



**The St. Lawrence
Seaway Management
Corporation**

**Corporation de Gestion
de la Voie Maritime
du Saint-Laurent**

Accessibility Plan

June 1, 2023

The St. Lawrence Seaway Management Corporation

Summary

The St. Lawrence Seaway Management Corporation (SLSMC) is responsible for managing vessel traffic that travels through the Canadian waters of the St. Lawrence Seaway. The binational St. Lawrence Seaway's 15 locks (13 Canadian and 2 American) connect the lower St. Lawrence River to the Great Lakes, enabling ships to transit between Montreal and Lake Erie, a difference in elevation of 168 metres.

Our interactions are mainly with stakeholders of the shipping community who transport goods through the Seaway. Sometimes the public will interact with us as they transit their pleasure craft through the Seaway locks or if they visit our website for more information about the Seaway. We also interact with governmental agencies when discussing matters involving our shared waterway resource.

To build this plan, we thought about how we could improve accessibility in different aspects of the SLSMC. The seven different areas we considered are:

- The Built Environment
- Employment
- Information and Communication Technologies
- Communications
- Programs and Services
- Procurement
- Transportation

In each of these areas we looked for barriers to accessibility and thought about how we could fix those barriers, some of which are already being addressed through our Employment Equity Action Plan.

We also asked for feedback from people with disabilities. We sent a survey to our employees and asked them to share feedback about accessibility at our workplace. We

also held a focus group of people with disabilities who gave us feedback about our website, social media, and hiring practices. This information helped us to learn about barriers and helped us to decide what should go into our accessibility plan.

Our Accessibility Plan Actions

We plan to improve accessibility at the SLSMC by taking the following actions:

- Train all employees about disability, accessibility, and accommodation.
- Consider accessibility any time we build, renovate, or acquire a new location.
- Make changes to our current office spaces to make them more accessible.
- Review our emergency evacuation plans to make sure they have instructions for people with disabilities.
- Give managers training about accommodations for employees with disabilities.
- Make sure that managers are held accountable for having an equitable workplace.
- Train relevant employees on how to support people with disabilities during the hiring and recruitment process.
- Make sure that people with disabilities don't experience barriers that might lead to them being fired.
- Develop a plan to recruit more employees with disabilities.
- Update our career website (where people can apply to jobs) with a new version that is more accessible.
- Update our intranet (internal website only used by employees) with a new version that is more accessible.
- Make changes to our main public website to make it more accessible.
- Create guidelines for how to run accessible meetings and share these guidelines with all employees.

- Create public documents in accessible formats and share information with employees about how to create accessible documents.
- Make sure any videos we create have captions.
- Give information to employees about how to create accessible social media posts.
- Create information for employees about how to make sure the goods and services they are buying (procurement) are as accessible as possible.

Feedback | Correspondence Management

We are open to feedback on our plan and about accessibility at the St. Lawrence Seaway Management Corporation. You can give us your feedback by:

Email: accessible@seaway.ca

Mail: Head office

202 Pitt Street, Cornwall ON, K6J 3P7

Attention: Manager of Government and Community Relations

Phone: 613-932-5170, press “4” for accessibility

Online: Visit the “[Contact Us](#)” page of our website. Using the feedback form, select “Accessibility” from the dropdown menu.

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General

1.1 Statement of Commitment

The SLSMC is pleased to share its accessibility plan with the public. This plan was developed in consultation with employees and other Canadians with disabilities. We are firmly committed to this plan and to making changes that will improve our accessibility. Our accessibility plan is ambitious, but we believe these changes are necessary and will contribute to the full and equal participation of people with disabilities.

1.2 Contact Information & Feedback Process

The SLSMC welcomes feedback, including feedback submitted anonymously, from our employees, customers, and members of the public about accessibility at the SLSMC and this plan. We will review the feedback we receive in good faith and take steps to address barriers identified through this feedback.

You can submit feedback about accessibility at the SLSMC or this plan by:

Email: accessible@seaway.ca

Mail: Head office

202 Pitt Street, Cornwall ON, K6J 3P7

Attention: Manager of Government and Community Relations

Phone: 613-932-5170, press “4” for accessibility

Online: Visit the “[Contact Us](#)” page of our website. Using the feedback form, select “Accessibility” from the dropdown menu.

