

# **Trans Mountain**

## **Accessibility Plan**

### **Progress Report 2023**

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# General

## Introduction

Trans Mountain Corporation is a federal Crown corporation headquartered in Calgary, Alberta. We operate Canada's only pipeline system transporting oil products to the West Coast. We have a permanent workforce of over 600 employees working in our Calgary head office and regional offices along the pipeline system in Alberta, British Columbia and Washington state. Trans Mountain Corporation is a wholly owned subsidiary of Canada Development Investment Corporation (CDEV). We are governed by an independent Board of Directors. We are accountable to the Parliament of Canada through CDEV.

In accordance with the *Accessible Canada Act*, Trans Mountain published our initial [Accessibility Plan](#) in 2022 and have been working this year to enact the objectives we identified. This year we have made ongoing progress in improving accessibility throughout our organization and will continue to identify barriers and improve accessibility. This Progress Report is an update to our 2022 plan, and will outline actions we have taken, new barriers we have identified, and our plans for mitigating these barriers moving forward. Trans Mountain has created an internal action plan for the next two years that will support us in addressing the identified barriers. Trans Mountain will work with key strategic partners to ensure we are continuously learning and acting on best practices.

## Contact Information

Trans Mountain welcomes feedback on this Accessibility Plan Progress Report. You may request an alternative format of this progress report or a description of the accessibility feedback process from our Senior Advisor of Inclusion, Diversity, Equity & Accessibility (IDEA) at [info@TransMountain.com](mailto:info@TransMountain.com). A receipt of feedback will be provided in the same format that it is received so long as the feedback is not submitted anonymously. To provide feedback or request an alternative format, please contact:

Address:  
300 5th Avenue SW  
Suite 2700  
Calgary, AB T2P 5J2

Telephone number: 1.866.514.6700  
Email address: [info@TransMountain.com](mailto:info@TransMountain.com)

## Consultations

In 2023, consulting with stakeholders was a top priority for Trans Mountain. We prioritized seeking feedback from persons with disabilities and interested parties. To receive input from stakeholders, Trans Mountain worked with a third-party of accessibility experts to consult with members of the organization who represent the priority areas of the *Accessible Canada Act*. Over 10 interviews with priority area representatives were conducted and three working sessions were hosted to better understand how to improve accessibility at Trans Mountain. Additionally, an invitation was sent to all employees asking for input from persons with disabilities and interested parties. Employees had the option to provide feedback through a one-on-one interview with third party accessibility experts or to complete an anonymous survey. Both the interviews and the survey were centred around understanding where barriers to accessibility exist and how Trans Mountain can work to eliminate those barriers.

The information collected from these consultations are the foundation of this progress report. Trans Mountain is committed to continuing to engage persons with disabilities in this process and we welcome feedback from all our stakeholders.

## Priority Areas

The seven priority areas described under Section 5 of the Accessible Canada Act (ACA) include:

- employment
- the built environment
- information and communication technologies (ICT)
- communication, other than ICT
- the procurement of goods, services and facilities
- the design and delivery of programs and services
- transportation

Trans Mountain has included the additional priority area of “Culture” in our Accessibility Plan Progress Report. We are working to build a strong culture of accessibility and want to highlight it as one of our priority areas.

## Culture

### Progress in 2023

We have highlighted below several of the actions taken this year to improve the culture of accessibility at Trans Mountain.

#### **Accessibility included in the Inclusion, Diversity, Equity and Accessibility (IDEA) portfolio**

Trans Mountain has changed the name of our former Diversity, Equity and Inclusion (DEI) portfolio to more directly include accessibility. We have rebranded it Inclusion, Diversity, Equity, and Accessibility (IDEA).

