Vancity Community Investment Bank

Accessibility plan. 2024 - 2027



Territory acknowledgement.

We acknowledge the land that our Toronto office is situated on is the traditional territory of many nations including the Mississaugas of the Credit, the Anishnabeg, the Chippewa, the Haudenosaunee and the Wendat peoples and is now home to many diverse First Nations, Inuit and Métis peoples. We also acknowledge that Toronto is covered by Treaty 13 with the Mississaugas of the Credit.

We would also like to acknowledge that VCIB is also headquartered on the Musqueam, Squamish and Tsleil-Waututh First Nations. They have been custodians of this land for thousands of years and we would like to pay our respect to the elders both past and present.

General information.

About Vancity Community Investment Bank (VCIB).

We are Vancity Community Investment Bank, but you can call us VCIB. Born from Vancity's community-first finance model, we're building on 70 years of banking experience to support organizations and enterprises that share a commitment to positively impact the communities where they live and work.



Accessibility statement.

Vancity Community Investment Bank (VCIB) is dedicated to creating a banking experience that is welcoming and accessible to everyone, regardless of their abilities. We value your input and actively seek feedback on how we can improve the accessibility of our services. If you encounter any barriers or have suggestions for making our services more accessible, please do not hesitate to reach out to us through our designated accessibility feedback channel. Your feedback helps us ensure that we are continuously evolving to better meet the needs of all our customers.

General information.

At VCIB, we value your feedback on our accessibility practices and are dedicated to continuously improving our services to better serve our members and the community. Your insights and suggestions are important to us.

You can reach us in the following manner:

Toronto Sales Office Mailing Address:

Vancity Community Investment Bank #1800-200 King Street West Toronto, Ontario M5H 3T4

Toll-free phone: 1-888-708-7800

Telephone device for the deaf: 1-888-702-7702

info@vcib.ca

Timelines for alternate formats.

To request a copy of VCIB's Accessibility Plan and/ or Feedback Form in an alternate format, or to provide feedback on accessibility at VCIB, please contact accessibility@vcib.ca.

- For large print (increased font size and clarity)
 within 20 days of a request.
- For braille (a system of raised dots that people who are blind or who have low vision can read with their fingers) within 45 days of a request.
- For audio (a recording of someone reading the text out loud) within 45 days of a request.
- For electronic (an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities) within 20 days of a request.

Executive summary.

In 2019, the Accessible Canada Act (ACA) was enacted with the goal of making Canada barrier-free by 2040. The ACA emphasizes identifying, removing, and preventing accessibility barriers within federal jurisdiction, focusing on the following domains to achieve this objective:

- Employment
- Built environment
- Information and communication technologies (ICT)
- Communication (other than ICT)
- Design and delivery of programs and services
- Procurement of goods, services, and facilities
- Transportation

As a financial services business, Vancity Community Investment Bank (VCIB) aligns with the ACA's priority areas. VCIB's Accessibility Plan ("the Plan") aims to identify and eliminate barriers across the above domains, and we working to ensure that our practices adhere to accessibility standards, all with the goal of creating a more inclusive and accessible environment for business partners, employees, and the public.

Through consultation with people with disabilities, we have identified barriers and solutions across our banking offerings as well as in our VCIB specific services, such as our business credit card application process, website navigation, and providing information in simplified, plain language.

Through consultation we will prepare a plan that outlines the actions we plan to take to identify, prevent and remove barriers. This process will take three years (2024-2027) and during this period we will provide yearly progress reports.



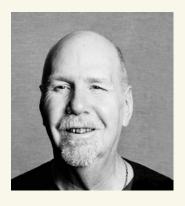
Consultations with people with disabilities.

About Untapped Accessibility.

Untapped Accessibility helps organizations improve accessibility, whether they're meeting legal requirements or making it a priority for their business. The team goes beyond just following the rules, creating truly inclusive spaces for everyone.

Their group of accessibility experts works with organizations to reach their accessibility goals. Untapped Accessibility is also a social enterprise. The revenue they generate supports the Open Door Social Services Society, which helps people with disabilities find meaningful and long-term employment.

Subject matter experts.



Andrew Tutty (he/him), Ontario

Andrew is blind and graduated from a George Brown College and CNIB Business Computing program and subsequently worked using personal computers and peripherals in the business environment. Utilizing Andrew's lived experience with vision loss, he has been involved with disability issues since the late 1980's in the various communities in which he has lived including as a board member of The Physically Handicapped Citizen's Association of Georgetown, The Halton Hills Accessibility Advisory Committee, and as Co-Chair of the Grand River Accessibility Advisory Committee, advising these municipalities on their accessibility initiatives. Andrew has applied his business and computing experience and has provided website user accessibility audits for Untapped Accessibility, focusing on the user experience on website as it relates to overall useability and screen reading accessibility on the web.



Anu Pala (she/her), British Columbia

Anu brings over 25 years of experience in the areas of diversity and inclusion training, vocational consulting, media, and advocacy. Anu possesses strong knowledge of screen readers such as JAWS for Windows and Voiceover and has extensive experience helping businesses and organizations create accessible workplaces. Anu also has expertise in professional communications, vision loss and cultural diversity. Anu currently serves as president on the SIETAR BC board, member of the TELUS Local Content and STORYHIVE advisory committee and is a member of the City of Surrey's Measuring Up committee.