We will acknowledge the receipt of any feedback that is not submitted anonymously. Your feedback will help inform the development of future accessibility plans.

1.3 Alternative Formats of this Plan

You can request alternative formats of this plan by contacting the SLSMC:

Email: accessible@seaway.ca

Mail: Head office. 202 Pitt Street, Cornwall ON, K6J 3P7

Attention: Manager of Government and Community Relations

An electronic version (that is compatible with assistive technology) of this plan can be downloaded immediately from our website at: <https://greatlakes-seaway.com/en/about-us/slsmc-management/slsmc-accessibility-plan/>.

The SLSMC will provide the following alternative formats within 15 days of the initial request:

- Print
- Large print (Increased font size)

The SLSMC will provide the following alternative formats within 45 days of the initial request:

- Braille (a system of raised dots that people who are blind or who have low vision can read with their fingers)
- Audio (a recording of someone reading the text out loud)

1.4 Definitions

The following definitions apply throughout this plan:

Disability: Any impairment, or difference in physical, mental, intellectual, cognitive, learning, or communication ability. Disabilities can be permanent, temporary, or can change over time.

Barrier: Anything that might hinder the full and equal participation of people with disabilities. Barriers can be architectural, technological, attitudinal, based on information or communications, or can be the result of a policy or procedure.

Accessibility: The design of products, devices, services, environments, technologies, policies and rules in a way that allows all people, including people with a variety of disabilities, to access them.

1.5 Description of the St. Lawrence Seaway Management Corporation

The SLSMC is responsible for the safe, efficient, and environmentally friendly management of marine traffic through the Canadian waters of the St. Lawrence Seaway. We are also responsible for operating, managing, and maintaining a system of moveable bridges and locks throughout the Seaway. The binational St. Lawrence Seaway's 15 locks (13 Canadian and 2 American) connect the lower St. Lawrence River to the Great Lakes, enabling ships to transit between Montreal and Lake Erie, a difference in elevation of 168 metres.

The SLSMC has locations in Quebec and Ontario. The SLSMC interacts with various stakeholders in the domestic and international shipping industries. Members of the public may interact with the SLSMC if they transit their pleasure craft in the St. Lawrence Seaway, use one of their bridges, or visit the SLSMC LinkedIn and careers pages. The SLSMC also interacts with governmental agencies when discussing matters involving our shared waterway resource.

As outlined in section 78 of the Canada Marine Act, one of the Seaway's objectives is to protect the rights and interests of adjacent communities.

2 Areas Described under Section 5 of the ACA

2.1 Organization-Wide Initiatives

The SLSMC is committed to organization-wide training on accessibility. This will help us to make sure that all our employees understand what accessibility means and why it is important. It will also help everyone to understand what accommodations are and their purpose. We learned through our employee consultations that there is an appetite to learn more about disability and accessibility in general and how to make our organization more inclusive to people with disabilities. Training our employees in this way will help us improve accessibility in all aspects of our operations. Our goal related to organization-wide training is as follows:

Goal(s)

- By March of 2024, the SLSMC will train our employees on disability, accessibility, and accommodation.

2.2 The Built Environment

Accessibility of the built environment has a significant impact on whether people with disabilities can access and function within a space in an equitable way. The SLSMC has multiple sites across two provinces where it conducts its business. These sites include offices in Saint-Lambert and Brossard, Quebec; Cornwall, Iroquois and St. Catharines, Ontario.

