

# **Submission on the OPS Multi-Year Accessibility Plan (MYAP)**

**January 2022**

## **Introduction**

The purpose of this submission is to provide the OPS employer with recommendations for the 2022 – 2027 OPS Multi-Year Accessibility Plan (MYAP) that would enable the OPS employer to make the OPS a more inclusive and respectful workplace for employees with disabilities. As such, these recommendations will focus on accessibility standards and requirements that relate to OPS employment.

These recommendations were informed by feedback from the AMAPCEO Disability Caucus, workplace representatives and AMAPCEO members with disabilities.

These recommendations complement AMAPCEO's prior submissions to the OPS employer on diversity, accessibility, inclusion and respectful (DAIR) workplaces initiatives, such as the AMAPCEO Submission to the OPS Inclusive Workplace Policy and Program Review (November 2020).

## The Current State

AMAPCEO acknowledges that the OPS employer has taken important steps to reduce barriers for employees with disabilities. These include:

- Mandatory training for all OPS managers on their duty to accommodate employees with disabilities
- Collecting comprehensive information about the demographics and experiences of employees with disabilities in the OPS Employee Experience Survey, including recruitment, accommodation, and discrimination
- Embedding accessibility principles in the design of new OPS workplaces
- Supporting learning and development for employees with disabilities through the Diversity Career Champions Program
- Wide range of resources and learning opportunities to help OPS employees create accessible communication materials and documents

However, the OPS has much more work to do to ensure persons with disabilities are able to participate fully and meaningfully as OPS employees.

Members of AMAPCEO's Disability Caucus shared the following observations on where the OPS is falling short:

- Many managers do not appear to understand the principles of the duty to accommodate and their responsibilities under the OPS Disability Accommodation Policy, despite mandatory disability accommodation training.
- The disability accommodation process is adversarial instead of supportive: Employees with disabilities report being treated with disbelief and experiencing distress and trauma when seeking accommodation.

- Public commitments of support for employees with disabilities, in particular employees with mental health disabilities, are hollow: they are not followed up with concrete organizational and personal action to create actual change

A clear theme arose from the Disability Caucus consultations: accessibility is not prioritized as a core value of the OPS. Instead, the OPS' approach to accessibility is frequently reactive and not proactive. Within many areas of the OPS, accessibility is something that happens only if it is absolutely required, an employee makes a special request, or if there is enough time or resources leftover once deliverables are achieved. The OPS must take stronger action to ensure accessibility is valued at every level as a core component of OPS work.

The Disability Caucus also reported that the COVID-19 pandemic and the shift to remote work has heavily impacted employees with disabilities. Members also report increased workloads, time pressures and work-related stress due to the COVID-19 pandemic and the hiring freeze. As a result, employees' accommodation needs are changing and, in some instances, increasing.

## **Developing an Integrated and Holistic Approach to Building an Accessible OPS**

The Multi-Year Accessibility Plan is a critical tool for improving accessibility within the OPS, but it is just one component in a broader framework of workplace inclusion policies and programs that address workplace accessibility. Recently the OPS employer completed the *Ontario Public Service Third Party Review of Inclusive Workplace Policies and Programs* and is now developing a plan to implement the resulting Leadership Pledge and recommendations. The MYAP, workplace inclusion policies, and Leadership Pledge all share the same goal of making the OPS a diverse, accessible, inclusive, and respectful workplace for all employees. However, it is not clear how they intersect and complement each other, or where they may potentially contradict each other.

AMAPCEO recommends that the OPS employer conduct an analysis of accessibility policies to ensure the policies are harmonious. AMAPCEO also recommends that the OPS employer develop an integrated diversity, accessibility, inclusion and respectful workplaces strategy that incorporates the 2022 – 2027 MYAP and clearly outlines how the MYAP intersects and interacts with other DAIR initiatives.

## **Clear and Accessible Communications**

The Information and Communication Standard under the Integrated Accessibility Standard Regulation requires the OPS to communicate and provide information in ways that are accessible to people with disabilities. This includes delivering information and communications in accessible formats to all OPS employees. Unfortunately, the OPS continues to fall very short of ensuring internal communications are clear and accessible.

