



Parole Board
of Canada

Commission des libérations
conditionnelles du Canada

2023-2025 Accessibility Plan

Parole Board of Canada

December 2022



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From the Chairperson

As Chairperson of the Parole Board of Canada (PBC or the Board), I am pleased to present the PBC's 2023-2025 Accessibility Plan. The Board is committed to building a culture of inclusiveness for the public that use PBC services, for PBC employees and Board members. The Board will work to ensure that anyone can access its programs and services with independence and dignity.

This plan describes the measures the PBC will undertake to remove and prevent barriers to individuals with disabilities. The goals outlined in the plan address identified gaps pertaining to accessibility and establish commitments towards making the PBC more accessible over the next three years. I, and the leadership team of the PBC, are committed to achieving these goals.

Accessibility is everyone's responsibility. It will take the support and commitment from all levels of the organization to transform the PBC into a truly accessible organization. Embracing diversity and inclusion is our pledge to you.

Jennifer Oades

Chairperson, Parole Board of Canada



1. General

1.1 About the PBC

The PBC is an independent administrative tribunal that, as part of the Canadian criminal justice system, makes independent, quality conditional release (parole) decisions, record suspension/pardons and expungement decisions, as well as clemency recommendations, in a transparent and accountable manner, while respecting diversity and the rights of offenders and victims.

The PBC has exclusive authority under the *Corrections and Conditional Release Act* to grant, deny, cancel, terminate or revoke day parole, full parole, and authorize or approve temporary absences. The PBC may also order offenders who have reached their statutory release date to be held in prison until the end of their sentence, upon referral by the Correctional Service of Canada (CSC). The PBC also makes parole decisions for offenders serving sentences of less than two years in all provinces and territories except Ontario, Quebec and Alberta, which have their own parole boards.

The PBC also has legislated responsibilities to:

- order, refuse to order and revoke record suspensions under the *Criminal Records Act*.
- order or refuse to order expungement of a conviction under the *Expungement of Historically Unjust Convictions Act* (Expungement Act).
- make recommendations for the exercise of clemency through the Royal Prerogative of Mercy.

The PBC is headed by a Chairperson who reports to Parliament through the Minister of Public Safety.

For more information on the PBC's programs and services, visit Canada.ca/Parole-Board-of-Canada.



1.2 Statement of Commitment

The PBC is dedicated to ensuring that persons with disabilities have equitable access across its organization. The PBC recognizes that improving accessibility is an ongoing commitment that requires acknowledging the experiences of persons with disabilities and taking action to remove barriers in a timely manner.

It is important that everyone who uses the PBC services is able to do so fairly and equitably. The PBC wants everyone who interacts with the Board to be able to do so with dignity, independence and without barriers. This plan is a commitment to listening to persons with disabilities and improving accessibility within the organization.

1.3 Feedback Process & Contact Information

As a means to capture and respond to accessibility feedback, especially from persons with disabilities, the PBC has established a feedback process (described below). Individuals may choose to submit the feedback anonymously. The PBC welcomes feedback, such as comments, concerns or questions, on accessibility from members of the public, partners, stakeholders, as well as its employees and Board members.

All feedback received will be reviewed and responded to, as appropriate. It will be catalogued and incorporated into the PBC's annual progress reports.

Our **Designated Official for Accessibility**, responsible for receiving feedback and enquiries about accessibility is the Senior Advisor, Values, Integrity and Disclosure. Feedback about accessibility barriers at the PBC or about the implementation of this plan, as well as requests for alternative formats of this plan or the feedback process, can be sent to the Designated Official for Accessibility through any of the various methods listed below.

Methods to submit feedback

Online Form: You may use the feedback form on the [Contact the PBC](#) webpage.



Email address: Accessibility.Accessibilite@pbc-clcc.gc.ca

Phone number: 1-833-541-3063 (toll-free)

Teletypewriter (TTY): (613) 954-7771

Mailing address:

Designated Official for Accessibility
Parole Board of Canada
410 Laurier Avenue West, 6th floor mailroom
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Alternative Formats

Alternative formats of this plan and a description of the PBC's feedback process are available by contacting the **PBC Designated Official for Accessibility** as follows:

Email address: Accessibility.Accessibilite@pbc-clcc.gc.ca

Phone number: 1-833-541-3063 (toll-free)

Teletypewriter (TTY): (613) 954-7771

Mailing address:

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A web version of this plan is available at: [PBC Accessibility Plan 2023-2025 - Canada.ca](#).



