



2024-2027

# Accessibility Plan

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## Alternate Formats

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# Introduction

## About BCI

British Columbia Investment Management Corporation (BCI) is amongst the largest institutional investors in Canada with \$250.4 billion in gross assets under management, as of March 31, 2024. Based in Victoria, British Columbia, with offices in Vancouver, New York City, and London, U.K., with a presence in Mumbai, India, BCI manages a portfolio of diversified public and private market investments on behalf of its 32 British Columbia public sector clients.

With a global outlook, BCI integrates environmental, social, and governance (ESG) factors in all investment decisions and activities that convert savings into productive capital to meet clients' risk and return requirements over time. Founded in 1999, BCI is a statutory corporation created by the Public Sector Pension Plans Act.

## Our Accessibility Story

Accessibility is part of BCI's broader commitment to equity, diversity, and inclusion. We are committed to reducing and preventing barriers and meeting the needs of all people working within or with our organization. We recognize accessibility as a human right and are committed to meeting legislative requirements set out in the Accessible British Columbia Act (the Act), and the Act's Accessible British Columbia Regulations.

We have woven accessibility principles into all areas of our business and are on a continuous accessibility journey as detailed within the following sections of this inaugural Accessibility Plan.

## About our Accessibility Committee

Our Accessibility Committee was established with a mandate to support BCI in making our workplace more accessible for all our employees, clients, suppliers, and partners. Our committee of fifteen (15) people are passionate about advancing accessibility and disability inclusion. Twelve out of fifteen of our committee members identify as having lived or learned experiences across a wide spectrum of disabilities. Our committee is diverse in identity, background, roles, and levels within BCI, and is representative of the diversity of our organization. Our committee played a key role in identifying and understanding barriers for employees and those interacting with BCI, which ultimately informed this Accessibility Plan. The Committee will continue to advise BCI on strategies to prevent and eliminate barriers within policies, programs, activities, and services throughout the organization.

The Committee is proud to have contributed our lived experiences and perspectives into the development of BCI's Accessibility Plan. The plan illustrates a strong commitment to addressing the needs and barriers faced by people with diverse abilities. We look forward to supporting the implementation of the plan's priorities and demonstrating another meaningful step BCI is taking to foster an equitable and inclusive workplace.

– A message from BCI's Accessibility Committee

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## Person-first Language

BCI recognizes the right of all persons with disabilities to self-determination. As part of a robust discussion with our Accessibility Committee, we have decided to use person-first language (e.g., person with disability) throughout our plan in alignment with legislative wording, however we encourage all BCI employees and those interacting with our organization to use language that they are most comfortable self-identifying with.

## The Framework Guiding Our Work

The following legislation was used in reference as we prepared the Accessibility Plan:

- **Accessible British Columbia Act** provides a legal framework to identify, remove, and prevent barriers to the full and equal participation of persons with disabilities in BC. As per the Act, BCI and other public sector BC organizations are called to:
  - Establish an accessibility committee;
  - Create a three-year Accessibility Plan; and
  - Create a mechanism to receive feedback from the public.
- **BC Human Rights Code** forbids discrimination based on “protected characteristics”<sup>1</sup> or “grounds of discrimination,” and protects and promotes human rights. Local applicable human rights legislation will also inform our accommodation efforts and initiatives in our global offices.
- **Accessible Canada Act** is federal legislation which aims to identify, remove, and prevent barriers faced by persons with disabilities.
- **UN Declaration on the Rights of Persons with Disabilities** protects the rights of persons with disabilities without any discrimination or exception.

## Principles of Inclusive Design

Below are the inclusive design principles that guided the development of our Accessibility Plan:

- **Inclusion:** At BCI, inclusion means ensuring an accessible job application process and organizational opportunities for all.
- **Adaptability:** BCI will continue to listen to the accessibility feedback we receive, monitor evolving legislative requirements, and keep up with leading practices for accessibility. We recognize that a commitment to accessibility is a continuous process, requiring adaptability to ensure our priorities consistently align with the focus on supporting employees and the evolution of accessibility.
- **Diversity:** We recognize that there is tremendous diversity within the community of persons with disabilities and that BCI must take an intersectional approach to enhance accessibility. BCI is a diverse organization, as demonstrated by our census data, which is one of our key strengths.

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<sup>1</sup> Protected characteristics include: Indigenous identity, race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, gender identity or expression, age, unrelated criminal conviction, military or veteran status, or any other characteristic that is protected under applicable national, federal, provincial, state, or local laws.

