Canadian Heritage Accessibility Plan 2023-2025

General

Provide feedback or contact us

For more information, to provide feedback, to get a description of our feedback process or to request alternate formats of this Plan, you can contact:

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Free Video Relay Service (VRS Canada) or TTY at 1-888-997-3123 (for people who are deaf, hard of hearing or speech impaired)

You can also provide feedback on this plan online.

Other formats

American Sign Language (ASL) version of this Plan.

Langue des signes québécoise (LSQ) version of this Plan.

Contact us to request other alternate formats of this Plan such as large print, Braille, or audio.

Message from our Deputy Ministers and Accessibility Champion

We are proud to introduce our first departmental Accessibility Plan, an important part of our work to implement the *Accessible Canada Act*, which came into force in 2019.

Canadian Heritage is strongly committed to contribute to a barrier-free Canada. The Plan marks an important step in our work to identify, prevent and remove barriers for persons with disabilities. It is our guide to become a model of accessibility in the public service.

We would like to thank everyone who was involved in this plan, including the Advisory Committee on (Dis) Ability.

At the heart of our plan is the belief that accessibility is a human right and therefore, everyone's business. This means that we need a paradigm shift from focusing on the inability of an individual to engage with their environment to the need of environments to be inclusive of all abilities.

We expect all Canadian Heritage managers and employees to commit to:

1. Respecting this right for all our employees and Canadians
2. Removing barriers to accessibility
3. Taking a "Nothing Without Us" approach to involve colleagues and Canadians with disabilities in everything we do
4. Celebrating the contributions of persons with disabilities

Together, we can address the barriers to accessibility that are not only physical, but also systemic, cultural, and societal.

Each one of us shares a responsibility to embody the values and spirit of the Plan. We must work together to create a respectful and inclusive culture at all levels. This means a department where everyone is empowered to achieve their full potential and supporting programs and services accessible to all Canadians.

Our future is accessible; we count on your creativity and contributions!

Isabelle Mondou, Deputy Minister, Canadian Heritage

Mala Khanna, Associate Deputy Minister, Canadian Heritage

Charles Slowey, Assistant Deputy Minister and Accessibility Champion, Canadian Heritage

Introduction

Approximately 6.2 million Canadians aged 15 years and over have 1 or more disabilities. In fact, most Canadians (81%) will experience 2 or more types of disability in their lives. Disability is a reality in our lives and is a complex concept. It is used to describe a diverse set of circumstances and experiences.

Contact the Accessibility Office for more information on disability in Canada.

Canadians embrace diversity by celebrating many races, ethnicities, cultures, gender identities, languages, and religions. Disability is another way that people live, view, experience and express themselves differently.

In this context, the Government of Canada passed the *Accessible Canada Act* (ACA) in 2019. It is an important piece of Canada's human rights framework. The ACA benefits all Canadians, especially those living with a disability. It also brings an important shift in how society views disability:

> "Canadians should no longer focus on the inability of individuals to engage with their environment. Instead, they should focus on the inability of environments to be inclusive of all abilities. For federal organizations, this means breaking down barriers to be fully inclusive of all Canadians, including those with disabilities."

The Act's goal is a fully accessible Canada by 2040. This imposes many requirements in the interim. By 2022-2023, federally regulated entities must:

- prepare and publish an initial multi-year accessibility plan
- establish an accessibility feedback process
- report annually on the progress made to improve accessibility and to address the feedback received

Contact the Accessibility Office for more details on why we need the ACA.

Canadian Heritage has an essential role in making Canada's public service the most accessible and inclusive in the world. This Plan outlines how we will identify, remove, and prevent barriers in the following priority areas:

1. Recruitment, retention, and promotion of persons with disabilities
2. Built environment
3. Information and communications technologies (ICT)
4. Communications
5. Procurement
6. Design and delivery of programs and services
7. Culture change toward disability inclusion

Transportation is also a priority. It refers to the federally regulated transportation network and only applies to entities that must comply under the *Canada Transportation Act.* As such, it is not applicable to Canadian Heritage .