The following alternative formats are available upon request and will be provided within 15 business days of the initial request:

- Print;
- Large print (18 pt).

The following alternative formats are available upon request and will be provided within 45 business days of the initial request:

- Braille (a system of raised dots that people who are blind or who have low vision can read with their fingers);
- Audio (a recording of someone reading the text out loud).

1.4 Definitions

The following definitions apply throughout this plan:

Accessibility: The design of products, devices, services, environments, technologies, policies and rules in a way that allows all people, including persons with a variety of disabilities, to access them.

Barrier: Anything — including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice — that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.

Disability: Any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.



2. Areas Described under Section 5 of the *Accessible Canada Act (ACA)*

2.1 Organization Wide Initiatives

Overview

In launching the PBC's accessibility initiative, a project team was assembled and comprised of employees from across the organization. This team was responsible to evaluate the PBC's current level of accessibility, help identify gaps in accessibility and create goals to address identified gaps. Moving forward, a steering committee will be established to support the implementation of the plan and to track its progress.

The Team consulted with a variety of accessibility stakeholders. PBC employees and Board members were surveyed to identify barriers within the PBC related to each [Accessible Canada Act \(ACA\)](#) area. Further information about PBC's accessibility was gathered through an external public survey from various stakeholders including those with a disability and those interested in accessibility issues. The results of these surveys have informed the creation of this plan. A baseline of accessibility for the PBC was established and progress will be reported annually.

Accessibility Barriers and Corrective Actions

Barrier

- There is no ongoing method of consulting people with disabilities.

Actions to correct this barrier

- Future surveys and questionnaires seeking feedback about the PBC will include questions on accessibility.
- By the end of 2023, the PBC will establish an external Accessibility Advisory Committee as a commitment to consult with persons with disabilities.



2.2 The Design and Delivery of Programs and Services

Overview

The PBC holds parole hearings and file reviews and makes quality independent decisions. The Board also holds culturally-adapted hearings for Indigenous offenders, such as Elder-Assisted and Community-Assisted hearings, and recently introduced cultural hearings for Black offenders.

The PBC also makes record suspension and expungement decisions as well as clemency recommendations to the Minister of Public Safety.

The Board provides information to victims of crime about the conditional release process. Victims are able to access information and services through the [Victims Portal](#). Support is provided to victims to prepare and present statements during the decision-making process.

The PBC conducts outreach sessions in the community and in-reach sessions in correctional institutions providing information about the Board's public safety mandate.

Individuals accessing the Board's services may face challenges in requesting disability-related accommodations such as alternate formats for forms, assistance filling out forms and understanding the technical language used in conditional release.

Accessibility Barriers and Corrective Actions

Barrier

- There is no process for requesting and receiving accommodations for people who interact with the PBC.

Actions to correct this barrier

- By the end of 2023, the PBC will develop a webpage with information on accessibility at the PBC.
- As of 2024, PBC employees and Board members who have direct contact with the public will receive ongoing training on providing accessible services.



- By the end of 2024, the PBC will identify specific staff members who will arrange accommodations for people who interact with the PBC.

Barrier

- PBC does not communicate directly with offenders' legal counsel and assistants which is creating barriers for offenders with cognitive disabilities.

Action to correct this barrier

- By the end of 2024, the PBC will review its practices on communicating with offenders' assistants.

Barrier

- Hearing processes can be complicated and confusing for offenders who have cognitive disabilities.

Action to correct this barrier

- By the end of 2025, the PBC will review procedures and policies related to hearings to improve their accessibility.

2.3 Employment

Overview

The PBC has approximately 493 employees and Board members working across the country in five regions and one national office. The work is largely office-based with some travel required for hearings and meetings. Currently, PBC employees and Board Members are working in a hybrid model with a balance between working from PBC offices, working remotely from home, and from correctional institutions. PBC Board members conduct hearings and review case files to make conditional release decisions for offenders. The rest of the work of the PBC is predominately administrative, such as processing applications for record suspension and clemency, as well as other government functions like corporate services, finance, communications and policy.