### **Accessible Communications and Remote Work**

Currently, the OPS is considering how to modernize its workforce through different modes of working. As part of this planning effort, the OPS will likely be exploring new technologies and tools to support its workforce now and in the future. It is critical that the OPS ensure that accessible communication is prioritized as part of this modernization planning. Wherever possible, accessibility features should be the default option that is available to all OPS employees without going through the disability accommodation process.

The shift to remote work during the COVID-19 pandemic revealed the importance of accessible communications in the context of remote work. Since March 2020, videoconferencing has become the primary meeting tool for OPS employees. However, videoconferencing proposes unique barriers to accessible communication, in particular for employees with hearing impairments. In the 2021 OPS Employee Experience Survey results, 16.4% of employees with disabilities reported having a hearing impairment. These barriers include: lack of automated closed captioning; poor quality audio arising from built-in microphones and speakers; inconsistent use of written materials to support clear

communication; and lack of consistent use of web cameras. While employees with hearing impairments may make accommodation requests in the context of remote work, the OPS employer has a broader obligation to remove systemic employment barriers<sup>1</sup> that prevents full participation in the workplace. Implementing technology such as videoconferencing without proactively considering and addressing accessibility issues falls within the definition of systemic employment barrier.

AMAPCEO recommends that the OPS Employer, when procuring new technologies, such as audio-visual communication hardware and software or upgrading existing software, should include accessibility features (e.g., automated speech to text) as a key requirement. The OPS employer should also ensure that, wherever possible, any built-in and add-on accessibility features are automatically included and provided to all employees without the need to make an accommodation request.

## **Employer Proposals for Digitally-Inclusive Communications**

As part of the 2022 – 2027 MYAP, the OPS Employer is proposing initiatives to ensure members of the public and employees of all abilities are provided with equitable access to compliant OPS digital information, products and services.

### **1. Develop a Digital Accessibility Standard**

Currently, the OPS has numerous resources on web accessibility and document accessibility, but there does not appear to be one single standard that provides an overarching framework for digital accessibility. Creating a Digital Accessibility Standard that complements the digital accessibility requirements in the Integrated

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<sup>1</sup> OPS Policy on Preventing Barriers in Employment defines “systemic employment barrier” as a human resource management rule, standard, requirement, or practice, in whole or in part, which, when applied in the same way to everyone, has the effect of excluding or restricting the participation of some individuals within the workplace, based on prohibited grounds of discrimination in employment under the Human Rights Code.

Accessibility Standards Regulation (specifically, ss. 12 and 14) would be very helpful in clarifying accountabilities, responsibilities and specific accessibility requirements.

## **2. Develop Role-Based Accessibility Skills Requirements for Job Specifications**

This proposed initiative would be a positive step towards expanding accessibility competency across the OPS. All OPS job specifications should include the minimum accessibility skills requirements as set out in the Accessibility for Ontarians with Disabilities Act (AODA) and the Integrated Accessibility Standard Regulation (IAST). Accessibility skills refer to the skills and knowledge that OPS employees need to create documents, websites and other types of communications accessible. However, simply adding accessibility skills requirements to job specifications is not enough to guarantee that OPS employees will be able to develop and be able to apply accessibility skills in their work. Ensuring digital communications are accessible takes time and resources. As previously stated, members of AMAPCEO's Disability Caucus reported that creating accessible documents is not a priority in many program areas for numerous reasons, including a lack of time to complete accessibility training and making documents accessible. This is due in part to assumptions and anti-disability bias, such as no one in the intended audience has accessibility needs, or that it's more important to deliver on time even if that means people with disabilities will be excluded from the final result.