Canadian Heritage's Accessibility Plan 2023-2025 is an important milestone. It is the first step in our journey to create a fully accessible department for our employees and for all Canadians.

Canadian Heritage at a glance

Our department and its portfolio organizations play a vital role in the cultural, civic, and economic life of Canadians. Arts, culture, and heritage contribute more than $57 billion to the Canadian economy. They represent more than 670,000 jobs in sectors such as cultural industries, the arts, sports, official languages, Indigenous languages, diversity and inclusion, as well as youth.

Canadian Heritage has close to 1,800 employees across Canada and has 5 core responsibilities:

1. Creativity, arts, and culture
2. Heritage and celebration
3. Sport
4. Diversity and inclusion
5. Official languages

The portfolio includes 3 departmental agencies, 11 Crown corporations, and 2 administrative tribunals.

Statement of commitment

Canadian Heritage commits to providing fair treatment and opportunities to people with disabilities. This means providing barrier-free access to our:

- work environment,
- programs,
- services,
- jobs,
- goods, and
- facilities.

For our employees and all Canadians, we will do this in a manner that respects their dignity and independence.

Our department has a mandate to advance diversity, equity, and social inclusion. As such, we have an important role in promoting inclusion in the workplace and in services to Canadians. Disability cuts across many identity factors. Thus, we promote an intersectional analysis and the comprehensive concept of IDEA (Inclusion, Diversity, Equity and Accessibility).

We have developed and commit to implementing this Plan according to the following principles:

- From diversity, including fair representation of people with disabilities, comes our strength
- Everyone must be treated with dignity
- Everyone must have the same opportunity to create the life they are able to and wish to have
- Everyone must be able to participate fully and equally in society and in work environments
- Everyone must have meaningful options and be free to make their own choices, with support if they wish (i.e., accommodation measures)
- Laws, policies, programs, services, and structures must consider the ways that different kinds of barriers and discrimination intersect
- All employees adhere to the "Nothing without Us'' principle. This means involving people with disabilities in every stage of all laws, policies, programs, or services, which impact them. This includes design, planning, review, monitoring, and implementation
- We will build accessibility in at the forefront of any initiative
- Accessibility benefits everyone
- There is a wide range of disabilities. Each person with a disability has unique needs. Accessibility is about being inclusive of all needs.
- All employees must remain aware of accessibility best practices, tools, laws, regulations and standards

Engagement and consultations in the spirit of Nothing without Us

The Canadian Heritage Accessibility Office led extensive engagement and consultations to develop this Plan. The Office worked with the department's Advisory Committee on (Dis) Ability and internal networks. These networks include employees with disabilities and their allies.

We engaged and consulted groups through various stages of development. Groups included employees, sector leads, management tables, several departmental committees, and executive committees. We also consulted experts such as the Bob Fern Centre for Accommodations.

In 2020-21, we created two internal working groups to guide this work:
- The Accessible Programs and Service Design and Delivery Working Group
- The Accessible Information and Communications Technologies and Communications Working Group

The following specific engagements and consultations were held:
- Taking stock – An assessment of the current state of accessibility in the department. Results were based on interviews with 60 respondents at all levels.

- Consultations open to all employees, with support from the department's Innovation Laboratory. There were 426 participants. They identified barriers and solutions for each goal of the Plan.
- Targeted engagement with persons with disabilities, in collaboration with the department's Policy Research Group.
- Workshop on the design and delivery of accessible programs and services. This included participants from the department's Equity, Diversity and Inclusion Program Review and from the regions.
- Workshop on culture change and intersectionality. This involved co-chairs of all employee networks representing equity deserving groups.

Canadian Heritage's Advisory Committee on (Dis) Ability, in partnership with the Statistics Canada employees with disability network, is currently undertaking an employee led study on employment. Titled Engaging (Dis) Ability Innovation Research Study, it describes how employees with health conditions, impairments and/or disabilities experience recruitment, retention, promotion and workplace accommodation practices.

