



# “Nothing Without Us”



## FINTRAC's Accessibility Plan 2023-25

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## A Message from the Director and Chief Executive Officer

I am pleased to present FINTRAC's first Accessibility Plan. All Canadians should be able to fully participate in society with barrier-free communities, workplaces and services. The Government of Canada's landmark Accessible Canada Act signals the most significant advance in federal disability rights legislation in over 30 years, and proposes a new model in which persons with disabilities will no longer be relied upon to identify, remove and prevent barriers to accessibility.

Renewing our commitment to accessibility plays an important part in advancing our call to action on anti-racism, equity, and inclusion. Diversity and inclusion are essential to building a modern and high-performing federal public service. Differences are often the source of important and lasting innovation within organizations. However, to fully harness the benefits of our differences, employees need to be comfortable in their work environments without fear of discriminations and have the opportunity to bring their full selves to work in order to be engaged, creative, and productive.

FINTRAC is committed to being a model for accessibility, starting with our foundational pledge on diversity and inclusion that is anchored around our values and ethics. I believe the Centre is capable of embodying accessibility, embracing it as a core value of our corporate culture and leading by example. And, staying true to the slogan "Nothing Without Us," we will implement our plan in partnership with persons with disabilities – no one will be left behind.

In the coming years we will focus on these seven pillars of accessibility: Service and Design Delivery, Built Environment, Employment, Information and Communication Technologies, Communication, Transportation, and Procurement. In addition, our plan is shaped by three key themes:

1. Continue to build on our culture of inclusiveness and diversity through ongoing awareness campaigns.
2. Augment subject matter knowledge in our enabling functions.
3. Carry that same rigour of commitment to accessibility when recruiting employees, to support employees' continued positive work experience and professional growth.

With our new three-year Accessibility Plan, we will ensure that our programs, services and workplaces are fully accessible. Not only is this the

right thing to do, it will allow us to harness the skills and strength of all of our employees as we work to protect Canadians and Canada's economy.

## 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.

### The Accessibility Canada Act and FINTRAC's Culture

The Accessible Canada Act (ACA) was enacted in July 2019, cementing the Government of Canada's commitment to proactively identify, remove, and

prevent barriers to accessibility where Canadians interact with areas under federal jurisdiction, whether they be internal or external to an organization. Through the [ACA](#), federal departments and agencies have been tasked with three important requirements to support accessibility:

- Creating three-year Accessibility Plans that set out how they will identify, remove, and prevent barriers to accessibility in programs and services.
- Publishing annual Progress Reports that describe how organizations are delivering upon their Accessibility Plans.
- Implementing processes to collect, manage, and respond to feedback on accessibility, including Accessibility Plans and Progress Report.

These activities must be undertaken in consultation with persons with disabilities, respecting the principle of "Nothing Without Us".

Through regular consultation and engagement, FINTRAC is ensuring that its activities are directly aligned with the needs and expectations of persons with disabilities. This means continuously engaging persons with lived experience to identify accessibility barriers, shape the work that is being done to address these barriers, and ensure that these efforts are creating positive outcomes. While the [ACA](#) has introduced new requirements for organizations to follow, ensuring that experiences are accessible is more than a legislative obligation that needs to be met; it is simply the right thing to do.

FINTRAC aims to be a leader in accessibility. Accessibility is a fundamental part of our stakeholders and employee experience, and strengthening accessibility across our programs, services, and policies is what we aim to achieve through the Accessibility Plan. FINTRAC's core values are reflected in our Accessibility Plan, which sets out the Centre's approach to addressing accessibility barriers over the next three years - focusing on the seven areas listed in the [ACA](#):

1. Employment
2. The built environment (buildings and public spaces)
3. Information and communication technologies
4. Communication, other than information and communication technologies
5. The procurement of goods, services and facilities
6. The design and delivery of programs and services, and
7. Transportation



In order to continue raising the bar and shift the corporate culture, the Centre recognizes that it needs to monitor results and ensure accountability. It will be doing so through some of the following initiatives:

- Performance Management Agreements – the leadership cadre will be held accountable through concrete objectives in their performance management agreements. All levels of management will be required to report on how they are:
  - Leading efforts to address systemic racism and barriers, including having discussions on racism and discrimination during management/team meetings and enhancing employee awareness;
  - Enabling and promoting communications and learning opportunities to employees related to respect, inclusion and diversity;
  - Enabling and promoting the talent management and recruitment of members of Employment Equity Groups; and
  - Leveraging targeted Employment Equity, Diversity and Inclusion initiatives that aim to reduce barriers and support employee development and growth.