The OPS employer needs to take active steps to ensure that creating accessible digital communications is valued and prioritized. To this end, AMAPCEO recommends the OPS employer:

- Make accessible communications training mandatory for all OPS employees
- Include accessibility skills and requirements on all OPS employee performance development plans
- Clarifies in the 2022 – 2027 MYAP that all OPS employees have an obligation to create and participate in clear and accessible communications

- Clarifies in the 2022 – 2027 MYAP that OPS senior leadership is accountable for ensuring internal communications are accessible

### **3. Implement the OPS Web Accessibility Plan**

AMAPCEO supports the development and implementation of an OPS Web Accessibility plan. Currently, OPS websites must meet the Web Content Accessibility Guidelines (WCAG) 2.0, level AA.<sup>2</sup> It is critical that an OPS Web Accessibility Plan includes proactive strategies for addressing systemic barriers that would prevent the full implementation of this particular strategy. It should also clearly set out the roles that are accountable for implementation of the OPS Web Accessibility Plan.

### **4. Create and implement the OPS Web Accessibility Literacy Strategy \***

AMAPCEO encourages the employer to establish a goal to ensure that all OPS employees reach a level of web accessibility literacy within a reasonable time frame.

It is critical that an OPS Web Accessibility Literacy Strategy includes proactive strategies for addressing systemic barriers that would prevent the full implementation of this strategy. It should also clearly set out the roles that are accountable for implementation of the OPS Web Accessibility Literacy Strategy.

## **Accessible Employment**

The Employment Standard under the Integrated Accessibility Standard Regulation sets out accessibility requirements that the OPS must follow to support the recruitment and accommodation of employees.

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<sup>2</sup> <https://intra.ontario.ca/ops/guide-to-determining-web-compliance-exceptions>

## **Taking a Proactive Approach to Accessible Employment**

As discussed above, members of AMAPCEO's Disability Caucus reported that the OPS' approach to accessible employment is largely reactive and generally relies on individuals with disabilities to ask for assistance with accessibility. In contrast, a proactive approach to accessibility means considering how systemic barriers, biases and exclusion may impact or preclude accessible employment and addressing or removing those biases or barriers. Accessibility should be embedded in decision-making, policy development, service delivery, and space design.

One key example is the application process for OPS vacancies. Currently, OPS job postings advise applicants with disability accommodation needs to contact Recruitment Services for assistance. This reactive approach places a heavy onus on applicants with disabilities, who may be concerned about being outed as having a disability and how this will impact their candidacy. There are many proactive actions the OPS could take to ensure that the recruitment process is accessible, such as conducting all interviews in accessible buildings and offering phone and video interview options.

AMAPCEO recommends that the OPS employer conduct an analysis of its current recruitment process to identify barriers to accessibility and, wherever possible, implement strategies to proactively address those barriers.

## **Developing an Intersectional Approach to Accessible Employment**

Intersectionality is a term that is used to describe how race, gender, ability, sexuality and other individual characteristics intersect with one another and overlap to create experiences of discrimination and privilege. An intersectional approach to accessibility considers how an individual's experience of disability and their accessibility needs are shaped by their other characteristics.

The current OPS accessibility framework, including the MYAP, is silent on intersectionality. The approach to disability and accessibility is primarily based on a medical model of disability that frames accessibility as an individual problem. It does not adequately consider how other aspects of the workplace, such as systemic barriers, biases and exclusion, affect the accessibility needs of employees with disabilities.

An intersectional approach to accessibility would mean considering “non-medical” or culturally-based accessibility strategies. For example, an Indigenous OPS employee with disabilities may have specific cultural requirements as part of their accommodation needs for their medical disability.

An intersectional approach to accessibility would also mean considering how workplace dynamics affect employees’ experiences of disability and accessibility needs. In the context of the OPS, this may mean considering how other workplace inclusion policies should be considered to support workplace accessibility. For example, a Black OPS employee seeks accommodation for a mental health condition. The employee’s condition is being exacerbated by microaggressions in the workplace. To make the workplace accessible for this employee, the employer must address workplace racism in accordance with the *OPS Anti-Racism Policy*.

AMAPCEO recommends that the OPS employer include intersectionality as a key consideration in accessible employment. For example, intersectionality should be added to the *Disability Accommodation Policy* as a principle.