It is the first ever study by employees with disabilities for employees with disabilities in the Government of Canada. This study involved employees with disabilities in its design and implementation. Thus, it truly exemplifies the concept of "Nothing Without Us." This research is generating new and important insights which will inform our department's work on accessibility.

[Contact the Accessibility Office for a detailed listing of all engagements and consultations for this Plan.](#)

What we heard

The views, insights and input from the engagement and consultations was invaluable to the development of this Plan. Participants with and without lived experience shared real-life barriers to accessibility and disability inclusion. They shared their perspectives on where they thought the department was making progress in removing these barriers. Many agreed that there has been progress. However, they made important suggestions on solutions for the organization.

The main messages are:

- Culture and attitudinal changes are needed
- Accessibility means removing barriers for all forms of disability
- Invisible disabilities are real disabilities
- Disability inclusion means more than providing accommodations
- Apply an intersectionality lens more fully to accessibility needs
- Improve communications and implement mandatory accessibility training for all employees
- Gather data to better understand who Canadian Heritage is reaching or excluding from its programs and services

- Embrace the principle of Nothing Without Us
- Remove physical barriers in the built environment
- Employ persons with disabilities and support them to reach their full potential

[Contact the Accessibility Office for a detailed summary of what we heard from all engagement and consultations for this Plan](#).

Engagement and consultations going forward

We commit to continue engagement and consultation throughout the implementation of the Plan. This applies both internally and externally. This will help us improve the accessibility of our organization and of our programs and services.

For future external consultations, we will explore ways to collaborate within the Canadian Heritage portfolio and with other government departments on areas of common interest.

Indigenous people experience a disability rate higher than that of the general population. With this in mind, the Accessibility Office will prioritize further consultations with Indigenous people. As part of the journey to Reconciliation, we commit to creating culturally appropriate and distinctions-based services and spaces. Through this, we aim to advance the inclusion of persons with disabilities within First Nations, Inuit, and Métis communities.

The Accessibility Office will also continue to work with equity deserving employee networks. These include Black, racialized, religious and LGBTQ2S+ groups. We strive to better understand the experiences of people with disabilities who belong to equity-seeking groups. This way, we can aim to make the Plan as inclusive as possible.

Accessibility Governance at Canadian Heritage

Our Deputy Minister will monitor and report on Canadian Heritage's Accessibility Plan to Canada's Accessibility Commissioner. The following structure has been put in place to support the Deputy Minister in meeting this accountability:

- **Assistant Deputy Minister Champion for Accessibility**

- **Accessibility Office.** It is responsible to support Canadian Heritage efforts to:
  - implement the *Accessible Canada Act*
  - reduce barriers to accessibility and disability inclusion
  - raise awareness
  - engage with persons with disabilities

  It also acts as a centre of expertise to increase knowledge in accessibility in our department.

- **Seven pillar leads**, senior executives responsible for each of the Plan priorities. Pillar leads are responsible for:
  - making their business functions accessible to employees and/or Canadians with disabilities
  - implementing actions in the Plan related to their roles and responsibilities
  - reporting on progress being made in their area of accountability

- The Bob Fern **Centre for Accommodations**

- Employee led **Advisory Committee on (Dis) Ability**

- **The Workplace Well-Being Tiger Team**
  - Leads strategies to support the well-being of all employees, including those with invisible disabilities

The following committees form part of the department's formal governance structure. They are involved in the development and approval of the Plan:
- Level 2 Inclusion, Diversity, Equity and Accessibility (IDEA) Committee
- Level 1 Inclusion, Diversity, Equity and Accessibility (IDEA) Advisory Committee
- Canadian Heritage Executive Committee

Canadian Heritage Action Plan

This Plan outlines how Canadian Heritage will meet its obligations under the *Accessible Canada Act*. The Plan is based on two main components. It is centered on the foundational work of the department's Accessibility Framework released in 2021.

