



# ACCESSIBILITY PLAN 2023-2025

## 2023 Progress Report





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ISSN 2818-5277

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Aussi disponible en français sous le titre : **Plan d'accessibilité 2023-2025 : rapport d'étape 2023**

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# General

## About the Financial Consumer Agency of Canada

The mandate of the Financial Consumer Agency of Canada (FCAC, the Agency) is to protect financial consumers by supervising federally regulated financial entities and strengthening the financial literacy of Canadians. As a regulator, FCAC monitors and supervises the compliance of financial institutions, external complaint bodies and payment card network operators with consumer protection measures set out in legislation, public commitments, and codes of conduct. Through research and education, the Agency enhances the financial literacy of Canadians and raises awareness of their rights and responsibilities in their dealings with financial institutions.

FCAC derives its mandate from the *Financial Consumer Agency of Canada Act*, which outlines the Agency's functions, administration, and enforcement powers, and lists the sections of federal laws and regulations under its supervision.

FCAC is an independent agency that reports to Parliament through the Minister of Finance.

## FCAC's obligations under the *Accessible Canada Act*

The *Accessible Canada Act* was enacted on July 11, 2019, and associated regulations came into force in December 2021. The Act's goal is to achieve a Canada without barriers by 2040. Federally regulated entities, including FCAC, were required to proactively identify, remove, and prevent accessibility barriers and publish a 3-year accessibility plan by December 31, 2022. There are 7 priority areas under the Act:

- employment
- built environment
- information and communication technologies
- communications (other than information and communications technologies)
- procurement of goods, services, and facilities
- design and delivery of programs and services
- transportation<sup>1</sup>

The Act also requires organizations to publish annual progress reports on the implementation of their plan and establish a process to obtain feedback on both the plan and accessibility barriers from employees, stakeholders, and members of the public.

## FCAC's context

### External perspective: A leader in reducing barriers to improve financial consumer outcomes

FCAC takes an intersectional approach to fulfilling its mandate, seeking to understand and consider the demographic and socio-economic characteristics, behaviours, motivations, challenges, and communication preferences of Canada's diverse population, with particular attention to vulnerable groups. FCAC's interventions are meant to address the diverse needs of different populations, promoting access to financial products and services, and the reduction of any identified systemic barriers and/or discrimination in the financial sector.

FCAC's research indicates that financial vulnerability affects a wide variety of people, regardless of culture, community, or background. While vulnerability is not limited to certain groups or demographics, systemic barriers have led to certain groups being more likely to face financial vulnerability. Other research has shown that regardless of income, background or education, hardships have increased more for those with lower income, Indigenous Peoples, recent immigrants, and women, due to the disproportionate financial impact of the pandemic and changing economic environment on these groups<sup>2</sup>.

<sup>1</sup> This priority area under the Act does not apply to FCAC and is not addressed in this accessibility plan.

<sup>2</sup> Evidence from FCAC's [Financial Well-being Monitor](#).

## Internal perspective: An agency with a diverse, inclusive, and respectful workforce

FCAC's [2021–2026 Strategic Plan](#) describes how the Agency fulfills its vision to be a leader and innovator in financial consumer protection. The core principles in the Strategic Plan aim to foster an organizational culture that prioritizes the well-being of its team members and the achievement of its consumer protection mandate. The principles of the Agency's "one mandate, one team" approach, coupled with a strong commitment to equity, diversity, inclusion, and bilingualism, are the foundational pieces that will allow the Agency to build a truly diverse workforce and foster a strong sense of belonging for employees.

FCAC has a non-unionized workforce and is subject to the *Public Service Employment Act*. During 2022- 2023, FCAC's staff grew by 15%. As of March 31, 2023, there were 217 employees. FCAC's approach to employment equity continues to include:

- targeted recruitment to enhance representation
- new accommodation and accessibility measures
- Intentional efforts to celebrate diversity and promote an inclusive and respectful workforce

In 2022-2023, FCAC hired 48 new employees, 7 of whom identified as having a disability. As a result, FCAC's representation of persons with disabilities increased to 12.9% and exceeded the workforce availability of 9.1%<sup>3</sup>.