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- **Collaboration:** We are committed to continuing to engage our community, including the Accessibility Committee, while ensuring that feedback received is considered in the implementation of this Plan to confirm it is meeting their needs.
  - **Self-determination:** In making our organization accessible, we aim to empower persons with disabilities to define what accessibility looks like for them and how they wish to identify.
  - **Universal Design:** We have created our Accessibility Plan with universal design in mind. We have assessed our employment practices, built environment, information technology, communications, and procurement processes to improve accessibility across all aspects of our business and provide a seamless experience to all.

## Consultations

BCI consulted with our Accessibility Committee in the preparation of our Accessibility Plan. The Accessibility Committee provided feedback on BCI's practices and shared their lived experiences. Together, these insights informed the Accessibility Strengths, Barriers, and Priorities sections of this Plan.

BCI also consulted with accessibility advisors at Deloitte Canada to provide subject matter and industry expertise. Our consultations with Deloitte aided in our process of identifying leading accessibility practices, validating barriers identified, and developing impactful priorities.

Over the last 2 years BCI has also consulted with the Canadian National Institution for the Blind (CNIB) on accessible recruitment practices and in August 2023 engaged Copley Inclusive Solutions to perform an assessment of the accessibility of our Victoria office using Rick Hansen criteria.

We will continue to consult with our Accessibility Committee on the implementation of this Plan. These consultations, along with other employee feedback, will continue to inform our approach to accessibility and implementation of priorities going forward.

## Feedback Mechanism

Feedback informs our accessibility planning and priorities. We are committed to continuously listening, learning, and working to align our approach to accessibility with leading practices. If you would like to provide accessibility feedback, including feedback about this Accessibility Plan, or request an alternate format of the Accessibility Plan, or the description of our Feedback Mechanism, you can do so by emailing us at [accessibility@bci.ca](mailto:accessibility@bci.ca).

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# Accessibility Strengths, Barriers, and Priorities

## Employment

### Strengths

BCI employs more than 700 people across our global operations, with 95% of our workforce based in Canada. We aim to provide a barrier-free experience for all our employees and job candidates. We do so through the following:

- We have an accommodations team that supports accessibility accommodations, both for existing employees, new hires, and job candidates throughout the recruitment process.
- Our recruitment communications and job postings include an accessibility statement and an email contact that can be reached for accommodations requests.
- BCI has developed a formalized accommodations procedure and resources to support the talent acquisition team in providing a variety of accommodations and accessible communication during the recruitment process.
- Beyond our accommodations process, employees have access to a comprehensive suite of supporting resources, including our Total Rewards team, Dialogue (third-party confidential telehealth service providing primary care, Employee and Family Assistance Program and Mental Health+ toolkits), and additional extended health benefits including health and wellness spending accounts.

### Equity, Diversity, and Inclusion at BCI

Our strategic equity, diversity, and inclusion goals include creating intentionality and accountability, attracting, and accelerating top diverse talent, and activating engagement, performance, and innovation through inclusion. In support of these goals, we've developed a 3-year strategic roadmap with staged priorities and milestones. We also have a Diversity & Inclusion Learning Roadmap through which we are advancing organizational awareness and understanding of equity, diversity, and inclusion principles.

In addition to our formal Diversity & Inclusion Learning Roadmap, BCI provides employees with opportunities to learn more about the diversity within our organization through milestone events and employee storytelling. These cover a range of topics including Black History Month, International Women's Day, Asian and Arab Heritage Month, Pride, National Day of Truth and Reconciliation, Mental Health, and International Day of Persons with Disability.

In 2022, BCI engaged Deloitte to perform a comprehensive employment systems equity review to identify barriers, biases, and opportunities to enhance equity, inclusion and accessibility across our employment processes. The scope of the review included recruitment, talent management, total rewards, learning and development, and HR support processes.

In 2022, we also launched our inaugural employee self-identification census, which allowed us to gather workforce diversity data and feedback on inclusion. We will continue to seek feedback and measure our equity, diversity and inclusion progress by gathering data on our demographics and employee experiences.

The observations and recommendations stemming from the equity review, employee engagement survey and census have guided BCI's efforts to enhance equity, diversity and inclusion over the last two years and are informing the steps we take moving forward.

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## Barriers

While we have taken deliberate efforts to enhance accessibility within our talent acquisition processes, we recognize the need to take a more fulsome approach to accessibility within our performance management and development activities. To ensure managers can best support their teams, additional training and resources are needed on disability inclusion, accommodations and how to support the growth of employees with diverse abilities.

Despite being prepared to support our employees' accessibility needs and accommodations requests, the process has not been documented or communicated throughout the organization. This poses a significant barrier as employees may not be aware of how to request accommodations. Also, without clear policy or guidance, some employees may not feel comfortable requesting accommodations due to confidentiality and bias concerns.