It builds upon extensive engagement and consultations over the past two years. The Plan also builds on the progress and actions undertaken under each pillar over the last two years. For a summary of these actions, contact the Accessibility Office.

Over the next three years, Canadian Heritage will focus on actions under the following seven pillars:
1. Employment
2. Make our built environment accessible
3. Information and Communication Technologies (ICT)
4. Accessible Communications
5. Accessible procurement of goods, services and facilities
6. Design and deliver barrier-free programs and services
7. Culture change

Pillar 1: Employment

"Persons with disabilities are the most creative and innovative people I know. We spend our entire lives problem solving. So, the fact that persons with disabilities still remain underemployed means the Canadian economy is missing out."

Minister of Employment, Workforce Development and Disability Inclusion,
Carla Qualtrough

For employment, Canadian Heritage's lead is the Director General of Human Resources and Workplace Management Branch.

Background

All Canadians should be able to make choices about their livelihood based on their skills, interests, and economic goals. Prejudice and discrimination prevent many people with disabilities from accessing the labor market.

In Canada:

- About 39% of people think employment is the most important area in which to improve accessibility
- In 2017, 645,000 people with disabilities who were ready to work were unemployed

Including people with disabilities in our work environments is the right thing to do. It also makes good business sense. Organizations that develop an equity, diversity, and inclusion (EDI) approach experience many benefits. These include higher rates of talent attraction, retention, innovation and above average profits.

In June 2022, Canadian Heritage had an important gap between workforce availability and representation of persons with disabilities. 6.4% of employees self-identified as persons with disabilities versus a rate of availability of 9.2%. Hiring and retention trends show that this will worsen without focused efforts.

Recruitment, retention and promotion of people with disabilities is not the sole responsibility of human resources. We should note that it is shared with everyone participating in hiring processes and all managers. Also, all colleagues have a role to play to ensure that all employees feel included and welcomed.

See the barriers and gaps for this pillar under Annex A.

Goals

1. To ensure that employment policies and practices are inclusive of people with disabilities

2. To improve the recruitment, retention, and promotion of people with disabilities within Canadian Heritage
3. To consult employees with disabilities

Action items

Sourcing candidates/recruitment

- Hire 61 new employees at Canadian Heritage who identify as people with disabilities by 2025 to close the gap between workforce availability and representation of persons with disabilities. This will contribute to the Government of Canada's goal to hire 5000 new employees with disabilities by 2025. At Canadian Heritage , we will focus on new hires and the executive level
- Develop a robust IDEA (Inclusion, Diversity, Equity and Accessibility) lens in our human resources planning. Apply this lens at the forefront of the staffing process
- Promote the students with disabilities program
- Hire students with disabilities after their studies
- Presence at job fairs/partnerships with associations for people with disabilities
- Executive staffing:
    - Selection board members to complete the mandatory training "Inclusive Hiring Practices for a Diverse Workforce''
    - Diversify selection boards to represent different perspectives
    - Review and rewrite merit criteria so that job postings match job descriptions
- Design accessible documents and assessment tools

Staffing process (new hires and promotions)
- Create a list of employees that can sit as evaluators on assessment boards. This will ensure that they are representative of equity deserving groups
- Leverage centrally managed accommodation fund to alleviate financial burden on Branches
- As this is a shared responsibility, ensure managers discuss accommodations with candidates. This conversation begins at the first interaction and continues throughout the on-boarding process
- Put in place a talent mobility tool to promote internal candidates with disabilities
- Use an intersectional approach to accessible employment by integrating Indigenous ways of thinking

Self-identification/self-declaration and data collection
- Collect and use disaggregated data when possible
- Revamp employment equity (EE) gap reports
- Conduct annual campaigns to promote and explain the benefits and limits of self-identification and of self-declaration. Campaigns should show progress and

benefits resulting from self-identification. In this way, we can foster trust with employment equity groups and with the department