#### **Statements of commitment**

Trans Mountain has developed a statement of commitment to accessibility. This statement has been shared internally and externally (see [TransMountain.com/accessibility](https://TransMountain.com/accessibility)). This is in addition to our IDEA commitment statement available on our intranet site and will be displayed on the external facing IDEA webpage(see [TransMountain.com/inclusion-diversity-equity-and-accessibility-idea](https://TransMountain.com/inclusion-diversity-equity-and-accessibility-idea)). These statements are centered around inclusivity and continuous learning about accessibility and disability.

#### **Accessibility included as part of a job description**

Trans Mountain has dedicated an IDEA advisor within Human Resources to provide support and resources within the company in relation to inclusion, diversity, equity and accessibility. This individual will support improving our accessibility practices and will connect us with internal and external resources when required.

#### **Accessibility intranet site pages**

To improve internal knowledge of our efforts to be more accessible, Trans Mountain has developed pages on the IDEA intranet location focused on accessibility. This site shares our accessibility plan, links to relevant policies and resources, and other important information.

### New Accessibility Barriers Identified in 2023

During consultations this year, employees highlighted the following barriers to accessibility related to Culture:

- Need for increased awareness of accessibility at the executive/ leadership level
- Limited opportunities for sharing the stories and lived experiences of Trans Mountain employees with disabilities



## **Future Considerations**

To address the barriers above, Trans Mountain is planning to take the following actions:

### **Executive and leadership accessibility training**

Trans Mountain will work to provide accessibility-related training at the executive level. Trainings will support executives in building awareness of accessibility and disability, as well as how they can support employees. Executives will be encouraged to share with the organization their commitment to advancing accessibility at Trans Mountain.

Timeline: Trans Mountain aims to offer executive-level accessibility training in 2024 to be followed by training for other leaders in early 2025.

### **Increased representation of persons with disabilities on Trans Mountain councils**

We know the importance of having representation of employees with lived experience within an IDEA council. We will be working in 2024 to create an IDEA council and recruit council members that have lived experience of disability. Trans Mountain will create a framework for the IDEA council that includes executive-level sponsorship to recruit employees more effectively.

Timeline: Trans Mountain aims to create an IDEA council and recruit council members with lived experience of disability in the first quarter of 2024.

### **Improved opportunities for employees with disabilities to share their experiences**

To foster an open culture of accessibility, Trans Mountain is committed to more widely sharing the stories and experiences of persons with disabilities. Trans Mountain will hold a campaign to highlight the stories and lived experiences of persons with disabilities. Sharing the stories of leaders or executives with disabilities will help to normalize disability.

Timeline: Trans Mountain will create an IDEA communication plan for 2024 that includes speaker series, internal and external communications, and accessibility themed events.

## Employment

### Progress in 2023

We have highlighted below several of the actions we have taken this year to improve accessibility in Employment at Trans Mountain.

#### Clearly outlining the accommodations process

Having accommodations processes that are clear and user friendly is a key priority for Trans Mountain. In 2023, we used stakeholder feedback to update and expand our accommodation policies. Based on feedback received, the accommodation process was not well defined and well promoted. Employees can now access the 'Request for Workplace Accommodation' form through Mainline (the Trans Mountain intranet). Employees can also contact Human Resources for further support on accommodations.

#### Adding accommodation to Human Resources policies

Trans Mountain understands the importance of making accommodations easily accessible to employees. We feel it is important for policies regarding accommodations to be directly connected to our general Human Resources policies. This year, we have updated our Human Resources policy and guidelines to include accommodation information. This will help employees more easily find the information they need.

#### Updated workforce survey

In 2023, Trans Mountain updated our confidential and voluntary workforce survey for employees and new applicants. The workforce survey now expands the definition of disability to include anyone who self-identifies as having an impairment or functional limitation, whether permanent, temporary, or episodic in nature. This is an important step towards better understanding the diverse composition of our workforce and to create plans to advance progress in relation to employment equity initiatives. This data will also help us to tailor strategies and policies that support our workforce's needs. Employees can submit or update their workforce survey at any time.