By law, the PBC requires that Board members be sufficiently diverse in their backgrounds to represent community values and views. Over the past several years,



the Government has made great efforts to recruit Board member candidates from diverse communities to better reflect the Canadian population. By 2025, the Board will continue to improve the level of representation of its employees with disabilities and to provide the government with an increased slate of Board member candidates with disabilities.

Recently, the PBC also launched an Employment Equity Plan to support its efforts to become more representative of the population it serves and to create an inclusive, healthy workplace free of discrimination and barriers to employment and career development.

As a means to improve its workplace culture around disability and accessibility, the PBC invited persons with a disability to speak about their lived experiences to employees and Board members and will continue to hold these types of events.

Accessibility Barriers and Corrective Actions

Barrier

- The process of requesting and receiving accommodations for employees is unclear, long and requires many levels of approvals.

Actions to correct this barrier

- By the end of 2023, the PBC will complete a review of its workplace accommodation process in consultation with employees and Board members with disabilities, including an examination of barriers and challenges as well as ways to simplify the process.
- Beginning in 2024, the PBC will centralize funding for workplace accommodation requests.
- By the end of 2024, the PBC will:
 - Implement the use of [GC Workplace Accessibility Passports](#).



- Ensure that all staff and Board members with supervisory duties receive ongoing training on workplace accommodation and the legal duty to accommodate employees and Board members.
- By the end of 2025, the PBC will implement changes to its workplace accommodation process based on the results of the review. The goals for these changes will be to:
 - a. make the process as easy as possible for employees and Board members; and
 - b. shorten wait times for receiving accommodation.

Barrier

- Employment Equity data indicates a gap in representation of employees with disabilities.

Actions to correct this barrier

- By the beginning of 2023, the PBC will add a statement to its Job Opportunities page encouraging persons with disabilities to apply.
- By the end of 2023, the PBC will:
 - ensure all employees and Board members know how to self-disclose if they have a disability. The organization will also ensure that disclosures are confidential.
 - undertake an employment system review to identify barriers to employment for persons with disabilities.
- By 2025, the PBC will reduce its representation gap and hire more employees with disabilities.

Barrier

- People with disabilities feel they do not have the same opportunity for advancement as non-disabled peers.

Actions to correct this barrier



- By the end of 2023, the PBC will aim to include diverse members within selection boards for employee staffing processes, including individuals with disabilities.
- By the end of 2024, the PBC will review merit criteria to identify any barriers to promotions for employees with disabilities.

Barrier

- There may be limited awareness among employees, managers and Board members concerning disability and accommodations.

Actions to correct this barrier

- Starting immediately:
 - The PBC will invite a greater number of guest speakers to discuss disabilities with employees and Board members as part of disability sensitivity training.
 - Leadership will continue to commit to improving accessibility across the organization through practical actions.
- As of 2023, the PBC will hold ongoing consultations with its Network of Persons with a Disability, which is a resource group within the organization made up of employees and Board members with disabilities, with the end goal of developing a plan by 2025 for better incorporating accessibility issues within its corporate culture.
- By the end of 2025:
 - The PBC will provide staff and Board members in a supervisory role with the tools and resources they need to enhance support to employees and Board members with disabilities.
 - All individuals in a supervisory role will receive mandatory initial training and ongoing training on supporting employees and Board members with disabilities and on the Board's duty to accommodate.



2.4 Information and Communication Technologies

Overview

The PBC uses a variety of Government of Canada technologies to communicate with partners, stakeholders and members of the public to ensure they can access information about its programs and services. The PBC also uses specialized technology and applications for specific program functions such as processing record suspension applications, working with victims as well as working with offenders.

Internally, the PBC uses an Intranet site to share information and documents among employees and Board members.

For parole hearings that are not held in-person, virtual technology is in place to allow individuals to participate remotely. Hybrid hearings ensure equal participation of those attending hearings in person and virtually.

Accessibility Barriers and Corrective Actions

Barrier

- Internal applications tools and PBC's intranet have not been assessed for accessibility and therefore may present barriers.