Robbie McDonald (she/her), British Columbia

Robbie is delighted to be part of the Untapped team. She is a graduate of the Community Capacity Building with SFU where she was awarded a grant to curate a panel discussion about neurodivergence in adulthood. She specializes in presentations, training, writing and workshops that build more neuroinclusive workplaces and communities. As a deaf and neurodivergent consultant, Robbie has collaborated with a variety of non-profit and social purpose organizations. She is currently serving a three-year term on the TransLink Accessibility Advisory Committee, and she was nominated by the Open Door Group as an Inclusive Workplace Champion, Individual in 2023.



Leanna Manning (she/they), British Columbia

Leanna is an accessibility consultant who supports organizations to deliver on accessible messaging as part of their overall communications. She specializes in plain language communications, digital accessibility, and conscious and inclusive language. She applies these skills through a combination of copywriting, editing, rewriting, consulting, and training. With over a decade of professional experience and her own lived experience with disability and divergence, Leanna brings a unique perspective and passion to her work.



Lisa Blinn (she/her), Ontario

Lisa is a 2021 graduate of the Accessible Media Program at Mohawk College, where she received intensive training to create accessible digital content and documents. She has a deep understanding of Canadian and global disability legislation and how it applies creating policy which is designed to remove barriers and promote inclusion. Through digital and organizational audits, she identifies areas of non-compliance, and develops accessibility plans that consider the budget and resources available to each organization.



Wanda Deschamps (she/ her), Ontario

Wanda is the founder and principal of Liberty Co – a consultancy focused on increasing neurodiverse employment with a special emphasis on autism due to her own diagnosis at midlife. Prior to founding Liberty Co, Wanda enjoyed a twenty-five-year career in the philanthropic sector serving with leading Canadian institutions. Now a neuroinclusion thought leader and speaker, she partners with public, private and non-profit organizations across Canada, and is known for bringing creativity and passion to every session, panel, and keynote. In recognition of the impact she is making, Wanda is the 2024 recipient of the Phillip Emmerson Award for Employment Excellence from CASE (Canadian Association for Supported Employment).



Tamara Vandendool Cable (she/her), Alberta

Tamara has over 15 years of experience as a consultant, lecturer, and developer. Legally blind since birth and having lost most of her remaining vision in her early teens, she has been a lifelong user of assistive technology. She works with various clients, from mom-and-pop businesses to educational institutions and Fortune 500 companies.



Melissa Lyon, M.Ed., B.Ed., TESOL (she/her), British Columbia

As an educator with a master's degree in special education and as a person with a disability herself, Melissa Lyon (she/her) offers self-paced or synchronous online accessibility and inclusion courses through her Accessibility & Inclusion Matter Consulting company. She has also worked with various non-profit organizations, as a consultant, writer, resource developer, and a volunteer. Her areas of expertise include knowledge and strategies for both K-12 education & post-secondary education; creating resources or courses related to disability awareness, inclusion, and accessibility; and mentoring other people who have disabilities.



Noah Senecal-Junkeer (he/him), British Columbia

Due to Complex Regional Pain Syndrome (CRPS), he uses speech recognition software and a headmouse on his computer or mobile device. He's experienced in providing accessibility feedback to Designers and Developers, including those from Fortune 500 companies. Before becoming an Accessibility Consultant, he was a Research Analyst at Scotiabank and Jarislowky Fraser. He's also a mentor for Inclusion BC.



How the consultation informed our plan.

Vancity Investment Bank and Untapped Accessibility held a two-hour session with nine accessibility experts who have personal experience with disabilities. Before the session, each expert reviewed VCIB's services, website, and other materials, documenting any barriers

they encountered, noting successful accessibility features, and suggesting potential solutions.

During the session, the experts provided feedback on various accessibility issues, including cognitive, emotional, and physical barriers, based on their unique experiences. This feedback helped us identify challenges and develop recommendations for each area outlined by the Accessible Canada Act (ACA). It also helped prioritize the actions VCIB will take to remove and prevent these barriers.

The barriers and recommendations are presented below under each ACA domain. Moving forward, VCIB will ensure that ongoing feedback and consultation are integral to our approach. We will implement an accessibility feedback form and a dedicated contact to address accessibility concerns, capturing insights that will continue to shape our plans and progress reports.

Employment.

At VCIB, we aim to make our workplace welcoming and accessible for everyone. This means making sure our hiring practices and work environment support all employees, including those with disabilities. Ensuring accessibility is crucial not only during the hiring process but also from the very beginning of a candidate's interaction with our organization. The journey starts when potential employees first encounter job postings or reach out for information, and it continues through the interview process, and post- interview. Accessibility should be a fundamental part of every stage, starting with how we communicate and present opportunities. By embedding accessibility from the outset, we demonstrate our commitment to creating an inclusive environment where all individuals, including those with disabilities, feel valued and supported. Below, we outline the barriers and the actions we will take based on the expert feedback we received.



Participants noted the need for clearer communication about accessibility in job postings. They emphasized that disabled applicants often require different options for navigating the application process. Suggestions included highlighting accessibility practices, offering flexible interview options, and providing multiple application methods. Additionally, clearer headings and larger fonts were recommended to enhance accessibility. Effective communication about flexibility and the value of diverse workplace contributions can help make the application process more welcoming for all candidates, and support applicants in feeling comfortable requesting appropriate accommodations.



Successful accessibility features.

- Many participants liked seeing information about benefits and work-life balance on the careers page. This is important for disabled applicants and should be included directly in job postings.
- Participants liked the myDiversity survey and found it easy to use.



Barriers.