FCAC collects anonymous employee feedback by participating in the Public Service Employee Survey. This survey provides information to support the continuous improvement of people management practices, including several questions related to diversity and inclusion, and the results allow federal organizations to identify their strengths and areas of concern. The survey was last conducted in 2022-2023 and the results were released in spring 2023. 77.1% of employees completed the survey and the results demonstrate high levels of engagement, as well as strong support for diversity, inclusion, and mental health<sup>4</sup>.

FCAC's Equity, Diversity, and Inclusion (EDI) Action Plan and Mental Health and Wellness Action Plan serve as FCAC's roadmaps to foster a culture that values diversity and inclusion and to create a more healthy, respectful, and supportive work environment.

## FCAC's responsible authority on accessibility

The Assistant Commissioner, Corporate Services is FCAC's responsible authority on accessibility.

<sup>3</sup> To determine if persons with disabilities are equitably represented at the Agency, their representation was compared to the 2017 Canadian Survey on Disabilities.

<sup>4</sup> FCAC's Public Service Employee Survey results: [2022 Public Service Employee Survey Results by Theme for Financial Consumer Agency of Canada - Canada.ca](#)



## Contact information

FCAC welcomes your feedback, questions, and suggestions on accessibility at the Agency. You can contact us using any of the ways shown below:

Online: [Accessibility at Financial Consumer Agency of Canada](#)

Telephone (Consumer Services Centre):

- toll free: 1-866-461-3222
- in Ottawa or outside Canada: 613-960-4666

\*Information officers are available Monday to Friday from 8:30 a.m. to 5:00 p.m. Eastern Time.

Teletypewriter TTY (for persons with hearing impairment):

- toll free: 1-866-914-6097
- in Ottawa or outside Canada: 613-947-7771

Video relay service: FCAC welcomes video relay service calls. You do not need to authorize the operator to communicate with FCAC. Visit [Canada VRS](#) to learn more.

Email: [Contact us](#)

Twitter: [@FCACan](#)

YouTube: [FCACan](#)

Facebook: [FB.com/FCACan](#)

Instagram: [fcac\\_can](#)

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To request a copy of this plan in an alternative format, please contact us.

# Consultations

## External consultations

FCAC benefits from the input of a wide array of stakeholders—federally regulated financial entities, consumer advocates, educators and others in the government and the private sector—to inform its work. In 2023, the Agency leveraged several stakeholder engagements as part of its external consultations process to gain valuable insights on accessibility in the financial ecosystem:

- FCAC engaged Statistics Canada to evaluate how results from the Survey on Savings for Persons with Disabilities could contribute to the [National Financial Literacy Strategy](#) (the Strategy) and help the Agency to better understand how it can advance priority 2 of the Strategy: Build and provide for diverse needs.
- A discussion with ABC Life Literacy provided key insights into how best to include Strategy-Aligned Measures from the Strategy's associated Measurement Plan to assess the outcomes of their financial literacy programming for people with diverse abilities.
- FCAC and Prosper Canada engaged in discussions regarding how best to receive Measurement Plan results from partner stakeholder organizations that work with populations with vulnerabilities including persons with disabilities.
- FCAC offered support to Innovation, Science and Economic Development Canada's Office of Consumer Affairs to fund consumer research and review research papers including one from the Canadian Association of the Deaf on "Deaf Accessibility in the Financial Sector", which examined how accessible the big six banks are for deaf Canadians and provided insights into trends and policy implications for basic and open banking access.

FCAC uses the information received from its stakeholder ecosystem to develop and adapt its information, tools, and resources to address the diverse needs of different populations, promote equitable access to financial products and services, and reduce any identified systemic barriers or discrimination in the financial sector.

## Internal consultations

FCAC engaged a third-party expert in the field of EDI to conduct its first employment systems review (ESR) from September 2022 to March 2023.

The comprehensive review began with an examination of relevant FCAC information, including employment equity reports, human resources policies and action plans, and a high-level analysis of representation by designated group, occupational category, external recruitment, and promotions.