## **Employer Proposals for Barrier-Free Employment**

As part of the 2022 – 2027 MYAP, the OPS Employer is proposing initiatives to ensure that candidates and employees with disabilities have support to join, work effectively, experience career growth, and have opportunities for learning development and progression.

## **1. Develop and implement recruitment strategies to help increase the representation of persons with disabilities throughout the OPS\***

AMAPCEO agrees that the OPS employer must do more to increase the representation of persons with disabilities throughout the OPS. The OPS employer has made limited progress in this regard: in the 2011 Employee Experience Survey, 11.5% of respondents identified as a person with a disability.<sup>3</sup> In the 2021 Employee Experience Survey, 13.2% of respondents identified as a person with a disability.<sup>4</sup> According to the *2017 Canadian Survey on Disability*, 20.2% of Ontarians over the age of 15 have a disability.<sup>5</sup>

The OPS *Policy on Preventing Barriers in Employment (PPBE)* establishes principles and requirements for identifying, removing, mitigating and preventing systemic employment barriers that may arise from human resource management directives and policies, or from practices relating to the implementation of those directives and policies. AMAPCEO recommends that the OPS employer should review the PPBE through a critical disability lens to ensure that the PPBE specifically addresses employment barriers for persons with disabilities.

AMAPCEO also recommends that the OPS employer should also implement recommendation 8 from the *Ontario Public Service Third Party Review of Inclusive Workplace Policies and Programs – Final Report*, released on March 19, 2021. This recommendation advocates for the inclusion of diversity, accessibility, inclusion and respectful workplaces in the talent management cycle. It also asks the OPS employer to work with employee networks to incorporate best practices in all aspects of the talent management cycle.

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<sup>3</sup> <https://www.ontario.ca/page/2017-ops-employee-survey-results#section-13>

<sup>4</sup> [https://intra.ontario.ca/tbs/employee-experience-survey-results#part\\_m](https://intra.ontario.ca/tbs/employee-experience-survey-results#part_m)

<sup>5</sup> <https://link.springer.com/article/10.1007/s10803-020-04603-3/tables/3>

AMAPCEO also recommends that the OPS employer implement the relevant recommendations in AMAPCEO's *Submission to the OPS Inclusive Workplace Policy and Program Review*. Specifically, the OPS employer should conduct a review of structural policies using an equity and intersectional lens (including critical disability theory) to assess their impacts on pathways to leadership for employees from equity-seeking groups and develop mitigation strategies.

## **2. Support postsecondary students and graduates with disabilities in preparing for the job market**

AMAPCEO encourages the OPS employer to create and improve supports for post-secondary students and graduates with disabilities in preparing for the job market. To this end, AMAPCEO recommends that the OPS employer should leverage existing experience, resources and relationships with post-secondary institutions within the Ministry of Colleges and Universities.

Another critical component of ensuring the career success of post-secondary students and graduates with disabilities is preparing employers to employ and support persons with disabilities. This may include educational programs to break down ableism in job sectors, funding for workplace accommodations and enhanced resources on disability accommodation in the workplace for new employees.

## **3. Streamline and integrate employment accommodation (Third-Party Review Leadership Pledge commitment #6)**

AMAPCEO agrees that significant improvements to the employment accommodation process are needed. Members of the AMAPCEO Disability Caucus cited the current disability accommodation process as one of the biggest challenges facing employees with disabilities. Instead of supporting the full participation of employees with disabilities in the workplace, the disability accommodation process is itself a substantial barrier. Members describe the disability accommodation process as

adversarial, intrusive, suspicious and inconsistent. Members also report that experiences and outcomes of the disability accommodation process depend heavily on the manager. If an employee has a supportive manager who understands disability accommodation, it is more likely that the employee will have a positive outcome. If the employee has a manager who lacks knowledge of disability accommodation, the outcome is more likely to be negative.

AMAPCEO members are amongst the most job-fluid within the OPS. Shifting positions, ministries, compensation units, as well as the acceptance of numerous temporary assignments and secondments are commonplace for our membership. However, when members change jobs, within their own ministry or to a different ministry, they are expected to go through the disability accommodation process again to develop a new accommodation plan with the approval of their new manager, even if their existing plan is sufficient to ensure they are accommodated in their new role.