Currently, none of the SLSMC's sites are fully accessible. Many of our sites were constructed in the 1950s and 1960s. We have made some accessibility improvements, such as installing elevators, creating signage, and purchasing ergonomic office furniture. There are some aspects of our current built environments that would be impractical or impossible to make fully accessible to all people. We are committed to making all new construction as accessible as possible. Our goals for improving the accessibility of the built environment at the SLSMC are as follows:

Goal(s)

- Starting immediately, the SLSMC will make sure accessibility is an important consideration any time we do a major renovation or build a new site.
- By June of 2025, the SLSMC will conduct a review of our emergency evacuation plans. In that review, we will make sure that all our plans include information about how people with disabilities should participate in emergencies and evacuations.
- By June of 2025, the SLSMC will implement upgrades to the accessibility of our existing locations. When not already in place, these upgrades will include:
 - Improving signage for our accessible parking spaces
 - Increasing colour contrast for doors and other objects
- By June of 2027, The SLSMC will implement other upgrades, which may include:
 - Installing automatic door openers on doors in office spaces.
 - Improving accessibility to our office spaces with the use of ramps.

2.3 Employment

The SLSMC employs just under 500 employees. Some employees work seasonally as the Seaway is only open to marine traffic in spring, summer, and fall. The SLSMC employs people in jobs that range from office administration to engineering and operations. A lot of work performed by maintenance employees is physical labour and includes activities like welding, machining, infrastructure repair, and lock maintenance work. Since 2020 some employees have been working in a hybrid model, with some work being done virtually or from home, where appropriate.

We respond in a timely manner to all requests for accommodation, and we try to remove barriers to accessibility whenever we learn about them. Still, we received feedback related to the accommodations process that it is not well defined and that

employees are sometimes unsure of how to access it properly. We will focus on making changes in this area.

The Corporation built a 3-year Employee Equity Plan that spans the years 2022-2025. Many of the goals in our 3-year Employee Equity plan are shared with this Accessibility Plan. Over the last year, we have taken steps to help make sure that our workplace is accessible and welcoming for people with disabilities. The steps we have already taken are:

- We have reviewed our hiring process to make sure that new employees feel comfortable disclosing if they have a disability.
- Created a plan to make sure that we have more diverse images and stories in our newsletter, posters and other materials.
- Made sure that our recruitment and hiring communications have messaging about diversity.
- Include a statement about reasonable accommodations on all job postings.

Our goals for improving the accessibility of employment at the SLSMC are as follows:

Goal(s)

- By March 2024, the SLSMC will make sure that all managers and people who support accommodations receive training on the process, reason for, and legal duty to accommodate.
- By March 2024, the SLSMC will set up a framework to make sure that managers are held accountable for equity initiatives and for maintaining an equitable workplace.
- By March 2024, the SLSMC will develop or purchase training about how to support people with disabilities through the recruitment and hiring process. We will make sure that all our relevant employees who work in recruitment participate in this training.

- By March 2024, we will review any planned terminations (when an employee is let go from the job) to see if there are factors that might be impacting people with disabilities more than other employees. If we find that some of our practices are unequal, we will take steps to change them.
- By March 2025, the SLSMC will develop a plan to engage in targeted recruitment of people with disabilities. This may involve partnering with community organizations and attending job fairs for people with disabilities. We hope that this will result in us hiring more people with disabilities in the future.
- By June 2025, the SLSMC will conduct a review of our job postings. In this review, we will make sure that the listed requirements are true to the specific position and that we are not accidentally excluding people with disabilities.

2.4 Information and Communication Technologies (ICT)

We conducted a review of our IT systems to see how accessible they are. We found that many of the products we use have a good basis for accessibility and only minor barriers existed. For example, our public-facing website has some navigational barriers that can be easily remedied. Many people with disabilities gave us feedback that overall, the website is easy for them to use and navigate. Our goals for improving the accessibility of information and communication technologies at the SLSMC are as follows:

- By June 2025, the SLSMC will replace its intranet site (a website used by our employees). The new intranet site will be designed to be as accessible as possible for all users.
- By June 2025, the SLSMC will make minor updates to our public facing website to improve the accessibility of that site. Some of these changes include:
 - Making sure that headings are coded correctly.
 - Making sure that all sections of the website can be accessed using only a keyboard.

- Making sure that all images have alternative text.