Consultations were then conducted with 42 Agency employees over 2 phases:

- The first phase included key stakeholders such as FCAC's Commissioner, Chief Human Resources Officer (CHRO) and members of the HR team.
- Agency employees at all levels who self-identify as equity-seeking group members were engaged during the second phase through group discussions, including one for persons with disabilities, and individual interviews. An "open" group session was also made available to all employees who wished to provide input.

Additionally, FCAC's EDI Champion, Workplace Advisory Committee (WAC), and Senior Advisor responsible for EDI, formed an advisory group for the ESR and met with the consultant to identify whether there are systemic barriers affecting representation or adversely impacting the day-to-day work environment. Although no systemic barriers were identified, the feedback provided insight into the experience of equity-seeking group members, examples of good practices, and opportunities for continued improvement.

These consultations provided one recommendation – that the Agency offer comprehensive, multi-year EDI sensitization and education for all employees. The ESR also determined that FCAC should continue with good practices, such as establishing a working group to develop an EDI Ambassadors program to provide more opportunities for group members to connect and give input on EDI initiatives.

## Feedback

As part of the *Accessible Canada Act* (ACA) and the *Accessible Canada Regulations* (regulations), the Agency was required to develop a process for receiving and dealing with feedback on consumers' experience with accessibility when dealing with FCAC, on the implementation of its accessibility plan or any other matter related to accessibility.

In December 2022, the Agency updated its website to include an [accessibility feedback page](#), offering various options for consumer input. In 2023 the FCAC received a total of 15 feedback submissions:

- Seven submissions were redirected to the Agency's Consumer Services Centre as they pertained to accessibility in the financial sector. The CSC followed-up with these individuals to provide information about their rights and responsibilities when dealing with financial institutions.
- Five submissions lacked sufficient detail to action. FCAC contacted the individuals for additional information, however no responses were received.
- Three of the submissions were unrelated to both FCAC and accessibility and were not actioned.



# Progress update: FCAC's accessibility action plan

This section provides an update on the goals and current state of accessibility at FCAC, broken down by the *Accessible Canada Act's* priority areas. It also reports on the progress made in removing the barriers that were identified in the Agency's 2023–2025 Accessibility Plan.

## Priority area: Employment

### Goal

FCAC attracts, develops, and retains employees by promoting a diverse and inclusive workplace and maintaining employment practices that are accessible and free of barriers.

### Current state

Beyond a duty, the Agency believes that an enabling environment allows everyone to maximize their contributions and potential and supports a high-performing workforce committed to achieving its ambitious vision to be a leader and innovator in financial consumer protection. In 2023, FCAC continued to implement its triennial Equity, Diversity, and Inclusion (EDI) Action Plan to support a strategic and coordinated approach to building both a culture and business ethos where valuing equity, diversity and inclusion is the norm.

In spring 2023, the Agency completed its first employment system review. Beyond meeting an *Employment Equity Act* obligation, its purpose is to conduct an in-depth assessment of all employment systems, policies and practices and includes collecting employee feedback regarding the way these are implemented. The results of the review were positive and recognized FCAC's efforts as no systemic barriers were identified, and feedback showed that overall, equity-seeking group members feel supported, respected, and enjoy their work environment. This review concluded that FCAC has the necessary senior management commitment and a good foundation for continuing to put in place employment equity initiatives to support its goals of a diverse and inclusive workplace.

FCAC's Policy on Accommodation recognizes the duty to ensure the workplace is inclusive (also known as the duty to accommodate) for employees and persons seeking employment. As part of FCAC's 2022-2023 Public Service Employee Survey results, there were several survey questions related to the duty to accommodate. 8% of FCAC respondents indicated having requested a workplace accommodation measure, out of whom 59% had done so because of a disability. Overall, 71% of respondents who requested an accommodation were satisfied with the measures implemented. Moreover, 92% of all respondents indicated that they would feel comfortable requesting an accommodation measure from their immediate supervisor. Also, the Agency's job advertisements and onboarding materials continue to encourage applicants and employees to self-identify and to request any accommodation measures required to participate fully.