AMAPCEO recommends that the OPS employer review the Disability Accommodation Policy to address systemic barriers and biases within the existing disability accommodation process. The OPS employer should also ensure every OPS manager completes disability accommodation training and adds accommodation knowledge to management job specifications and performance development plans. Further, the Policy should be reviewed with a view to supporting the smooth transition of employees with existing accommodation plans into new roles and opportunities.

Finally, AMAPCEO recommends that the OPS employer implement the *Ontario Public Service Third Party Review of Inclusive Workplace Policies and Programs – Final Report* recommendations specific to people with disabilities and improving the disability accommodation process.

#### **4. Expand mental health resources and services (Third-Party Review Leadership Pledge commitment #10)**

In 2017, the OPS adopted a Mental Health Framework<sup>6</sup> that the Centre for Addiction and Mental Health (CAMH) helped create after facilitating a series of focus groups to gather input. The Framework outlines a vision, five-key categories, and their strategic goal.

*The Ontario Public Service Third Party Review of Inclusive Workplace Policies and Programs* supplied extensive evidence that the OPS has a great deal of work to shift the culture so that employee mental health is valued and appropriately supported.

There is a glaring absence of an employee-facing accountability regime for mental health wellness. There is also a clear gap in achievement of the goals articulated for the five key categories. Far too often our members advise that they are unable to access what they need to manage their mental health. Far too often our members outline that their management is contributing to their eroding mental health. Far too often members complain that their workplace is not free from the stigma associated with mental health and addiction.

The 2017-2021 MYAP highlighted that the Mental Health framework “...will outline ministry-specific and enterprise-wide initiatives that promote mental health well-being and awareness.”<sup>7</sup> It is not clear how the Framework is integrated into existing operational policies and procedures.

The OPS has a great deal of work to do if it still aspires to be an exemplar organization on valuing and supporting employee mental health and wellness. As the organization works to better align its policies, procedures and practices in response to the third parties’ reviews and the subsequent Leadership Pledge<sup>8</sup>, there is an opportunity for the OPS to adopt and integrate clear goals, responsibilities, and accountability mechanisms

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<sup>6</sup> <https://intra.ontario.ca/ops/ops-mental-health-framework>

<sup>7</sup> <https://www.ontario.ca/page/2017-2021-ops-multi-year-accessibility-plan>

<sup>8</sup> <https://intra.ontario.ca/tbs/third-party-review-ops-inclusive-workplace-policy-and-programs#Leadership%20Pledge>

to enable it to achieve its articulated vision of being “...a workplace that values, protects and supports employee mental health well-being.”

Members with mental health disabilities reported experiencing harrowing difficulties in becoming accommodated, even in workplaces where their managers and senior leaders outwardly expressed support for mental health. Some members reported their managers minimized or totally dismissed their mental health disabilities because “they didn’t look sick”.

Members with mental health disabilities also reported challenges in identifying effective accommodation strategies for their particular condition(s). While an employee’s medical practitioner may make recommendations for accommodations, it is ultimately up to the OPS employer to determine which accommodations are appropriate in the circumstances. Accommodations for mental health disabilities are often more nuanced than accommodations for physical disabilities. Mental health accommodations often require managers to modify their behaviours and be mindful of how their actions impact the employee with the mental health disability. For example, an employee with anxiety disorder experiences panic attacks when their manager sets meetings without first notifying them of the meeting topic. To accommodate the employee, the manager should ensure they inform the employee before scheduling a meeting. This small behavioural change on behalf of the manager would have a substantial impact on the employee’s wellbeing.

It is critical that the OPS employer develops expertise in mental health accommodation. At a minimum, all disability accommodation specialists must have specialized training on mental health accommodation. The OPS employer should also develop resources for managers on accommodating mental health in the workplace. The OPS employer should also require all managers to complete training on mental health bias and stigma.