- Job descriptions did not mention accessibility or specifically welcome applications from disabled/ neurodivergent individuals.
- Job postings were long and unfocused.
- Job descriptions were unclear and used jargon.
- Job descriptions were not straightforward, lacked organization, the font sizes were small.
- Information unclear regarding flexible work arrangements particularly around hours and location when applying for positions.
- Some participants were offended by the inclusion of the diversity survey in the job posting, feeling it was not appropriate given the difficulties involved in job searching.
- The diversity survey used outdated terms like "able-bodied" and "able-minded."



Recommendations.

- Clearly mention accessibility and invite applications from disabled and neurodivergent individuals in all job postings, with a clear message that disabled applicants are valued, not just accommodated.
- Provide clear details on flexible work options, especially regarding hours and location.
- An invitation for individualized accommodations should follow, reflecting the organization's commitment to creating a flexible and comfortable environment for all employees.
- Provide clear guidelines, training, and communication for employees on how to request accommodations.
- Include information about alternative interview options (e.g., remote or working interviews) and what to expect during the interview process.
- Shorten and focus job descriptions, using plain language and avoiding jargon.

- Organize job descriptions clearly, use larger fonts, and ensure key information is easy to find.
- Update the myDiversity survey language, replacing outdated terms like "able-bodied" with "disabled" or "non-disabled."



Actioned/to be completed (2024):

- Highlight accessibility in postings.
- Invite individualized accommodations.
- Organize job descriptions clearly.
- Use larger fonts, highlight key info.

2025:

- Detail flexible work options.
- Provide training on accommodation request guidelines.
- Simplify and shorten job descriptions.
- Offer alternative interview options and clarify the process.

2027:

Update myDiversity survey language.

We are firmly committed to implementing these recommendations and any additional insights we gather over the next three years. Our goal is to ensure that all applicants and employees can show up as their full selves in a workplace that truly embodies robust accessibility practices. We believe that by creating an inclusive environment, we can support everyone in contributing their best work.



Built environment and procurement of facilities.

Accessibility in the built environment is fundamental to creating spaces where everyone, regardless of ability, can engage with and benefit from our services. Ensuring that our physical spaces are inclusive requires thoughtful design and ongoing commitment and alignment to accessibility standards, and meeting or exceeding, current regulations. This means addressing not just the physical layout but also considering how people interact with those spaces—from entrances, pathways, and restrooms to lighting, signage, and emergency exits.



Summary.

Our goal is to eliminate barriers that limit access and participation. This includes conducting regular reviews of our facilities, soliciting feedback from individuals with disabilities, and ensuring that future projects align with the highest accessibility standards. Through these efforts, we aim to create environments that promote safety, comfort, and equitable access for all employees, business partners, and visitors. The barriers identified below were uncovered during a physical audit of the VCIB space in Toronto. Since this space is leased, it presents additional challenges, as VCIB does not own the building. Therefore, it is essential for our Facilities team to build a strong relationship with the property owner and secure their commitment to address and remediate any identified deficiencies wherever possible.



Successful accessibility features.

- At least one primary entrance is accessible.
- Door width meets minimum requirements.
- Automatic doors.
- Clear entrance signage at entry way.
- Pathways and parking are accessible and meet minimum width for wheelchair passage.
- Curb cuts and ramps are present at key locations.
- Corridors and doorways meet minimum width requirements (for turning space).

- Elevator meets accessibility requirements in terms of interior dimension, controls at accessible height and visual audible indicators of floors and directions.
- Stairs and handrails meet most minimum accessibility requirements (handrails, stair dimensions).
- Washrooms are mostly accessible (grab bars, sink height, mirror height).
- Safety and Emergency egress features include visual alarms and audible alarms, accessible emergency exits, and exit signage well illuminated.
- Common areas and meeting rooms are generally accessible providing space for wheelchairs, and tables that are at accessible heights.



Barriers.

- No automatic door at the interior access. The front door is heavy, making it difficult for some individuals to enter.
- Lack of ramps creates accessibility challenges for those using wheelchairs or other mobility aids.

- Absence of high-contrast edge markings on each step which increases the risk of accidents, especially for individuals with visual impairments.
- Corridors and halls current dimensions are 1066.8 mm by 965.2 mm, which do not meet the required 1400 mm x 1400 mm for accessibility.
- Inadequate signage. There is no clear highcontrast or tactile signage; Braille is only available in elevators. Signage to restrooms is also lacking.
- Inaccessible restroom. The restroom door is not automatic, making it difficult for individuals with a disability to access.
- Inaccessible stalls. Stalls do not provide the required minimum turning space of 1500 mm x 1500 mm; they currently measure only 812.8 mm x 863.6 mm.



Recommendations.

Note: These recommendations should be prioritized based on feasibility and impact, recognizing that collaboration with the property owner and facilities is essential for implementation.