Given that FCAC is subject to the *Public Service Employment Act*, its recruitment practices are non-partisan and merit based. The goal is to achieve a workforce that is representative of the diversity, linguistic duality and range of backgrounds and skills of all Canadians. The Agency's human resources advisors regularly promote hiring from Public Service Commission inventories that include candidates who have self-identified as having a disability. As part of the introduction of the new Sub-delegation of Human Resources Authorities Instrument on April 1, 2023, all delegates were required to complete newly developed in-house delegation training, as well as the Inclusive Hiring Practices for a Diverse Workforce course from the Canada School of Public Service. This mandatory training included information on the changes to the *Public Service Employment Act* that aim to strengthen diversity and inclusion and remove or mitigate biases and barriers faced by equity-seeking groups across the public service. Further training related specifically to the changes of the Public Service Employment Act will be rolled out by the end of 2023, highlighting the responsibility to make reasonable efforts to identify, remove or mitigate biases and barriers during the selection process.

FCAC recognizes that celebrating diversity and providing opportunities to learn are pivotal in raising awareness and fostering a healthy, inclusive, and respectful environment. In 2023, the Agency continued to promote EDI initiatives, related national and international events, and awareness campaigns, such as National AccessAbility Week in June, National Disability Employment Awareness Month in October and International Day for Persons with Disabilities in December.

## Progress update on removing employment barriers identified in FCAC's 2023–2025 Accessibility Plan

The Agency posts all job opportunities through the Public Service Commission's online application system, which is the Government of Canada's standard. FCAC's 2023-2025 Accessibility Plan identified a barrier related to the Agency's "Job opportunities at FCAC" webpage, noting that it is confusing because it does not explain that when a user clicks on the link to view current employment opportunities, they will be redirected to the Government of Canada's job portal. This can be particularly challenging for people who are using screen readers.

Action	Timeline	Status
1. Include text on the "Job opportunities at FCAC" webpage that indicates that applicants will be redirected to the "GC Jobs" webpage, where members of the public can search for and apply to jobs at FCAC.	Complete	The "Job opportunities at FCAC" <a href="#">webpage</a> was updated on 15 January 2023.

## Priority area: The built environment

### Goal

FCAC's physical spaces are barrier-free and enable employees and visitors to circulate freely and safely.

### Current state

As part of a workplace modernization project, construction on the Agency's Ottawa office was completed in March 2023 and a new Toronto office was established which will be fully operational in early 2024. The new spaces are designed to maximize accessibility and meet the Canadian Standards Association's built environment standards.

FCAC has an up-to-date emergency procedures manual for its Ottawa office and is developing one for its Toronto location. All new employees are required to read the manual which includes information for persons who need assistance due to a disability and requests that they self-report to the Agency's responsible authorities to ensure that appropriate procedures are in place to assist them during an emergency.

There were no identified barriers in FCAC's built environment due to the Agency's offices being under construction during the development of the accessibility plan. Employees are now occupying the new workspaces and the Agency encourages them and visitors to submit feedback on accessibility barriers that they experience while at FCAC's physical locations.

## Priority areas: Information and communications technology and other communications

### Goal

FCAC's information and communications technology (ICT) products and services are accessible, and its information and resources are easy to understand in an increasingly digital world.

### Current state

All information management and information technology tools implemented at the Agency meet Government of Canada accessibility standards. The Agency's Microsoft 365 platform promotes digital inclusion by offering features such as accessibility checkers and accessible templates. Also, it is compatible with assistive technologies, such as screen readers.

FCAC is committed to ensuring that its communication channels remain as accessible as possible. The Agency's Consumer Services Centre (CSC) performs a vital role in supporting the Agency's consumer protection mandate by providing helpful information directly to financial consumers, merchants, and stakeholders. The CSC can be reached by telephone, email, or mail, or by submitting an online feedback form. The Agency also offers a teletypewriter (TTY) service.

The Agency’s Consumer Digital Products Team supports accessibility by employing a Human-Centered Design process that includes users of all abilities and striving to ensure that all social media images include alternative text (ALT text) and that descriptive transcripts are available for FCAC promotional videos. The Agency continues to regularly review and update its consumer-facing content to ensure it is written in plain language.