## Priorities

**Priority #1:** We will document and communicate accessibility and accommodations procedures to support consistent, effective, efficient and transparent employee accommodations processes. We will centralize and communicate the procedure and other accessibility resources to ensure that it is continuously accessible, from the point of onboarding and throughout employment.

**Priority #2:** We will continue to increase awareness for our workforce on disability inclusion and accessibility in informal means to understand employee experiences and impacts of accessibility/disability inclusion.

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## The Built Environment

### Strengths

BCI's built environment is comprised of our office buildings. These include our BC offices in Victoria and Vancouver, our New York City office, and our London, UK office. Our Workplace Services team maintains all our offices and is continuously working to enhance the accessibility of our spaces based on barriers identified and feedback received.

In 2023, BCI engaged Copley Inclusive Solutions, as part of the Workplace Strategic review, to conduct an assessment ('the assessment') using Rick Hansen criteria to evaluate accessibility within our Victoria, BC office. Both the assessment and consultations with our Accessibility Committee identified strengths within our physical space, including accessible washrooms, automatic doors, hallway widths, stair design, quiet spaces, adjustable seating and surfaces for workstations, and consistency in high contrast and visibility in the office's design. Wellness/multifaith rooms are also available in all BCI buildings to provide employees a quiet and private space. Our visual office directory was also noted as a helpful resource cited by the Accessibility Committee for office navigation and space booking.

The assessment also detailed actions to be taken to enhance the office's accessibility. Some improvements that have already been made as a result of the assessment include the relocation of office café kitchenware to accessible heights, the purchase of a BeHear SMARTO Hearing Amplifier for use at our reception desk, and the relocation of sanitization stations to ensure they are visible but not obstructing paths of travel.

We have begun and will continue to incorporate our learnings from this assessment and other universal accessibility principles into the design of our other offices. This will remain an important focus during any future renovations or office relocations.

### Barriers

The assessment identified barriers to accessibility that exist in our Victoria, B.C. office. This includes both short-term and long-term recommended fixes.

Our Accessibility Committee also identified the following barriers:

- The open-concept offices can be distracting and cause barriers for those who require more sensory-friendly environments. While we have quiet spaces and a wellness room, they are not available on all floors and additional quiet spaces are needed. These quiet spaces can also be challenging to find, as some are unlabeled and require employees to search the visual office directory.
- Additionally, there is a need for greater awareness across our organization on what accessibility means within physical spaces, how individually and collectively employees can contribute to the accessibility of our built environment, and how to submit accessibility feedback on office accessibility issues.

Equipped with the knowledge of these barriers, we can take action to resolve them to enhance accessibility across all our offices.

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## Priorities

**Priority #3:** We will continue to improve the accessibility of our offices by responding to feedback on an ongoing basis and implementing learnings from the assessment to the spaces we operate in. Feasible short-term assessment recommendations will be implemented in a timely manner. Future renovation and office relocation plans will incorporate universal accessibility principles and other recommendations from the assessment.

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## Information Technology

### Strengths

At BCI, we use Information Technology (IT) as part of our day-to-day operations, to deliver our services and communicate with employees and clients alike. IT at BCI includes, but is not limited to, our Intranet platform, SharePoint Online, Workday, Microsoft Teams, the Microsoft Copilot AI program and Bloomberg.

We are actively seeking to enhance accessibility within our existing technologies. An example of this is our ongoing work to update meeting rooms with assistive technology, allowing connectivity with Microsoft Teams for live captioning and ensuring a consistent experience across all rooms. The visual office directory provides details on meeting rooms and technology available in each room.

Microsoft accessibility tools and Grammarly are also accessible and available to all employees. BCI continues to explore and pilot AI powered technologies to drive productivity and accessibility.

As part of our overarching accommodations process, BCI is committed to providing effective IT accommodations and assistive technology. Our accommodations team works closely with the larger BCI Information Technology function to respond to assistive technology requests.

### Barriers

Similar to BCI's overarching accommodations process, there is a lack of formalized documentation and communication regarding the existing IT accommodations process. This may result in employees being unsure of how to make non-standard software, assistive technology, or other IT accommodation requests. This barrier is heightened by user experience issues with the self-serve portal, which may deter employees from submitting requests for technology-based accommodations support.

There is limited communication and awareness surrounding accessibility tools and resources available, including Microsoft accessibility tools.

In BCI offices, the technology available in each meeting room can vary creating barriers to accessibility for those requiring assistive technology. Streamlining the technology across meeting rooms will ensure everyone has the tools needed to participate in all meetings.

