

GUIDANCE ON SHARED PLANNING AND REPORTING DOCUMENTS

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SHARED PLANNING AND REPORTING DOCUMENTS

In some situations, organizations may be able to work together to meet the requirements of the Accessible Canada Act (ACA) and the Accessible Canada Regulations (Regulations) regarding:

- Accessibility plans
- Descriptions of feedback processes
- Progress reports

Organizations may be able to develop shared planning and reporting documents if they share the same or have similar policies, programs, practices and services for their clients, employees and others who deal with them.

Such organizations will be closely related. For example, they may be part of the same corporate family. A corporate family exists when a company (a parent company) controls and owns shares in another company or companies (subsidiaries).

Additionally, federal government organizations may be closely related. This may be the case if, for example, they report to Parliament through the same Minister, form part of the same departmental legislative framework, or are a subsidiary of a Crown corporation.

Joint or common plans will not be appropriate for organizations that are only superficially related or where each organization carries out distinct and unrelated functions, resulting in limited overlap between their policies, programs, practices, and services.

Organizations that publish shared planning and reporting documents are individually responsible for:

- Meeting all the requirements in the ACA and the Regulations (including <u>notifying the</u>
 <u>Accessibility Commissioner</u>) as they relate to their individual organizations;
- Demonstrating their own compliance with these requirements; and
- Participating in inspections to verify their own compliance.

Shared planning and reporting documents must mention each organization to whom they apply. The documents must address policies, programs, practices and services that are common to all the organizations, and those that are unique to any of the organizations.

When preparing a shared accessibility plan, organizations should be guided by the purpose of the ACA. That means they should identify barriers that currently exist within each organization, to set out the benchmarks or steps to be taken to remove these barriers so each organization's progress in implementing the plan can be measured, and to ensure new barriers are not created. Therefore, while there may be efficiencies in preparing shared accessibility plans where organizations are closely related, shared plans must nonetheless be comprehensive and clearly identify the specific barriers relating to the policies, programs, practices and services of each organization and how these will be removed.

A shared feedback process can name the same person to be responsible for receiving feedback for a group of organizations. Shared progress reports must address feedback received about each of the organizations in the group.

Organizations can publish their shared planning and reporting documents on the same webpage or website only if the organizations use these same digital platforms to communicate with the public.

Notifying the Accessibility Commissioner

Each organization must notify the Accessibility Commissioner individually when it publishes a shared planning and reporting document. Organizations can send their notifications through My Accessibility Portal. Organizations that publish their shared documents on the same webpage or website can include the same URL addresses in their notifications.

Organizations should also email info.com@chrc-ccdp.gc.ca to let the Accessibility Commissioner know that they are publishing a shared planning and reporting document.

Another option: Joint consultations

Organizations may also decide to consult people with disabilities together about their individual or their shared planning and reporting documents. Organizations that hold joint consultations should mention this in their accessibility plans and progress reports. In addition to all the other required information, they should list all the organizations that collaborated on the consultations.

Upon inspection, each organization must be able to demonstrate that the joint consultation was relevant to their own policies, programs, practices and services, and as above, demonstrating their own compliance with these requirements.