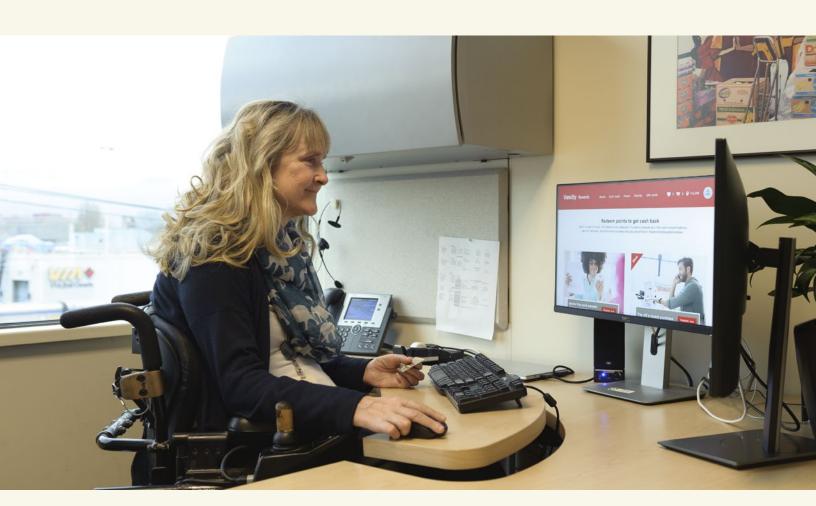
- Build a strong partnership with the property owner to secure commitments for necessary modifications and improvements.
- Ensure that both the front entrance and interior access doors are equipped with automatic openers for easier access.
- Construct ramps at key entry points to improve accessibility for individuals using wheelchairs or mobility aids.
- Install high-contrast edge markings on all steps to enhance visibility and reduce the risk of falls.
- Work with the property owner to widen corridors to meet the required dimensions of 1400 mm x 1400 mm.
- Install clear high-contrast signage with tactile and Braille text throughout the space, including directional signs to restrooms.
- Install an automatic door for the restroom to facilitate easier entry for individuals with disabilities.
- Redesign stalls to ensure a minimum turning space of 1500 mm x 1500 mm, allowing for greater accessibility.



Actioned/to be completed (2024):

- Contact Facilities to discuss recommendations in the context of ACA.
- Connect with landlord/building owner on best path forward.
- Review ACA Draft Standards for Built Environment.
- Review the Ontario 2012 Building Code which defines accessibility for new construction and renovations.
- Review Ontario's Design of Public Spaces Standard.
- Review Canadian Standards Association (CSA) B651-18: Accessible Design for the Built Environment
- Review National Building Code of Canada (NBC)

While we recognize that the feasibility, cost, and impact of each recommendation may vary, our first priority at this time is to familiarize ourselves with relevant legislation, regulations, and building codes. We are also focused on establishing a strong relationship between our Facilities team and the property owner. With this foundation, we reaffirm our commitment to finding a mutually agreeable and feasible solution for implementing the recommended improvements over the next three years.



Information, Communication, Technology (ICT).

Information, Communication, and Technology (ICT) are key to creating an inclusive and accessible environment for everyone. Digital tools like websites, mobile apps, and electronic documents are used every day by employees and business partners to work and access services. We are committed to removing barriers and making sure that all our technology is easy to use for everyone. We will follow best practices and meet accessibility standards like the Web Content Accessibility Guidelines (WCAG) to make sure all platforms are designed for everyone and are accessible to individuals with a disability. This commitment will help both employees in their work and business members in accessing the services they need. We want to create a digital environment where everyone, no matter their ability, can easily access information and engage with our organization.



Summary.

Amongst the nine (9) subject matter experts, three (3) were screen reader users and one (1) a speech recognition user. They identified several technical barriers on the VCIB website, including difficulty navigating due to a fast-moving carousel, unclear hover menus, and the absence of a "skip to main content" option. Confusing and redundant links, like "about" and "about us," added to the challenge. Other issues included unclear information, poor color contrast, no accessibility statement, and non-descriptive button labels. Suggestions for improvement included adding anchor links, improving dropdown menus, and ensuring the site meets WCAG 2.2 standards. Many users expressed frustration with the navigation, which could lead to disengagement, and loss of potential business/ revenue.



Successful accessibility features.

Font size was appropriate and well-received.



Barriers.

- Information about VCIB's work, impact, and clients is not clearly presented. This should be clearly highlighted on the homepage with easyto-follow headers.
- The website lacks an accessibility statement or any mention of accessibility.
- Many participants had difficulty navigating the homepage and instead used direct links provided by Untapped Accessibility to locate specific pages.
- The fast-moving carousel on the VCIB homepage was overwhelming for users, causing some to disengage.
- Speech recognition users faced cognitive overload due to the multiple ways to interact with items. For instance, it wasn't clear that hovering over the main menu was necessary to reveal options, and executing this hover action was challenging.

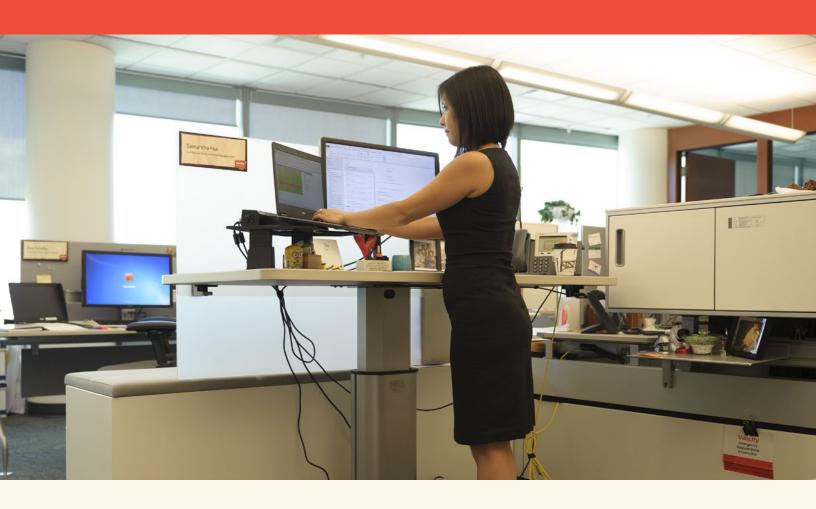
- Without a "skip to main content" option, screen reader users had to listen to all menu options every time they accessed a new page.
- The presence of both "about" and "about us" links led to confusion because their content seemed too similar.
- The use of red and green colors may present challenges for colorblind users, with some participants also finding these colors distracting.
- Videos should include captions and, when necessary, descriptive audio or voiceovers to make the content more accessible and impactful.
- Button labels need to be more specific, as generic labels like "Click here" make it difficult for screen reader users to navigate the site effectively.
- Menus should clearly indicate which keys, such as the space bar or enter key, should be used to select options in a dropdown menu.