While we consider accessibility in the development and procurement of new information technology, we have not yet assessed how the accessibility of existing technology we use can be improved.

### Priorities

**Priority #4:** Working within our existing IT platform we will develop a process for accessibility and accommodation requests.

**Priority #5:** We will assess our existing technologies, including our AI-powered accessibility tools and Microsoft Teams capabilities, and consider how accessibility can be improved and streamlined across our digital platforms and our offices.

**Priority #6:** We will assess accessibility in the procurement decision-making process with respect to new technology across our business. Consideration for accessibility is a shared responsibility between our IT function, Workplace Services and line(s) of business.

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## Communications

### Strengths

We strive to be inclusive and accessible in all our communications. For all corporate-wide meetings, such as Town Halls and knowledge sharing events, we publish recordings with verified closed captioning and have transcripts of the dialogue available.

Throughout BCI's equity, diversity and inclusion journey, we have held various events and activities for our employees with opportunities to better understand the experiences of those living with disabilities. These have included employee storytelling, external speakers, and workshops on inclusive language, effective communication, and unconscious bias.

To enhance the accessibility of our public-facing website, we are undergoing an accessibility audit to identify areas of improvement and reduce barriers to the information we communicate.

### Barriers

While we strive to be inclusive and accessible in all our corporate, client, and employee communications, we recognize there are opportunities to apply a more deliberate accessibility lens. Specifically, there is a need to more clearly communicate BCI's accessibility policies, commitments and resources to employees, job applicants, clients, and suppliers.

We also recognize that our public facing website does not currently conform with Web Content Accessibility Guidelines (WCAG) , which may result in barriers for persons with disabilities. With website updates planned, we are actively working with our IT functions and suppliers to enhance accessibility and create a user-friendly experience.

We have made efforts to increase the accessibility of company and department-wide meetings, but there are additional efforts needed, including developing an internal process to respond to alternate format requests so they can be provided in a timely manner.

### Priorities

**Priority #7:** As part of a current corporate project, we are in the process of onboarding a new corporate-wide intranet platform that conforms with WCAG. Within the project's scope we are developing internal writing guidelines (including accessible language e.g., active voice, subheadings, clear and concise messaging guidelines) and standardized templates for articles and evergreen content, (including font size, contrast, length etc.).

**Priority #8:** As part of planned updates, we will enhance the accessibility of our public-facing website by testing against web content accessibility guidelines and addressing gaps under our control.

**Priority #9:** We will provide employees responsible for corporate communications using corporate channels with guidance for leading practices on accessible communication (e.g., active tense, early message communication, etc.). Guidance will include a standardized accessible template for corporate communications (e.g., font size, contrast, length, etc.). This guidance will be used to communicate accessibility policies, commitments, and resources to employees. In support of this, we will explore expanding our accessible communication resources, including plain language writing, braille, large print and sign language interpretation.

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## Procurement

### Strengths

BCI procures a variety of goods and services, such as professional services, office supplies, catering services, training and development, technology and security support. Our procurement team is keen to begin advancing accessibility within the procurement function.

### Barriers

We recognize that there are barriers and opportunities to advance accessibility within our broader procurement activities. For example, we have not yet formally implemented consistent accessibility evaluation criteria within procurement of key goods and services (e.g., IT, communications, etc.), nor proactively shared accommodations processes and accessibility contacts with suppliers. Further, there is an opportunity to review our procurement templates, contracts and other documents with an accessibility lens, to ensure alignment with digital and communication accessibility leading practices and communication of accessibility expectations to suppliers.

We do not currently collect information on our suppliers' diversity (e.g., person with disability owned supplier, etc.) and equity, diversity and inclusion practices, nor do we have a formalized supplier diversity program in place. This presents an opportunity as BCI moves forward in its equity, diversity, inclusion and accessibility journey.

### Priorities

**Priority #10:** We will consider accessibility in the procurement decision-making process where relevant (e.g., IT, built environment, communications). Consideration for accessibility in procurement is a shared responsibility between procurement, IT function, Workplace Services and line(s) of business etc.

**Priority #11:** We will review BCI's existing procurement templates for accessibility, including supporting a supplier accommodations process.

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## Monitoring and Evaluation

To ensure we are progressing on our identified priorities, we will establish measures of success and evaluate progress in efforts detailed in our Accessibility Plan. We will review and action, as required, feedback that we receive on accessibility at BCI and on our Plan. With regards to evaluation of the Plan's effectiveness, we will review actions taken in support of our priorities with our Accessibility Committee, to assess implementation and impact at BCI. With our collective commitment, we can work together to make BCI a more accessible and inclusive organization.