through data. FINTRAC primarily collects data electronically using prescribed, structured forms. Recently, FINTRAC introduced improvements to common forms used by stakeholders to increase ease of use and intuitiveness for the external partner and auto-ingestion into our systems. With respect to the disclosure of financial intelligence produced by FINTRAC, the formats of these outputs are varied and have been advanced to apply technologies to allow for increased accessibility for employees. To note, some of the improvements were to enhance employee experience and remove known barriers as well.

Through recent consultation with stakeholders, the Accessibility Lead was able to confirm the positive impact these improvements had on a person with disabilities. In fact, this individual could not say enough about how happy they are with the products they receive from the Centre and could not think of other accessibility barriers for FINTRAC to

address. Important to note, enhancement to the forms, in consultation with stakeholders that were implemented months before the published Accessibility Plan, further demonstrates our commitment to accessibility motivated by the desire to do the right thing.

Delayed – Focus of consultation was with one stakeholder group – those who receive financial intelligence from FINTRAC. The Accessibility Lead will continue to work with colleagues from across the Centre to ensure engagement with reporting entities.

Transportation

FINTRAC will actively participate in any activities that will influence and remove transportation barriers for persons with disabilities, if called upon. In the absence of having any transportation responsibilities, such as fleet management, our influence is more about ensuring accessible transportation when organizing events, endorsing events organized by others, or when employees must travel for work.

Progress against planned activities

Theme culture

Planned Activity – Accessibility when Traveling. Consider accessibility at the forefront when planning travel and selecting events that are accessibility friendly.

- Start and end date: April 2023 to June 2023

Accomplishments in 2023:

- ✓ All FINTRAC employee events consider accessibility at the forefront to avoid creating barriers. Meeting invitation for events now include clear messaging to proactively make available close caption where needed.

Still to come:

With the introduction of the Accessibility Passport, employees will be able to identify their accessibility needs to ensure they are factored in when deciding on events and travel.

Planned Activity – External Events Accessibility. Supervisors to ensure persons with disabilities are well supported when attending external events through such measures as assigning a Travel Buddy and providing access to recordings and notes.

- Start and end date: April 2023 to March 2024

Accomplishments in 2023:

Still to come:

With the introduction of the Accessibility Passport, employees will be able to identify their accessibility needs to ensure they are factored in when attending external events.

Consultation with persons with disabilities

The Employee Network for Persons with Disabilities (ENPD) membership consist of volunteers who responded to the call to help 'make a difference to create a barrier-free workplace'. There is representation of persons with physical, cognitive and learning disabilities with a number of different barrier types that hinders their ability to fully and equally participate in society.

FINTRAC's progress on its Accessibility commitments has been influence by the invaluable input received from ENPD members. Over the course of the year, ENPD members met at least four times to solicit input on key commitments as they advanced, such as:

- Request for Proposal to secure a third party service provider to advance inclusive hiring which led to a new contract with Specialisterne.
- Procurement plans and activities to ensure accessibility is considered at the forefront.
- Accessibility week activities and events to ensure intended objectives are met.
- Accessibility passport which lead to meaningful changes that will impact the overall employee experience.
- Communication tools and tips for employees to ensure their relevance and impacfulness,
- Assessment of newly revised IT tools to provide invaluable input on areas where accessibility could be further enhanced.

Feedback

As mentioned previously, unlike many other government departments and agencies, FINTRAC does not offer direct service delivery to Canadians. As well, with our very focussed mandate and high security profile, there are only two stakeholder groups with which the Centre interacts, they are:

1. FINTRAC provides financial intelligence to police, law enforcement and national security agencies. The products we provide to this group is specialized and, in some cases, uses specialized technology.

The engagement with this group was to determine if there are any barriers that could be eliminated that would ensure persons with disabilities are able to work with FINTRAC's product and are able to access information effectively. As well, we solicited any additional feedback on accessibility. From the call-out, one law enforcement agency did agree to a discussion with the Centre. The nature of the feedback provided was more to validate that the work already done by FINTRAC to improve some of our products was meaningful and no additional barriers were identified to date as needing attention. On this, FINTRAC received very positive feedback.