As a small (less than 500 employees) separate agency within the High Security Organizations (HSO) community, we do face some unique and common challenges, but also a tremendous opportunity to capitalize on our small size and agility to break down barriers and mitigate challenges. Through active engagement with our passionate and dynamic workforce and a focus on concrete actions and investments, we expect to see a tangible culture shift and lasting positive impacts.

## Feedback

The Manager of Workplace Experience is the person responsible for receiving feedback on barriers and accessibility at FINTRAC.

To submit your comments, compliments 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](mailto:Accessibility/Accessibilite@fintrac-canafe.gc.ca)
- By telephone: 1-866-346-8722 (toll free)
- TTY (teletypewriter): 1 800-465-7735
- By mail:
  - Manager of Workplace Experience
  - People, Culture and Workplace Sector
  - 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](mailto: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 impacted you, and any recommendations you may have for how barriers can be removed.

Please ensure to include your contact information when submitting your feedback. We will acknowledge receipt of your feedback, unless received anonymously, in the same manner as it was received. We may also contact you to gain a greater understanding of your feedback.

The person designated to receive feedback on behalf of FINTRAC, the Manager of Workplace Experience, will read the information you provide. We 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 comments and requests 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 does maintain 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](mailto:atip-aiprp@fintrac-canafe.gc.ca)

## Consultation

FINTRAC's Accessibility Plan has been influenced by the invaluable input received from our Employee Network for Persons with Disabilities (ENPD).

The ENPD membership consists 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 conducted an initial self-assessment of each of the seven areas of focus: communication, information management and technology, human resources, procurement, programs and services, and transportation. This self-assessment exercise identified gaps in two key areas:

- Increased accessibility knowledge in key functional areas including an understanding of where accessibility gaps exist.
- The consideration of accessibility at the forefront of how we communicate and support our people, how we develop internal technology, and what we purchase.

Two consultation sessions were held with the ENPD members in the fall of 2022. The objective was to review the results of the self-assessment and to engage members in an open discussion. It is through these consultation sessions that members acknowledge that the Centre is doing well on many fronts to address equity, diversity and inclusion as demonstrated through a number of successful programs, such as, employee awareness campaigns, innovative recruitment strategies, inclusive talent management approaches, flexible workspaces, and accessible internet content and technology.

ENPD members provided valuable insight on how to address the gaps identified through the self-assessment. Also, ENPD members identified an additional gap highlighting the importance of continued positive work experience and professional growth.

FINTRAC's consultation was internally focussed recognizing that its employees are its most valuable asset. There are plans to conduct consultation externally in 2023 with the Centre's primary stakeholders - the reporting entities and law enforcement organizations.

## Call to Action

There are three (3) key themes that have emerged from the initial self-assessment and consultation process that have informed FINTRAC'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 considered at the forefront of 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 purchasing of information technology.
- **Build** internal subject matter **knowledge** 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 **employees** from their first day on the job to the continued positive work **experience** and professional growth.

The following are the details plan for each of the seven areas of focus:

### Employment

FINTRAC's 2019-2024 People and Culture Strategy entitled Our Talent, Our Future, consist of six priorities anchored around three strategic pillars:

1. Empowerment and Change
2. Continuous Growth and Modernization
3. Engagement and Collaboration

FINTRAC has realized many key achievements since the introduction of its People and Culture Strategy of which many were recognized by ENPD members as being a key contributor towards a positive work environment and culture. The following are just a few examples of key achievements in the last three years:

- **Empowerment and Change** – We are investing in developing inclusive leadership skills and in establishing a sense of belonging and trust for all employees. FINTRAC expanded the mentorship to employees by including the Mentorship Plus Program, which targets under-represented groups and includes a sponsorship component.
- **Continuous Growth and Modernization** – A pilot with Specialisterne Canada that led to changes in the way FINTRAC recruits and taps into this underutilized talent; expand and diversify our talent

pool; innovate and enhance current recruitment and onboarding; increase team awareness of neurodiversity; build capacity for managing and leveraging a more diverse workforce.