- Some elements labeled as buttons were not properly coded, preventing screen reader users from using the "B" command for buttons, as they were likely coded as links.
- A screen reader user was unable to complete a form due to being timed out by Captcha.

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Recommendations.

- Ensure the homepage and other sections clearly reflect VCIB's commitment to accessibility.
- A "down carrot" icon could suggest that a menu requires hovering to access it.
- A more effective solution would be to have the menu open with a click and remain open until the user manually closes it, either using a close button or the escape key.
- Including anchor links that automatically scroll to specific sections of a webpage would enhance navigation for speech recognition users.
- Web developers should consult the WCAG 2.2 guidelines for information on accessibility.
- Improve button descriptions for screen readers.



Timeline(s).

Actioned/to be completed end of 2025:

- Use click-to-open menus with manual ability to close or use escape key.
- Enhance button descriptions.
- Explicitly welcome disabled users.
- Clearly reflect VCIB's accessibility commitment.
- Add anchor links for navigation.
- Consult WCAG 2.2 guidelines.

Significant barriers currently hinder the user experience on the VCIB website. Clear communication about VCIB's work, impact, and clients is essential, and an accessibility statement should be prominently featured. To enhance navigation, we will implement recommendations to improve clarity, such as simplifying the homepage layout, adding descriptive button labels, and ensuring that menus are user-friendly for all types of interactions. By addressing these issues and adhering to WCAG 2.2 guidelines, we are committed to creating a more inclusive online environment that allows all users, to engage fully with our content. Through these efforts, we aim to provide a seamless and accessible experience for everyone.

Communication (not ICT).

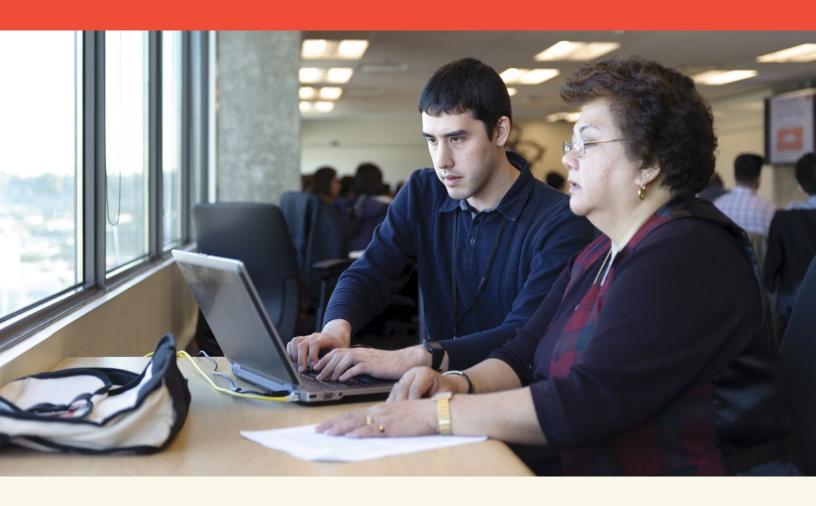


Summary.

VCIB connects with clients, colleagues, and communities through various channels, including in-person interactions, printed materials, online platforms, and phone communication. However, there is limited awareness of accessibility requirements across the organization, and our communication methods—such as graphics, banners, and brochures—may lack inclusive language. Additionally, consistent guidance on using accessible materials for meetings and presentations is missing. Participants noted the absence of a straightforward form or contact information for accessibility feedback. The current "resolving a complaint" form is lengthy and inadequate, causing frustration due to complex language. Many felt their concerns might go unaddressed without a clear feedback process. Suggestions included creating a dedicated tab for accessibility feedback, offering multiple reporting methods (like form, email, or phone), and ensuring feedback links are easily accessible on the website.



- There was no straightforward form or contact information for submitting accessibility feedback.
- The existing "resolving a complaint" form included a lengthy description that did not directly address accessibility concerns.
- The use of jargon, lack of plain language made the content feel intimidating and anxiety-inducing.
- The absence of a specific area for accessibility feedback suggested that such input might not be valued or properly addressed, reducing the likelihood of resolving issues.
- Making the accessibility feedback option easily accessible from the header or footer on all website pages would improve navigation.



Recommendations.

- It would be beneficial to provide multiple options for reporting accessibility barriers, such as a dedicated form, direct email, and phone number.
- Simplify language and clarify accessibility information to make the website feel more inclusive and inviting.
- A specific tab for accessibility feedback should be added alongside the three current forms.

- Provide PDFs in various accessible formats, such as plain text.
- Ensure that all websites, including the intranet, meet WCAG Level 2 compliance or higher.
- Create a plan to incorporate accessibility into all communication and marketing activities.
- Share and enforce best practices; compare internal and external communications against ACA standards for accessibility.

Timeline(s).

Actioned/completed (2024):

*Note that as of the completion of the report a feedback form, an accessibility tab, accessibility statement, as well as a description of tools for making VCIB website material more accessible have been incorporated.