- Treasury Board Secretariat has modernized the self-identification form. Its implementation is scheduled for fall 2022.
    - **Self-identification** is the term used to describe the collection of employment equity information voluntarily provided **by employees** for statistical purposes to enable Canadian Heritage to analyze and monitor progress on representation and to report to Parliament on the representativeness of the workforce.
    - **Self-declaration** is the term used by the Public Service Commission to refer to the collection of employment equity information voluntarily provided by **applicants to establish their eligibility for appointment processes.**

Attitudes and awareness
- Review our on-boarding approach with an inclusion, diversity, equity, accessibility, and reconciliation lens
- Improve onboarding experience for people with disabilities
- Integrate training about disability inclusion in the department's learning curriculum
- Ensure Canadian Heritage's competency requirements include those related to accessibility, accommodations, and disability inclusion
- Embed a commitment in managers and executives' performance management agreements. This commitment will be to create a healthy and inclusive work environment

Official languages learning and training
- Ensure greater access and funding for second language training for persons with disabilities
- Review of official languages requirements
- Explore possibilities of staffing with non-imperative bilingualism requirements
- Promote informal initiatives. Examples include Language Buddy or Coffee Chats targeted to persons with disabilities

Accommodation process
- Streamline and promote the accommodation process
- Ensure easy and quick access to accommodation measures. Use a non-intrusive approach that prioritizes stability
- Continue to implement the [Government of Canada Workplace Accessibility Passport](#) (new tool to improve the accommodation process across the federal

public service by documenting the barriers employees face and the measures they need to succeed in the workplace)

- Leverage a new library to borrow and test suitability of adaptive technologies before we procure permanent solutions
- Raise awareness with managers
- Address issues such as accommodation requests being delayed or denied. Move to a yes-by-default approach
- Develop a framework for service animals in the workplace

Strategic Planning

- Consult the Advisory Committee on (Dis) Ability and other disability stakeholders on workplace modernization and return to the workplace Plans
- Ensure representation of persons with disabilities in all new initiatives, including project planning. This includes executive tables, emergency and business continuity management initiatives, occupational health and safety, etc.

Harassment and violence prevention and resolution

- Fulfil harassment and violence prevention and resolution commitments to:
  - undertake more frequent campaigns towards harassment and violence prevention in the workplace
  - respond effectively to these incidents when they do occur
  - support affected employees in the resolution process
  - show more robust accountability (reports, actions undertaken)
- Do a workplace assessment. Identify internal and external risk factors that contribute to harassment and violence
- Establish preventive measures to reduce risk factors that contribute to harassment and violence
- Revamp emergency procedures to include harassment and violence
- Offer support measures such as the Employee Assistance Program to employees across Canada. Ensure that other services and support measures (psychological, medical, and emotional) are in place and can be accessed when needed
- Offer mandatory training to employees on harassment and violence prevention in the workplace. This includes Preventing Harassment and Violence in the Workplace for Employees through the Canada School of Public Service
- Review the format of the current mandatory training on harassment and violence prevention to make it more conducive to its goals. This may assist in increasing the number of employees who complete the training
- Report annually on harassment and violence prevention and resolution to Head of Compliance and Enforcement (Employment and Social Development Canada). Present reports at managerial tables to inform them of their role to intervene quickly should they see problematic behaviours

Indicators of success

The Human Resources and Workplace Management Branch will monitor and collect data to measure ongoing progress in the areas below.