2. FINTRAC regulates Canadian businesses who are required to report financial transactions, including banks, casinos, real estate firms, and money service providers. FINTRAC works with these reporting entities to ensure compliance with legislation and associated regulations, to ensure the Centre receives the required financial transactions reporting that it needs to produce financial intelligence for Canada's police, law enforcement and national security agencies.

While some attempts were made to leverage program centric engagement activities, it was noted that this group of stakeholders continues to be extensively solicited for feedback on significant legislative and regulatory changes that are nearing completion. As such, it was deemed a collective best interest to delay consultation with this group to 2024.

The Centre did not receive any unanimous feedback through the published channels in the last 12 months. Regular monitoring will continue.

FINTRAC continues to engage with the highly effective Employee Network for Persons with Disabilities. The calibre of feedback received has had meaningful impact for all employees. As such, the current schedule of four

meetings per year will remain for the second year of Accessibility Plan implementation.

Annex A – Managing the accessibility program

Governance

The employee network for persons with disabilities

The ENPD has a key role in helping our organization to identify barriers to accessibility, actions we can take to remove these, and validate where we may already be on the right track for continued progress. Valuable input from this ENPD will inform FINTRAC's multi-year accessibility plan renewable every three years.

In addition to being consulted as the plan is developed, the ENPD will be part of the monitoring and reporting process to track progress on actions contained in the accessibility plan to ensure its intended objectives are being met.

For its inaugural year, there will be quarterly touch points with the ENPD to engage in an open dialogue on any new, materializing or existing barriers the Centre should address to meet its targeted barrier-free culture at the Centre. Overtime, it is expected that the frequency of touch points will be adjusted in accordance to the needs but will never be less than two meetings per year – mid-year and year-end.

Employment equity, diversity and inclusion (EEDI)

The EEDI Champion and Working Group are in place to support the Executive Committee (EXCO) in providing leadership in this domain. The Working Group is dedicated to increasing employee awareness, co-developing initiatives, modernizing current programs and policies, and reshaping organizational norms in collaboration with the EEDI Champion who is an EXCO member.

To support the ongoing management of this important Accessibility file with the continuous support from the ENPD, Accessibility is now a regular agenda item on the Centre's high functioning and active EEDI Working Group. This will ensure the continuous alignment with other EEDI initiatives and leverage the power of this working group to advance the Accessibility Plan.

Management advisory committee (MAC)

A senior management level committee, MAC supports EXCO in fulfilling its mandate by providing strategic advice and recommendations on issues, risks and opportunities for the sound management of programs, policies, processes and systems that sustains FINTRAC's business operations, as well as for key investments, priorities and policy development initiatives to advance FINTRAC's change agenda.

MAC will receive regular updates on the progress of the Accessibility Plan and will be called upon to support and address any barriers that may arise through the implementation of the plan. At a minimum, MAC's strategic advice and recommendations will be sought on the content of the Accessibility Plan and its annual progress reports.

Executive committee (EXCO)

EXCO is FINTRAC's most senior level committee and provides strategic vision and direction, establishes strategic priorities, provides oversight and guidance on programs and horizontal activities, and ensures the essential conditions—internal coherence, corporate discipline and accountabilities—are in place to deliver effective results. They are the approving body for the Accessibility Plan and annual progress reports.

Annex B – Distribution of persons with disabilities by occupational group

As reported in the **Employment equity annual report 2022–23**

Employment equity occupational group March 31, 2023	Total employees	FINTRAC representation persons with disabilities		Workforce availability (WFA)	
	Number	Number	Percentage	Number	Percentage
Senior managers, middle and other managers	103	*	*	5	4.7
Professionals	314	20	6.4	28	9.1
Semi-professionals and technicians	12	*	*	1	6.4
Supervisors	6	*	*	2	26.9
Administrative and senior clerical personnel	60	7	11.7	6	9.4
Clerical personnel	10	*	*	1	8.5
Intermediate sales and service personnel	12	*	*	1	10.5

Adapted from Statistics Canada, 2016 Census and 2017 Canadian Survey on Disability for occupational groups used at FINTRAC.

**Data is suppressed to protect confidentiality of information and/or when the representation number was three or less.*