### New Accessibility Barriers Identified in 2023

During consultations this year, employees highlighted the following barriers to accessibility related to Employment:

- An application process that involves many steps and can be difficult to follow
- Need for improved accessibility of employee training
- Lack of opportunities for employees exiting the organization to provide feedback on accessibility

## **Future Considerations**

To address the barriers above, Trans Mountain is planning to take the following actions:

### **Review of employee application process**

Trans Mountain is committed to making our application process accessible for all applicants. We will request and review feedback from new hires via focus groups to identify specific accessibility barriers. We will also look at best practices for improving accessibility in the application process. With the information we gather, we can determine an action plan for what and how we can address potential barriers.

Timeline: In addition to obtaining specific feedback on the application process in 2024, we will update our job postings to explicitly invite persons with disabilities to apply and provide applicants with a contact for accommodations requests during the application process.

### **Improved accessibility of employee training**

We recognize there is room to improve the accessibility of our employee training. We are making this a priority in the coming years. We will continue to collect feedback from employees and will work to identify specific accessibility barriers. Trans Mountain is currently working to update training modules. We will be seeking support to help implement accessibility best practices in our employee training.

Timeline: Trans Mountain will be continuously seeking employee feedback on employee training. We anticipate having all training modules updated by the end of 2024 to be more accessible (including adding closed captioning where missing). We are committed to ongoing improvement to our training based on feedback and best practices.

### **Receiving accessibility feedback in employee exit surveys**

Trans Mountain wants to ensure we capture feedback on accessibility at all stages of the employee lifecycle. We will be working to include questions about accessibility in an exit survey for employees leaving the organization. We will be meeting with the leadership team to discuss how this information can be shared to create positive change.

Timeline: Trans Mountain will add an accessibility question to the employee exit survey in early 2024. From here, we will work to define a process for how this information can be used to improve accessibility at Trans Mountain.



## The Built Environment

### Progress in 2023

We have highlighted below several of the actions we have taken this year to improve accessibility in the Built Environment at Trans Mountain.

#### Collecting feedback from Trans Mountain employees

In 2023, Trans Mountain conducted a series of interviews with employees and offered an accessibility survey to better understand the current state of accessibility in the built environment. These interviews and the survey provided information on how Trans Mountain can make the workspace more accessible for all employees.

#### Updating office signage to include braille

Trans Mountain has begun work to update our office signage to include braille. We are committed to ensuring we are accessible to those with visual impairments and will be continuing this work in 2024.

### New Accessibility Barriers Identified in 2023

During consultations this year, employees highlighted the following barriers to accessibility related to the Built Environment:

- Need to complete new building accessibility audits
- Need for accessibility improvements in washrooms
- Lack of opportunity to provide feedback on the built environment

### Future Considerations

To address the barriers above, Trans Mountain is planning to take the following actions:

#### Conducting building accessibility audits

Trans Mountain is aware of the need to refresh past building accessibility audits as well as conduct accessibility audits in new locations. We will develop a plan to ensure necessary accessibility audits are conducted and renewed at regular intervals.

Timeline: In 2024, Trans Mountain will ensure a plan is created for what building audits need to be conducted and how often these audits will be refreshed.

#### Improved opportunities to provide feedback on the built environment

Receiving up to date feedback on accessibility of our physical locations is important to ensure we are accessible to employees and visitors. Trans Mountain will be working to promote a way for employees and visitors to provide feedback on the built environment. This feedback will be

used to make our facilities more accessible for persons with disabilities. Trans Mountain will also be adding a list of built environment accessibility features to employee onboarding materials in 2024.

Timeline: By the end of 2024, Trans Mountain will have implemented and promoted a way for employees and visitors to provide ongoing feedback on the built environment at our organization.

## Information and Communication Technologies (ICT)

### Progress in 2023

We have highlighted below several of the actions taken this year to improve accessibility in Information and Communication Technologies (ICT) at Trans Mountain.