Actions to correct this barrier

- By the end of 2024, the PBC will:
 - Promote awareness of digital accessibility standards and provide training for Information Technology (IT) staff.
 - Embed accessibility requirements in all internal development processes to ensure all **new** applications meet Web Content Accessibility Guidelines (WCAG) accessibility compliance standards.
- By the end of 2025, the PBC will:
 - Review end-user-accessible equipment and software and develop plans to remove barriers.



- Review its Intranet site for compliance to WCAG and develop plans to remove barriers.
- Review all in-house applications for compliance to WCAG and develop plans to address gaps.

2.5 Communication, other than Information and Communication Technologies

Overview

The PBC communicates with partners, stakeholders and members of the public through various formats such as email, mail, pamphlets, telephone as well as through its website. Individuals are able to use the Board's various services, which include applying for a record suspension, appealing a decision, and accessing victim information, among others.

The PBC holds hearings, both virtually and in-person, where Board members make conditional release decisions for federal offenders and for provincial offenders where no provincial board exists. The Board members must write the reasons for their decisions, which are held in a registry. The [Decision Registry](#) is a collection of decisions, which are accessible by a written request to anyone who is interested in a specific case.

In terms of plain language, the PBC follows the Government of Canada guidelines and best practices to ensure that the information it provides is easy to understand for the public. Because of the legal nature of its work, the PBC recognizes that some of the language it uses can make understanding information more difficult for members of the public, including some persons with disabilities.

Accessibility Barriers and Corrective Actions

Barrier

- There is no established process for the public to request and receive forms and documents in alternate formats.



Action to correct this barrier

- By the end of 2024, the PBC will create, implement and promote a process to provide specific documents on its website in alternate formats, upon request.

Barrier

- Most PDF forms on the website are not accessible and cannot be completed on a device other than a computer.

Action to correct this barrier

- By the end of 2025, the PBC will collaborate with CSC, which is responsible for the technical aspects of PBC forms, to develop a plan to ensure forms are accessible - prioritizing new forms and those that are used most often.

Barrier

- Documents and forms are often written in complex language.

Actions

- By the end of 2024, the PBC will:
 - Develop internal guidelines on the use of plain language for all written communications. These internal guidelines, based on Government of Canada standards, will set plain language expectations at PBC, including when they will and will not apply.
 - Continue to strengthen Board members' training and associated decision-writing tools to further promote the use of plain language.
- By the end of 2025, the PBC will review existing documents that communicate information about its processes to identify priorities for plain language edits.

Barrier

- Record suspension decisions and clemency recommendations are sent to offenders in paper format only.

Action to correct this barrier

- By the end of 2025, the PBC aims to develop a new case management Pardons and Record Suspension System (PARSS) that will provide decisions and other correspondence in alternate formats.

2.6 The Built Environment

Overview

The PBC's national office is located in Ottawa (Ontario). There are regional offices in: Moncton (New Brunswick), Montreal (Quebec), Kingston (Ontario), Saskatoon (Saskatchewan), Edmonton (Alberta), and Abbotsford (British Columbia). The PBC leases space in some office buildings, and other locations are located in Crown-owned buildings. In all cases, the PBC does not own any of the buildings where employees and Board members work. This means that the PBC is able to address accessibility within the perimeters of its office spaces located within these buildings but not with respect to the physical aspect of the buildings outside of its control, such as entrances, ramps, and some bathrooms, etc.

In-person parole hearings are held in CSC institutions across the country. These facilities fall under the jurisdiction of CSC, and therefore, the PBC has limited ability to address accessibility within the confines of hearing rooms and parole hearing format, but not with respect to the facility's physical aspects.

The PBC carried out accessibility barrier assessments in each of its national and regional offices (excluding the Atlantic Region due to a scheduled move). The results of the assessments revealed that some of the washrooms need accessibility upgrades. Some main entrances and office entrances can be challenging to use for persons with mobility disabilities and could be improved by automatic door openers. It was also recommended that more tactile signage and wayfinding be added in its offices. The PBC is committed to addressing the results of the assessment and improving the built environment where it can. Any findings in the PBC assessment reports that pertain to



areas of the building that fall outside of PBC's control will be shared with the responsible federal department, for their consideration.