## Progress update on removing identified ICT and communications barriers in FCAC’s 2023–2025 Accessibility Plan

FCAC’s 2023-2025 Accessibility Plan identified 4 barriers related to ICT and other communications:

- Although phone, email and webform communication are currently the predominant methods of communication, live chat functions would improve accessibility, particularly for people who have difficulty with hearing and cannot use a phone but would appreciate a quick response.
- The “Code of Conduct when contacting FCAC” webpage outlines expectations for both FCAC and the consumer when the Agency is contacted. While the Code reflects FCAC’s core value of respect, the principles of equity, diversity and inclusion could also be highlighted.
- Some information on FCAC’s website was difficult to understand. Navigating Canada’s financial landscape is a challenge for many people due to the growing complexity of financial products and services, the number of choices and providers, and the digitalization of finance. While these aspects may pose barriers for many Canadians, they can be particularly challenging for some people with disabilities, especially those with cognitive, learning, or intellectual disabilities.
- Some social media posts use alternative text inconsistently. Alternative text is meant to explain in words what the picture is as well as any information contained within it. People who have vision-related disabilities may rely on screen readers to describe digital content.

Action	Timeline	Status
1. Update FCAC’s “Code of Conduct when contacting FCAC” webpage to mention people with disabilities and accessible communication practices.	Complete	The “Code of Conduct when contacting FCAC” <a href="#">webpage</a> now includes a section on accessibility and a link to an accessibility feedback web form.
2. Explore adding a live chat option to FCAC’s website.	End 2024	In 2024, FCAC will research and explore options to introduce a live chat option.
3. Explore conducting user testing of FCAC’s consumer-directed information to identify accessibility barriers.	Ongoing	In 2024, FCAC will research and explore user testing on FCAC’s consumer directed information.
4. Review FCAC’s consumer-directed information and apply plain language principles.	Ongoing	FCAC’s content follows Canada.ca style guide which includes plain language and web content accessibility guidelines. A yearly review is conducted to improve efficiency, clarity, and compliance with quantifiable metrics (long sentences, passive voice, readability, and grade 8 reading levels).
5. Ensure that all social media posts are accessible and consistent with the use of alternative or descriptive text.	Ongoing	All FCAC social media images and videos are regularly reviewed to ensure they include alternative text (ALT text), or descriptive transcripts are included on videos as captions when/if the platform does not support adding ALT text.

## Priority area: Procurement

### Goal

FCAC's procurement practices include accessibility considerations.

### Current state

FCAC's current process for buying products and services continues to adhere to the Government of Canada's Directive on the Management of Procurement. The Agency purchases information technology equipment through Shared Services Canada or Public Services and Procurement Canada, both of which have accessibility standards.

There were no identified barriers in FCAC's 2023–2025 Accessibility Plan related to procurement. FCAC will continue to follow the Government of Canada's Directive on the Management of Procurement's process for buying products and services.

## Priority area: Programs and services

### Goal

Reduce barriers in the financial ecosystem that limit or hinder people with disabilities from accessing, understanding, and using appropriate financial products, services, and education to their benefit.

### Current state

Insights from research and behavioural science are key to providing evidence-based, trustworthy, and practical information for financial consumers. FCAC develops and adapts its information, tools, and resources to address the diverse needs of different populations, promote equitable access to financial products and services, and reduce any identified systemic barriers or discrimination in the financial sector.

The National Financial Literacy Strategy continues to aim at helping Canadians achieve financial resilience by creating a financial ecosystem that is accessible, inclusive, and effective for everyone. The Strategy is underpinned by evidence-based research and collaboration among various stakeholders in the financial ecosystem

The Strategy identifies six priority areas to reduce barriers and motivate consumers to take positive financial actions, recognizing the need for inclusivity and accessibility for all Canadians, especially those who face compounded barriers due to intersecting identities (e.g., women, Indigenous Peoples, persons with disabilities and members of visible minorities). Recognizing these intersections can ensure inclusive strategies that consider diverse perspectives are incorporated in planning and implementing programs and processes and measuring impact. Progress measures for the Strategy's target outcomes and consumer building blocks were established through the Measurement Plan.