- Offer multiple reporting methods to report accessibility barriers: form, email, phone.
- Add an accessibility feedback tab next to forms.

2025:

- Simplify language and clarify accessibility information.
- Provide PDFs in various accessible formats.
- Ensure website meet WCAG Level 2 compliance.
- Create a plan for accessibility in communications.
- Share and integrate accessibility best practices.

While we connect through various channels, we recognize the need for greater awareness and clearer processes regarding accessibility. Currently, the lack of straightforward feedback options and the use of complex language hinder our efforts. To address these barriers, we will implement several key recommendations, including providing clear reporting methods, simplifying our communication, and ensuring that all materials meet accessibility standards.

Procurement of goods and services.

Under the Accessibility Canada Act (ACA), we are committed to prioritizing inclusive practices when selecting vendors, products and services that support our banking operations. This involves actively seeking accessible options that cater to the diverse needs of our members. By incorporating accessibility into our procurement process, we aim to eliminate barriers and create a banking environment where everyone can fully engage with our services. Complying with the ACA not only enhances our offerings but also reinforces our commitment to inclusivity and accessibility.



Barriers.

- There may be limited vendors available who can meet the same level of accessibility required by VCIB for some of our technical solutions.
- There is currently no standard or policy with respect to procurement of goods and services that are accessible.

- Employees in the procurement division may not know what to look for when choosing accessible providers of goods, services, or facilities.
- Vendor contracts do not currently include requirements for accessibility.



Recommendations.

- Annually review our procurement policy and processes to identify barriers and create corporate guidelines for procurement practices. These guidelines will set expectations for suppliers regarding accessibility, social responsibility, and diversity in their business practices.
- Regularly monitor vendors for improvements related to accessibility.
- Maintain an inventory of vendors with accessibility capabilities that meet VCIB's requirements established through our accessibility assessments.

- Include an accessibility review in the contract renewal process to improve contracts where necessary, ensuring compliance with any new or existing regulatory requirements.
- List vendors required to have accessibility plans based on ACA requirements, depending on the products or services they provide to VCIB, and the accessibility needs associated with those offerings.
- Engage with businesses owned or operated by individuals with disabilities.

Timeline(s).

Actioned/to be completed (2024):

- Connect with Procurement Division to review recommendations in the context of ACA
- Review Ontario government's Accessibility rules for procurement
- Review Queen's University for example of Procurement Policies for accessible and diverse vendors Strategic Procurement Services

2025:

- Review procurement and update procurement policies for accessibility.
- Include accessibility reviews in vendor contracts.
- Inventory accessible vendors regularly.
- Monitor vendors for accessibility improvements.
- Engage disability-owned businesses actively.
- List vendors needing accessibility plans**.
- ** VCIB should identify and document which vendors must have accessibility plans in place. These requirements are based on the Accessibility Canada Act (ACA) and are determined by the specific products or services each vendor provides, as well as the accessibility needs related to those offerings.

VCIB is committed to promoting inclusivity in our vendor selection and procurement processes. By prioritizing accessible options that cater to the diverse needs of our members, we aim to eliminate barriers and create an environment that is accessible for all.

Design and delivery of programs and services.

The design and delivery of services play a crucial role in ensuring that all individuals can access and benefit from the services provided by organizations. In the context of the Accessibility Canada Act (ACA), this domain emphasizes the importance of creating inclusive services that meet the diverse needs of all users, particularly those with disabilities. By prioritizing accessibility in service design, organizations can remove barriers and enhance user experiences, ensuring that everyone has equal opportunities to engage with and utilize services effectively.



Summary.

Most participants found the process of applying for a credit card and reviewing the VCIB sell sheet generally accessible. They encountered some navigation difficulties on the website but could complete the Visa application with few issues once

they located the form or used a direct link. The form functioned well for screen reader and speech recognition users. However, the lack of clear information, complex financial terms, and absence of an accessibility statement made the site feel unwelcoming for users with disabilities. The VCIB sell sheet posed significant challenges, particularly for screen reader users, many of whom could not open it or struggled with the reading order. This raised concerns about future accessibility barriers. In contrast, non-screen reader users found the layout and negative space beneficial for reducing cognitive load but noted that the plain language could be improved with more consistent sentence structures, especially in lists. Participants appreciated the inclusion of contact information on the sell sheet. Suggestions for improvement included allowing users to save their progress, providing example responses, and enhancing navigation for screen readers. Experts emphasized the need for more accessibility information on the application page and suggested mentioning alternative application methods to create a more welcoming experience for disabled applicants.



Successful accessibility features.

- Applying for a business credit card and filling out the intake form was easy to understand.
- The form successfully checked the information provided, like identifying and suggesting corrections for invalid email addresses, which is an important accessibility feature.
- The lack of a timer for completing the application is beneficial, as timers can lead to anxiety and stress.
- The form was designed to be accessible for screen readers, featuring clearly labeled fields and clearly communicated required information.
- The dropdown options were easy to navigate without any delays.
- The document (sell sheet) includes plenty of negative space, which helps reduce cognitive load.
 Icons are used effectively for visual organization.
- From a cognitive perspective, the document is easy to access and review, using clear and simple language.

 Many participants appreciated the inclusion of direct contact information instead of only linking to a "contact us" form on the website.



Barriers.