- **Engagement and Collaboration** – A Pledge for executives has been developed outlining the actions, beliefs and commitments of the executive cadre. It acknowledges current equity, diversity and inclusion gaps and will hold senior management accountable to move things forwards in relation to EEDI.

There is much progress to be proud of and, with the support from the ENPD, there is more that we could do together to address the following barriers:

## Planned Activities

### Theme Culture

- 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
- 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 of and continued growth/development of employees with disabilities.
  - Start and end date: December 2022 to March 2025
- 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

### Theme Build Knowledge

- 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

### Theme Employee Experience

- 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
- Onboarding of New Employees. Ensure active support of employees on their journey of becoming a FINTRACer 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

### 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 lead 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 lead the negotiations for the renewal of the headquarters lease agreement, which also includes 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 lease space consider accessibility at the forefront. In addition, as recognized by members of the ENPD, there is sound management and responses to accommodation needs. Lastly, as part of FINTRAC's recent and continued effort to support the Centre's 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 the newly formed 'neighbourhoods' on floors, and to those employees requiring accommodations.

Demonstrated strong results and, with the support from the ESDP, more can be done together to address the following barriers:

## Planned Activities

### Theme Culture

- 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

### Theme Build Knowledge

- Increase Internal Accessibility Subject Matter Expertise. Conduct an internal review of FINTRAC's built environment to gain a greater understand of and identify where accessibility gaps may exist. Engage ENPD members throughout the review process.
  - Start and end date: April 2023 to March 2024

### Theme Employee Experience

- Assessment of the Build Environment Review. Upon completion of the review, assess report content and develop an implementation plan in response to the findings of the report.
  - Start and end date: April 2024 to June 2024

## Information and Communication Technologies

The Government of Canada (GC) 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 by addressing the following barriers:

## Planned Activities

### Theme Culture

- **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
- **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

### Theme Build Knowledge

- **Increase Internal Accessibility Subject Matter Expertise.** Not a barrier per say but it is vital that IMIT employees increase their knowledge on accessibility by assessing their respective business processes and tools with an accessibility lens. Where barriers have been identified, they will begin to implement improvements where appropriate.
  - Start and end date: April 2023 to March 2024

### Theme Employee Experience

- **Access to Wireless Peripherals.** Wireless peripherals are currently restricted within the Centre as a 'high security organization'. Disussion to be schedule with the IMIT Security Committee for an open dialogue on what opportunities may exist.
  - Start and end date: November 2022 to March 2023



## Communication, other than information and communication technologies

We recognize 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 communications when communicating externally as per the Government of Canada Communications Policy as well as the Standard on Web Accessibility. We will address the following barrier:

### Planned Activities

#### Theme Culture

- 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

## 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 to address the following barriers:

### Planned Activities

#### Theme Culture

- 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
- Principles of Accessible Procurement. Assess and review all tools, internal policies and procurement business processes in order

incorporate accessible procurement at the forefront of the procurement process.

- Start and end date: April 2024 to March 2025
- Maintain Tools and Education. Maintain procurement business processes and tools as the policy evolves, and ensure Procurement Officers are up to date on education/training initiatives offered by Central Agencies.
  - Start and end date: April 2025 to March 2026

### Theme Build Knowledge

- 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

### 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. The Centre's two stakeholder groups are:

1. FINTRAC 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.

We will address the following barrier:

### Planned Activities

#### Theme Culture

- Consultation with External Stakeholders. FINTRAC will undertaken 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

## 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. We will address the following barriers:

## Planned Activities

### Theme Culture

- 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
- 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

## 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)

MAC is a Senior Management level committee that 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.