#### Including accessibility criteria in vendor selection

In 2023, Trans Mountain took steps to have our IT vendor selection process more clearly consider accessibility. Trans Mountain now includes an accessibility questionnaire in all IT related requests for proposals (RFPs). This helps to ensure that the vendors being selected to support us with IT projects are considering accessibility as part of their delivery.

#### Enabling accessibility features

Trans Mountain has reviewed all accessibility features within the *Microsoft 365* environment. As part of this review, we have ensured all accessibility features are enabled for employees.

#### Accessibility included in the IT management policies

In 2023, Trans Mountain worked to review our IT management policies. We added accessibility considerations to the IT Acceptable Use Policy.

### New Accessibility Barriers Identified in 2023

During consultations this year, employees highlighted the following barriers to accessibility related to Information and Communication Technologies:

- Identification of non-accessible third-party software
- Need for training on accessibility features

#### Future Considerations

To address the barriers above, Trans Mountain is planning to take the following actions:

### **Reviewing third party software for accessibility**

Trans Mountain has worked this year to survey third-party IT vendors about the accessibility of their platforms. The information collected has helped increase awareness around accessibility features within the organization. There are vendors who have been unresponsive. Trans Mountain will follow-up with unresponsive vendors for answers on the accessibility of all third-party software platforms.

Timeline: In 2024, Trans Mountain will follow up with all non-responsive third-party IT software providers.

### **Providing training for using accessible IT features**

Trans Mountain has worked to ensure all accessibility features within the *Microsoft 365* environment are enabled for employees, but training on how to use these features is still needed. Trans Mountain will explore the types of trainings that are most needed for employees. We will consider options for how best to provide these trainings.

Timeline: In 2024, Trans Mountain will aim to create a framework for developing trainings related to IT accessibility. We will assess required resources.

## **Communications Other than ICT**

### **Progress in 2023**

We have highlighted below several of the actions we have taken this year to improve accessibility in Communications Other than ICT at Trans Mountain.

#### **More accessible newsletter**

Trans Mountain has reformatted our internal newsletter for employees and contractors to make it more accessible. We have explored various accessibility best practices and made changes including using more accessible text colours.

#### **Auditing corporate colours**

We want to ensure that all aspects of our communications are accessible. We are working to review aspects of our branding elements. We aim to add an accessible colour chart to our brand guidelines.

### **New Accessibility Barriers Identified in 2023**

During consultations this year, employees highlighted the following barriers to accessibility related to Communications Other than ICT:

- Lack of accessibility best practice guidelines
- Inability to easily request documents in alternative formats

## **Future Considerations**

To address the barriers above, Trans Mountain is planning to take the following actions:

### **Developing accessibility best practices**

Trans Mountain will work to explore and develop a set of accessibility guidelines for communications that highlight best practices. This will help ensure all team members have a shared understanding of accessibility.

Timeline: In 2024, Trans Mountain will develop resources to share with employees about accessible communications. In 2025, Trans Mountain will develop checklists and guidelines for employees and host events to communicate this information to employees.

### **Defining process for stakeholders to receive documents in alternative formats**

Where practicable, Trans Mountain is committed to offering documents to stakeholders in formats that best meet their needs. Trans Mountain will work to define a formal process for easily requesting documents in alternative formats. We will communicate this process to all employees and share this information with external stakeholders.

Timeline: In 2024, Trans Mountain will explore the best options to formalize and streamline the process for requesting documents in alternative formats. In 2025, we will communicate this process to stakeholders. We will seek feedback from stakeholders and persons with disabilities to assist in improving this process as we move forward.

## **The Procurement of Goods, Services and Facilities**

### **Progress in 2023**

We have highlighted below an action taken this year to improve accessibility in Procurement of Goods, Services and Facilities at Trans Mountain.

#### **Consultations with the procurement team**

In 2023, members of the procurement team met to discuss accessibility within the current procurement practices at Trans Mountain. These sessions have allowed us to plan for how we will improve the ways accessibility is considered in our procurement processes.