Accessibility Barriers and Corrective Actions

Barrier

- There are no clear emergency evacuation guidelines specific to persons with disabilities.

Actions to correct this barrier

- By the end of 2023, each PBC office will circulate its evacuation plans to all employees and Board members.
- By the end of 2024, the PBC will:
 - Develop a process to allow employees and Board members to request individualized emergency plans, as required.
 - Revisit its evacuation plans to take hybrid work into account.

Barrier

- Barriers within the physical environment of PBC's offices have been identified in former accessibility audits.

Actions to correct this barrier

- By the end of 2024, the PBC will address any high priority physical barriers identified in its offices.
- By the end of 2025, the PBC will have a plan to remove lower priority physical barriers identified in its offices.

Barrier

- The open-concept design of the office space with no assigned workstations is posing barriers to some people with disabilities.

Action to correct this barrier



- By the end of 2025, the PBC will identify quiet workspace options in all of its office locations. The PBC will let employees and Board members know that they can use these spaces if they need a break from the noise and activity of the open-plan office.

2.7 Transportation

Overview

The PBC regional offices maintain a fleet of government motor vehicles (i.e. fleet vehicles) for business travel. The Board is in the process of purchasing new vehicles that will provide appropriate space to store mobility aids. Currently, those who need to travel but are unable to use PBC's fleet vehicles due to mobility disabilities can use their own vehicle. However, in some cases, requesting to use their own vehicle can be complicated by the approval process.

Accessibility Barriers and Corrective Actions

Barrier

- Vehicles used by PBC are not accessible for people with mobility disabilities and getting permission to use one's own vehicle presents some challenges.

Action to correct this barrier

- By the end of 2024, the PBC will have a plan to make it easier for persons with disabilities who need an adapted vehicle to make a request to use their own vehicle when travelling for work, in accordance with the [National Joint Council \(NJC\) Travel Directive](#).

2.8 The Procurement of Goods, Services and Facilities

After careful review of our policies, practices, programs and services, including the consultation with persons with a disability, no barriers in the area of procurement of goods, services and facilities were identified at this time. The Board currently follows Public Services and Procurement Canada standards and guidelines and make



accessibility considerations in its procurement processes. We will continue to analyze all policies, practices, programs and services with regard to the procurement of goods, services and facilities on an ongoing basis, to make sure we address and prevent any new or potential barriers in this area.

3. Consultations

To develop this plan, the PBC identified barriers to accessibility within its organization by surveying employees, Board members and stakeholders with disabilities. The comments received informed the actions of this accessibility plan.

Initially, the organization sent a survey to all employees and Board members to ask what barriers they encountered at the PBC. The survey also asked for suggestions on how to improve accessibility within the organization. Issues raised included:

- Open office spaces make it hard to concentrate for persons who are neurodivergent.
- It can take a long time and many steps to receive a workplace accommodation.
- The need for workplace accommodations is sometimes misunderstood by managers.

The PBC also developed a survey for external stakeholders who have disabilities or who represented persons with disabilities. They were asked what barriers they encountered when interacting with the PBC and how it could improve accessibility. The main themes the Board heard from stakeholders were:

- The process of applying for record suspension can be difficult for those with cognitive or learning disabilities.
- The PBC does not communicate directly with assistants of offenders; this is creating barriers for offenders with cognitive/learning disabilities who rely on assistants to apply for parole.



The PBC held consultations during the development of this plan to ensure it is easy to understand and reflects its commitments to accessibility. PBC consulted with two groups of persons with disabilities. The first was a focus group of persons with a variety of disabilities from across Canada. The second was the Network for Persons with a Disability, which is an employee and Board member resource group within the organization. Both groups were presented with a draft of the PBC's accessibility plan and provided comments in round-table discussions. The comments received were incorporated into the final version of this plan.

4. Conclusion

The Parole Board of Canada looks forward to making its organization more inclusive where every individual can interact with the Board without barriers.

The Board will work diligently to complete the actions listed in the plan to address existing gaps and remove barriers that impede the equal and full participation of persons with disabilities.

The Board will continue to engage with and listen to persons with disabilities and will build on the accessibility work it has accomplished to date. This will ensure that the PBC is an accessible and inclusive organization for both its employees and Board members and for the public who use its programs and services.