- The row of headings at the top of the page (e.g., Overview, Manage My Visa) was confusing, making it difficult to locate the credit card application.
- While the form was generally accessible, the separate text labels and fillable fields created redundancy, leading to repeated information when navigating, which increased cognitive load.
- After submitting the credit card application, there is insufficient descriptive information provided.
- The form resembles a contact form more than an application form, which could lead to confusion. It is recommended to clarify this on the webpage.
- Open-ended questions on the form may confuse some users; providing options or example responses could help.

- The use of financial jargon can create an unwelcoming atmosphere, and the lack of accessibility information makes the site feel inaccessible for disabled business owners. This absence of information can lead to feelings of discouragement, even for those familiar with VCIB's values.
- After submitting the form, a brief message states that someone will be in touch soon; including an estimated response time would enhance clarity.
- Uncertainty exists regarding the accessibility of certain webpages, which can create confusion for users.
- The text size on the form was too small.
- Ensure sufficient color contrast in overlapping elements like buttons, headings, and background graphics to enhance readability.
- The menu system did not clearly indicate dropdown functions to screen readers, making it seem non-functional.
- Some elements lacked contextual labels to inform users of their purpose.

- Additionally, the absence of a search function and excessive information on certain pages increased cognitive load and frustration.
- Mislabeling elements as buttons when they are not adds to confusion and complicates navigation.
- Screen reader users had difficulty locating the "apply now" button; coding it as a header would improve navigation.
- The document would benefit from higher color contrast and better alignment between images and content.
- The overall purpose of the document is unclear.
- Improving plain language by making sentence structures more parallel, especially in lists and sections with icons, would enhance readability.
- The sell sheet contains two calls to action; simplifying it to one clear call to action would make the message more effective.
- These materials are designed to promote VCIB's services. If they are not accessible to all users, it may indicate a lack of inclusivity in reaching the intended audience.

- Screen reader users faced significant challenges with this document (sell sheet), with many unable to access it at all.
- For those who could open the document, the incorrect reading order rendered much of the content unreadable.
- The contact information within the PDF should be made more clearly clickable, allowing users to easily identify it as selectable.



Recommendations.

- It is essential to provide clear information about how buttons work on the website.
- One solution is to slow down the pace and add a pause button, allowing users to process information at their own speed.
- Enabling users to save their progress and return later to finish the application would give them the opportunity to take breaks when needed.

- Offering additional information on why only certain organizations are invited to apply for the Visa would be beneficial and could create a more welcoming atmosphere.
- Ongoing testing of the website by individuals with disabilities is vital. It is important to refer to WCAG and other resources to comprehend the wide array of accessibility solutions available.
- Offering an estimated response time after email contact or providing a direct booking option, (through Calendly for example), would be helpful.
- Offering multiple formats for this document, such as a plain text version, would better support screen reader users.

Timeline(s).

Actioned/to be completed end of 2025:

- Provide clear button functionality.
- Add pause button for processing.
- Allow users to save progress.
- Share estimated response times.

- Explain organization invitation criteria.
- Enhance button descriptions.
- Offer document in multiple formats.

By prioritizing clear communication, accessible materials, and effective feedback mechanisms, we can ensure that all users—particularly those with disabilities—can fully engage with our services. While many participants found our application process and materials generally accessible, we recognize the need for ongoing improvements. Addressing navigation challenges, simplifying financial jargon, and enhancing the usability of our documents will help us remove barriers and foster a welcoming experience. Through transparency, collaboration, and a dedicated focus on accessibility, we will continue to evolve and reflect our values of equity and inclusivity.

Transportation.

In the context of the Accessibility Canada Act (ACA), while we do not directly coordinate a transportation system, we can play a significant role in enhancing transportation accessibility for our business partners and the communities we serve. We are committed to providing clear information about accessible transit options and how to reach our office. This includes offering details on nearby accessible public transit routes, ensuring that this information is easily accessible on our website and through other communication channels. We will also provide guidance on accessible parking options available at our location, including designated spots and any necessary permits. Additionally, we will share resources and links to accessible transportation services in the area, ensuring that everyone can access our facilities comfortably. Moreover, when VCIB staff travel for business purposes, we will prioritize accessible services to ensure that all staff can travel without barriers. This commitment includes planning for accessible

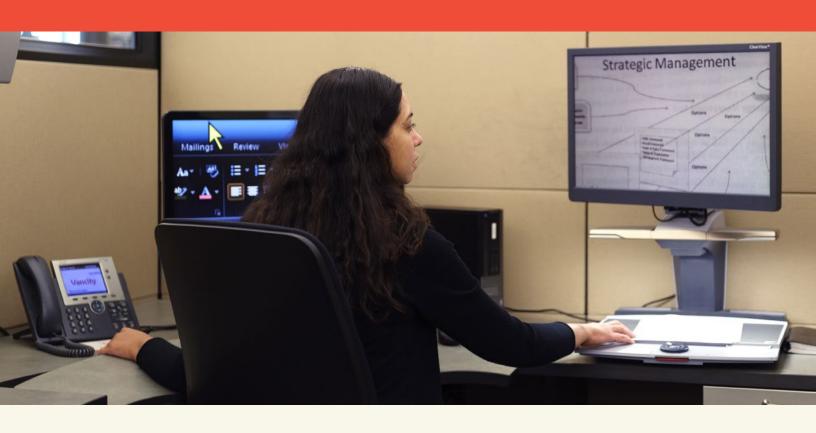
transportation options and providing necessary accommodations to support staff with varying needs. By focusing on these areas, we aim to create a more inclusive environment that supports the mobility needs of all individuals, making it easier for them to engage with our services.



Timeline(s).