2.5 Communication, other than Information and Communication Technologies

Our communications team has created a robust writing and style guide that includes information about how to make documents and texts accessible to people with various disabilities. We are committed to making sure we keep this guide up to date and to sharing the information with all employees. We are also committed to making sure our documents, videos, meetings, and social media accounts are accessible to all people. Our goals to improve the accessibility of communications are:

Goal(s)

- By June 2025, the SLSMC will create a set of standards for accessible internal meetings and will distribute those guidelines to all employees. These guidelines will include suggestions such as:
 - Making sure that materials are sent in advance of meetings.
 - Making sure that automatic captions are turned on in virtual platforms, when feature is available.
 - Asking people to turn on cameras when they are speaking.
- By June 2026, we will make sure that all the external documents we create and distribute are published in accessible formats. External documents refer to documents that will be seen by people other than our employees (for example, the general public, ship captains etc.). We will take steps to make sure PDF documents are accessible.
- By December 2023, we will distribute the communication and style guide (which includes information about accessibility) to all employees. We will update that style guide if we learn new information about best practices for accessibility in communications.

- Starting in June 2025, any videos that the SLSMC creates will have accompanying captions. For any videos that we don't create, but we chose to publish or distribute, we will provide a written transcript of the information in the video where no captions are available.
- By June 2024, the SLSMC will create an "accessible social media" tip sheet and will distribute this tip sheet to all employees who work with our social media accounts. This tip sheet may include:
 - Instructions for how to write alternative text for images
 - Instructions for using camel case hashtags (which is when you capitalize the first letter of each word, for example #StLawrenceSeaway)

2.6 Procurement of Goods, Services and Facilities

Procurement refers to the process we undertake to buy goods, services, and facilities. Accessibility is not currently a major consideration in procurement at the SLSMC, however we are dedicated to making changes in this area. Our first steps to making sure that our procurement process is accessible will involve generating and sharing knowledge throughout our workforce about how accessibility should be considered during the procurement process. Our goal to improve the accessibility of the procurement process is:

Goal(s)

- By June of 2026, the SLSMC will create resources to help us make sure that the goods and services we buy (procurement) are as accessible as possible. We will design checklists and information for employees at the SLSMC to help them determine when and how they should consider accessibility when purchasing a new product or service.

2.7 Delivery of Programs and Services

Our programs and services mostly relate to the operation and maintenance of the locks and bridges in the St. Lawrence Seaway, as well as the management of ship traffic. The

services we provide to people includes information sharing with the general public, and direct communication through our website/customer services team for commercial shipping customers and pleasure craft users. Accessibility improvements that we will make to our communications practices, and our information communication technology, will help improve the accessibility of our programs and services.

We are committed to accepting feedback about the accessibility of our programs and services. We will make changes to our programs and services, as appropriate, as we receive feedback from the public and our customers.

2.8 Transportation

We do not provide transportation for passengers at the SLSMC, so we do not have any accessibility goals for this area.

3 Consultations

The following sections of this plan outline how people with disabilities were consulted in the preparation of this plan. However, we recognize that consultations need to be ongoing, and we are dedicated to building relationships of trust with people who have disabilities to engage in effective consultations going forward.

We undertook consultations with employees with disabilities in the form of an anonymous online survey that was shared with all employees in both official languages. In the survey, we asked employees with disabilities to share their experience of barriers to accessibility at the SLSMC. We also invited employees who do not have disabilities to share any feedback they might have about things they have observed. Most of the feedback we received through the survey was about the accessibility of our built environment.

We also held a focus group with people who have a variety of disabilities. These people are not employees of the SLSMC, but they represent people who may interact with us or who may apply to work for us. We asked them to review our complaint filing process,

our website, our social media platforms, and asked them to try and contact the SLSMC. The most common feedback we received was that our website is slightly difficult to navigate for people using screen readers, that our careers website is not accessible and that our news releases are often published in non-accessible PDF format. The feedback from our employees and from this focus group helped us create the accessibility goals in this plan.

4 Conclusion

Through this accessibility plan, we aim to improve accessibility at the SLSMC. We are dedicated to addressing current barriers and preventing barriers from arising in the future. This plan is a living document and will be reviewed regularly to ensure that we are staying on track to meeting our goals. We will continue to engage in meaningful consultation with people who have disabilities to help us inform the direction of our accessibility initiatives and future accessibility plans.