## **Accessible Government Facilities**

The Design of Public Spaces Standard under the Integrated Accessibility Standard Regulation requires the OPS to ensure that newly-constructed or significantly renovated public spaces (e.g., beach access routes and accessible parking) are accessible.

## **Employer Proposals for Accessible Government Facilities**

As part of the 2022 – 2027 MYAP, the OPS Employer is proposing initiatives to ensure clients and employees of all abilities feel welcome in OPS facilities that incorporate inclusive design practices and technologies.

### **1. Clarify accountability and establish accessibility oversight of OPS owned and maintained facilities**

AMAPCEO agrees that the OPS employer needs to clarify accountability and oversight of OPS owned and maintained facilities.

### **2. Review and update the Guidelines for Barrier-Free Design of Government Facilities to align with best accessibility practices \***

AMAPCEO agrees that the Guidelines for Barrier-Free Design of Government Facilities should be reviewed and revised to ensure it meets current best accessibility practices. The OPS employer should also require a review of the Guidelines on a regular, scheduled, basis to ensure their currency.

### **3. Develop and implement enterprise office workspace standards including accessibility for new office infrastructure projects and retrofits \***

AMAPCEO agrees that enterprise office workspace accessibility standards are needed. Designing workspaces with “built-in” accessibility features would create more inclusive work environments for all employees. While it may not be currently possible to design workspaces that are suitable for all accessibility needs, it is possible to create workspaces with features that meet many accessibility needs and are easier to adapt to

additional accessibility needs. Establishing an enterprise-wide workspace accessibility standard would create consistency for employees with disabilities and may simplify the transference of accommodation resources from one workplace to another.

#### **4. Develop resources to build OPS expertise around inclusive design**

AMAPCEO agrees that the OPS needs to build internal expertise in inclusive design. Inclusive design is a mandatory requirement for newly-constructed or significantly renovated OPS workspaces, therefore it should be viewed as an integral part of OPS facilities and infrastructure management. As such, it is critical that the OPS employer provide the resources necessary to build in-house expertise on inclusive design, such as hiring additional experienced employees, and/or developing training and providing employees with sufficient time to acquire expertise.

## **Inclusive Public Spending**

Under the Integrated Accessibility Standard Regulation, the OPS must incorporate accessibility design, criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so.

### **Supporting OPS Employees in Procurement Roles**

AMAPCEO agrees that the OPS employer should take steps to increase accessible procurement expertise within its workforce. It is critical that employees who are responsible for accessibility in procurement have a strong understanding of accessibility and have access to resources to support this work. AMAPCEO recommends that the OPS employer implement mandatory accessibility training for procurement employees.

AMAPCEO members in procurement roles report that their jobs are complex, demanding and fast-paced. It is important to recognize that requiring these employees to develop accessibility expertise would add to their already heavy workload and work-related stress. It is critical that the OPS employer to ensure procurement employees have the time and resources available to develop additional expertise and implement accessible procurement. This may include hiring additional procurement employees to better distribute workloads and reassessing timelines where appropriate.

## **Procuring Accessible Resources for Employees**

As previously discussed, the OPS employer's primary approach to accessibility is reactive: employees with disabilities generally need to make an accommodation request to receive accessible resources, such as adjustable chairs, accessible smartphones, screen reading technology, etc.

However, the procurement of employee resources provides the OPS employer with a key opportunity to proactively address accessibility. The OPS employer should prioritize procuring resources that are as accessible as possible to reduce the need for accommodation requests to acquire additional accessibility resources or features. For example, choosing desks that can accommodate mobility devices and are adjustable, and ensuring that accessibility software is automatically added to new laptops.

## **Employer Proposals for Inclusive Public Spending**

The OPS employer is proposing initiatives to ensure accessibility is effectively integrated at each stage of procurement and transfer payment processes to ensure no public dollars are spent in creating barriers for persons with disabilities.

- 1. Embed specific mandatory accessibility criteria into accessible procurement templates \***

AMAPCEO agrees that the OPS employer should embed specific mandatory accessibility criteria into accessible procurement templates. This would strengthen the existing Accessibility in Procurement Guidelines.