Actioned/to be completed end of 2025:

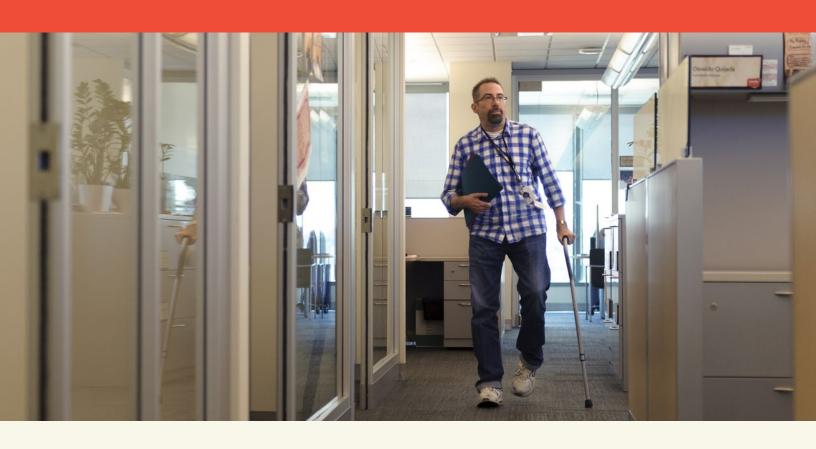
- Provide information regarding accessible travel options to VCIB under our "Contact us" section.
- Regularly include accessible transport and parking information for all events, whether onsite, offsite, or during employee travel.



Conclusion.

Our accessibility plan underscores our commitment to creating an inclusive environment for everyone we serve. We recognize the importance of clear communication, accessible materials, and meaningful feedback. By implementing the recommendations outlined in this plan, we aim to improve the usability of our website, enhance communication practices, and ensure all business partners feel valued and heard. We are committed to making accessibility an integral part of the development of all digital platforms and programs.

This ongoing process begins with the creation of a detailed accessibility statement, outlining the steps we've taken, known barriers, and a timeline for improvements. A feedback mechanism will also be established to gather input from the community, ensuring that concerns are addressed and incorporated into future updates. Our priority will be to remove significant barriers, especially those that hinder access for individuals/applicants with a disability. Through this plan, we will keep our members, the public, interested parties, and employees informed of our accessibility efforts, providing annual updates to ensure transparency, accountability, and progress. We remain dedicated to making meaningful changes that reflect our values and promote equity across our organization.



Glossary of terms.

Accessibility is the design of products, devices, services, environments, technologies, policies, and rules that makes their access possible for all people, including people with a wide range of disabilities.

Accessible Canada Act (ACA) came into force on July 11, 2019. The legislation was enacted with the goal of removing barriers and achieving accessibility within areas of federal jurisdiction on, or prior to, January 1, 2040.

Accommodation is the legal obligation of eliminating disadvantages and barriers to employees, prospective employees or customers resulting from policy or practice that has more have an adverse impact on individuals or groups protected under the Canadian Human Rights Act.

American Sign Language (ASL) is the language of D/deaf Canadians. ASL uses signs, facial expressions, body language and finger spelling to convey information. Its vocabulary and grammar constructs are different from that of English.

Barriers are defined by the Accessible Canada Act (ACA) as anything that hinders the full and equal participation of people with an impairment in society. The impairment could include, cognitive, communication, functional, intellectual, learning, mental, sensory, or physical limitations. The barriers could be architectural, attitudinal, physical, or technological; barriers could be based on information or communication or the result of a policy or practice.

Captions are text displayed on videos to enable people to read dialogued sounds. Closed Captioning (CC) can be turned on or off by the user whereas open captions are part of the video itself and cannot be turned off. Automated captioning, such as those available on Microsoft Teams.

D/deaf is used as a collective noun to refer to both people who identify with the Deaf culture and people who have little to no functional hearing who do not identify with the Deaf culture.

Deaf with a capital "D" refers to individuals who are deaf or hard of hearing and who identify with and participate in the language, culture, and community of Deaf people, using sign language as the first choice of communication. Deaf culture does not perceive hearing loss and deafness as a disability, but as the basis of a distinct cultural group. Culturally, Deaf people may use speech reading, gesturing, spoken language and written English to communicate with people who do not sign.

Deafened and late deafened describes individuals who grew up hearing and either suddenly, or gradually, experienced a profound loss of hearing or hard of hearing. Late-deafened adults usually understand speech with visual clues like captioning or computerized notetaking, speech reading or sign language.

Disability is defined by the Accessible Canada Act as any impairment that, in interaction with a barrier, hinders an individual's full and equal participation in society. The impairment could include, cognitive, communication, functional, intellectual, learning, mental, sensory, or physical limitations. The impairment may also be permanent, temporary, or episodic in nature, and either visible or hidden. People with Disabilities (PWD) describes people who have long-term physical, mental, intellectual, or sensory impairments who interact with various barriers that may hinder their full and effective participation in society on an equal basis with others.

Teletypewriter (TTY) is a device that enables people who are D/deaf, hard of hearing or people with speech impairments to use the phone by typing messages.

Universal Design is the planning and configuration of an environment, building, product, program, or service so that it can be accessed and used to the greatest extent possible by all people.

Web Content Accessibility Guidelines (WCAG) are a set of recommendations for making Web content more accessible, primarily for individuals/applicants with a disability—but also for all user agents, including highly limited devices, such as mobile phones. WCAG 2.0, were published in December 2008 and became an ISO standard, ISO/IEC 405.