Evidence from the [Monthly Financial Well-being Monitor](#) (formerly the COVID-19 Financial Well-being Survey) found that the pandemic and the changing economic environment had negative impacts on many Canadians' finances, especially those who faced barriers or belonged to vulnerable groups, and that it changed their financial behaviours and choices. This survey continues to be conducted monthly, and the result of this research continues to inform perspectives on accessibility and equity, diversity, and inclusion in developing the Agency's internal policies and work practices, and in decision-making.

## Update on identified barriers in FCAC's Accessibility Plan

Canadian financial consumers who experience problems with federally regulated financial institutions (that is banks and federally regulated trust, loan, and insurance companies) have the right to make complaints. FCAC's Accessibility Plan noted that the complaint-handling process could be confusing and difficult to understand. The information on complaint handling is contained on different web pages, so it requires readers to click on several links. Also, the steps to file a complaint are unclear, and the amount of work that a person is required to do to submit a complaint is onerous and may discourage some people with disabilities from filing.

Action	Timeline	Status
1. Review FCAC's educational material on the complaint process for accessibility and ease of understanding and develop a plan to address any barriers that are identified.	Complete	FCAC's consumer facing webpages for the Financial Consumer Protection Framework and all FCAC complaint webpages were reviewed and updated using the Canada.ca style guide. Moving forward, the webpages will be reviewed periodically as part of the Agency's continuous improvement process.

## Measures to prevent accessibility barriers

FCAC is committed to advancing accessibility through continuous monitoring and oversight. FCAC's Equity, Diversity and Inclusion Action Plan continues to provide a concrete roadmap to chart progress and measure results, while ensuring that the Agency continues to consult with designated group members and equity-seeking groups, including persons with disabilities. The roadmap will enable the Agency to detect and proactively address emerging issues that may produce new accessibility barriers.

FCAC's prevention measures remain focused on four broad areas:

1. **Physical accessibility:** Ensuring FCAC's Ottawa and Toronto office spaces continue to meet the Canada Standards Association's built environment standards and promptly addressing issues identified by employees and visitors while at FCAC's physical locations.
2. **Organizational policies, practices, and decision-making processes:** Considering accessibility and equity, diversity, and inclusion perspectives in developing the Agency's internal policies and work practices, and in decision-making.
3. **Organizational culture:** Fostering a culture that minimizes attitudinal barriers such as discrimination, stereotyping, and stigma, by continuing to increase awareness, understanding, and knowledge of diversity and inclusion issues at all levels of the organization. This can be achieved by promoting events from the equity, diversity, and inclusion commemorative calendar, organizing learning activities and continuing to strengthen the use of equity, diversity and inclusion strategies in recruitment and staffing processes.
4. **Future activity amongst supervisory, research and education programs as part FCAC's financial consumer protection mandate:** The Agency will continue to apply an equity, diversity, and inclusion lens in the execution of its mandate, including:
  - Continuing to identify and understand the diverse needs of target population groups, such as persons with disabilities, through data collection and research.
  - Implementing the National Financial Literacy Strategy 2021–2026 through:
    - Collaborating and engaging with community-based organizations serving diverse audiences to validate research findings, understand needs, and develop user-tested resources to better serve their audiences.
    - Reflecting the needs of diverse demographics, such as persons with disabilities, in the development of consumer information, programs, and experimental interventions.
  - Engaging and collaborating with other government departments, external partners, and industry to contribute to research and policy analysis of systemic inequities in the financial sector.
  - Leveraging ongoing research to inform the supervision of financial consumer protection obligations, considering the potential implications for diverse population groups.

These prevention measures will continue to sustain the Agency's high-performing workforce and help to ensure that its employees, persons seeking employment with FCAC, and visitors to its physical premises are treated with dignity and respect in an inclusive, barrier-free environment. Also, these sustained efforts will create a more accessible, inclusive, and effective financial ecosystem that supports diverse Canadians in meaningful ways.