### **New Accessibility Barriers Identified in 2023**

During consultations this year, employees highlighted the following barriers to accessibility related to Procurement:

- Need for accessibility training within the procurement team
- Lack of accessible procurement documents

### **Future Considerations**

To address the barriers above, Trans Mountain is planning to take the following actions:

#### **Providing accessibility training to the procurement team**

Trans Mountain will work to identify trainings and external resources to support the procurement team in better understanding accessible procurement practices. We will work to use these resources to create an accessibility training plan for employees working in procurement.

Timeline: In 2024, Trans Mountain will explore training options that would be well suited to the procurement team. We will then work in 2025 to develop a training plan for all procurement employees.

#### **Improving the accessibility of procurement documents**

Trans Mountain will review our procurement documents to improve accessibility. We will work with all members of the procurement team to ensure these new changes are communicated and that employees are aware of accessible practices and processes.

Timeline: In 2024, Trans Mountain will review the documents that make up our procurement process. We will modify these documents to make them more accessible. In 2025, we will work to communicate changes to employees. We will ask for feedback for how to improve the documents further.

## **The Design and Delivery of Programs and Services**

### **Progress in 2023**

We have highlighted below an action taken this year to improve accessibility in the Design and Delivery of Programs and Services at Trans Mountain.

#### **Consultations with program delivery employees**

Trans Mountain focused this year on seeking input from employees who work in program delivery. In 2023, we hosted consultation sessions with employees to understand ways we could remove barriers for persons with disabilities. These sessions have allowed us to identify barriers and plan for how to better support the accessibility needs of our stakeholders.



## **New Accessibility Barriers Identified in 2023**

During consultations this year, employees highlighted the following barrier to accessibility related to Design and Delivery of Programs and Services:

- There is room to create more accessibility within stakeholder engagement

## **Future Considerations**

To address the barriers above, Trans Mountain is planning to take the following actions:

### **External stakeholder accessibility**

When Trans Mountain consults and meets with external parties, requested accommodations are provided if practicable. It should be noted that some of the initiatives described in other sections of this report will improve stakeholder accessibility such as updates to our built environment and external communication standards. However, we will continue to consider types of accessibility considerations and accommodations that can be offered to all stakeholders in external engagements.

Timeline: In 2024, Trans Mountain will continue to explore accessibility considerations and accommodations that can be provided during stakeholder engagements. We will continue to seek feedback from stakeholder groups and persons with disabilities.

## **Transportation**

Gaining a better understanding of accessibility within the area of transportation is a priority for Trans Mountain. We have reviewed our policies, practices, programs and services related to transportation and have determined that there are not any clearly defined barriers in the area of transportation, at this time.

We will continue to explore accessibility barriers in the area of transportation in 2024 and beyond. We will work to engage more internal and external stakeholders on this topic and look to seek more specific feedback from persons with disabilities on this topic.

## Feedback

Trans Mountain welcomes feedback on accessibility, especially from persons with disabilities. We are continuously reviewing our current process for receiving feedback about accessibility at Trans Mountain.

Feedback related to barriers to accessibility at Trans Mountain or the implementation of Trans Mountain's Accessibility Plan can be directed to:

Address:

300 5th Avenue SW  
Suite 2700  
Calgary, AB T2P 5J2

Telephone number: 1.866.514.6700

Email address: [info@TransMountain.com](mailto:info@TransMountain.com)

A receipt of feedback will be provided in the same format that it is received so long as the feedback is not submitted anonymously.

Trans Mountain has worked hard this year to seek feedback on the ways the organization can be more inclusive and accessible. We have used this feedback to identify new accessibility barriers and opportunities where we can continue to improve. This feedback has been reflected in the above priority area sections. In these sections, we have identified barriers and future considerations for making Trans Mountain more accessible. Trans Mountain conducted many consultations throughout 2023 to gain the perspectives of employees with disabilities. A more detailed description of our consultation process has been highlighted in the **"Consultations"** section.