**2. Develop an Accessible Procurement Toolkit to build employee and vendor expertise \***

AMAPCEO agrees that the OPS employer should develop an Accessible Procurement Toolkit to build expertise.

**3. Embed accessibility accountability requirements in transfer payment rules, processes and funding agreements**

AMAPCEO agrees that the OPS employer should embed accessibility accountability requirements in transfer payment rules, processes and funding agreements.

## **Summary of AMAPCEO Recommendations**

### **Developing an Integrated and Holistic Approach to Building an Accessible OPS**

AMAPCEO recommends that the OPS employer:

1. Conduct an analysis of the MYAP and accessibility policies to ensure the policies are aligned and complementary.
2. Develop an integrated diversity, accessibility, inclusion and respectful workplaces strategy that incorporates the 2022 – 2027 MYAP and clearly outlines how the MYAP intersects and interacts with other DAIR initiatives.

### **Clear and Accessible Communications**

AMAPCEO recommends that the OPS employer:

3. When procuring new technologies, such as audio-visual communication hardware and software or upgrading existing software, should include accessibility features (e.g., automated speech to text) as a key requirement.
4. Ensure that, wherever possible, any built-in and add-on accessibility features are automatically included and provided to all employees without the need to make an accommodation request.
5. Make accessible communications training mandatory for all OPS employees.
6. Include accessibility skills and requirements on all OPS employee performance development plans.
7. Clarifies in the 2022 – 2027 MYAP that all OPS employees have an obligation to create and participate in clear and accessible communications.
8. Clarifies in the 2022 – 2027 MYAP that OPS senior leadership is accountable for ensuring internal communications are accessible.

## **Accessible Employment**

AMAPCEO recommends that the OPS employer:

9. Conduct an analysis of its current recruitment process to identify barriers to accessibility and, wherever possible, implement strategies to proactively address those barriers.
10. Include intersectionality as a key consideration in accessible employment, including adding intersectionality to the *Disability Accommodation Policy* as a principle.
11. Review the *Policy on Preventing Barriers in Employment* through a critical disability lens to ensure that the PPBE specifically addresses employment barriers for persons with disabilities.
12. Implement recommendation 8 from the *Ontario Public Service Third Party Review of Inclusive Workplace Policies and Programs – Final Report*, (INDSight) released on March 19, 2021, to integrate DAIR into talent management cycle.

13. Implement the recommendations regarding developing and implementing an intersectional approach to DAIR and the *Policy on Preventing Barriers In Employment* in AMAPCEO's *Submission to the OPS Inclusive Workplace Policy and Program Review*.
14. Leverage existing experience, resources and relationships with post-secondary institutions within the Ministry of Colleges and Universities to support postsecondary students and graduates with disabilities in preparing for the job market.
15. Review the Disability Accommodation Policy to address systemic barriers and biases within the existing disability accommodation process, and with an emphasis on supporting career mobility for employees with disabilities.
16. Ensure every OPS manager completes disability accommodation training and add accommodation knowledge to management job specifications and performance development plans.
17. Implement the *Ontario Public Service Third Party Review of Inclusive Workplace Policies and Programs – Final Report* recommendations specific to people with disabilities and improving the disability accommodation process.
18. Develop expertise on accommodating mental health conditions, and ensure that all disability accommodation specialists have specialized training on mental health accommodation.
19. Develop resources for managers on accommodating mental health in the workplace.
20. Require all managers to complete training on mental health bias and stigma.

## **Accessible Government Facilities**

AMAPCEO has no further recommendations and supports the OPS employer's proposed recommendations.

## **Inclusive Public Spending**

AMAPCEO recommends that the OPS employer:

21. Develop mandatory accessible procurement training for employees who work in procurement.
22. Ensure procurement employees have the time and resources available to develop expertise and implement accessible procurement.
23. Prioritize procuring resources that are as accessible as possible to reduce the need for accommodation requests to acquire additional accessibility resources or features.