- Increased representation and promotion rates of persons with disabilities. This includes more appointments through the talent mobility tool of persons with disabilities
- Improved integration of support for employees with disabilities into pre-existing career development programs
- Increased satisfaction and reduced average length for accommodation processes
- Canadian Heritage consults employees with disabilities at the forefront of all employment initiatives, policies, and processes
- Lower leave rates for employees with disabilities
- Increased hiring of students with disabilities, including bridging them into indeterminate positions
- Higher participation rate in the self-identification process
- Improved results of various surveys related to persons with disabilities (i.e., the Student Exit Survey, onboarding survey, departure feedback survey, Public Service Employee Survey, Staffing and Non-Partisanship Survey, etc.). In addition, monitor the state of organizational health through internal surveys
- Increased participation of employees in courses on disability and accessibility. The Canadian School of Public Service and other training providers offer these.
- Increased participation of persons with disabilities on hiring boards
- Increase in the number of persons with disabilities taking part in official languages initiatives
- Improved results from the Staffing and Non-Partisanship Survey about fairness, transparency, and merit
- Lower rates of employees with disabilities who face harassment and/or discrimination
- Monitor the effectiveness of preventive measures
- Employees with disabilities and other equity-seeking groups see Canadian Heritage as an employer of choice
- Managers have the tools, support, and resources they need to assist their employees with disabilities. This includes higher rates of completion for training on: Inclusive Hiring Practices for a Diverse Workforce
- Improved onboarding experience for employees with disabilities

In addition, the Human Resources Branch will contribute to a culture of disability inclusion. This includes applying an accessibility and disability inclusion lens in all employment initiatives, policies, and processes. For other action items related to culture change, please see the culture section of this Plan.

Pillar 2: Built environment

> "Inclusive design does not mean you are designing one thing for all people. You are designing a diversity of ways to participate so that everyone has a sense of belonging." Susan Goltsman, international expert in inclusive environments

For the built environment, Canadian Heritage's lead is the Director General of Human Resources and Workplace Management Branch.

Background

Employees and clients need barrier-free access to workspaces, boardrooms, and personal spaces. Built environments matter. We aim for an inclusive design solution so that most people, regardless of diverse abilities, preferences and needs, can use our spaces.

Many building codes and standards still fall short of creating optimal environments for persons with disabilities. We are working to adopt the new Government of Canada workplace standards. However, a one-size-fits all approach will not work for everyone. What may be ideal for one person may be completely inaccessible for another.

We will remain flexible and inclusive as it Plans renovations and a return to the workplace (hybrid model). Learning from experts in accessible built environments and from those with lived experience will be key.

Canadian Heritage is responsible for ensuring accessibility within its own environment. It is also working with Public Services and Procurement Canada (PSPC) as PSPC is the responsible authority for managing and providing departments with property and accommodation services.

See the barriers and gaps for this pillar under Annex A.

Goals

- Enhance the accessibility of our workspaces and built environment (owned and leased buildings)
- Make physical environments inclusive and safe for people with disabilities
- Contribute to a yes-by-default approach to accommodations

Action items

Accommodations

- Take part in the Accommodations Committee and support partners
- Respect standards for service dogs and support persons

- Pilot project to test co-working
- Encourage employees to get training on accessibility and best practices. This will promote better understanding of needs and speed up processes
- Provide more work locations outside of regular work environments
- Continue to identify new accessibility barriers as they arise

Interior spaces
- Confirm spaces are well ventilated and free of obstructions (i.e., wires, boxes). Spaces should allow for easy circulation, particularly for persons in wheelchairs
- Provide a variety of spaces to accommodate various needs and preferences, such as noise, lighting, spatial needs, etc.
- Work with partners to prevent and remove new accessibility barriers

Emergency measures
- Review emergency procedures with employees with disabilities. Ensure procedures comply with Accessibility Standards Canada's upcoming standard for emergency measures

Return to the workplace
- Return to the workplace plans must involve people with disabilities to take their needs into account (physical disabilities, mental health issues, learning and cognitive disabilities, etc.)
- Offer employees a hybrid work environment. This way, they can work from home or from an unassigned work environment if their operational tasks permit
- Provide employees with all accommodations needed, regardless of work location
- Implement safety measures to prevent the spread of COVID-19
- Remind employees who are experiencing anxiety and need support that resources are available

New Government of Canada Workplace (non-assigned workspaces)
- Increase the number and variety of ergonomic and accessible workspaces (new Government of Canada workplace standard). This includes:
  - Adjustable furniture, chairs, and lighting
- Offer a variety of spaces and closed rooms arranged in various ways for noise sensitivity, and/or collaboration
- Identify and pilot depersonalized workspaces
- Explore the creation of collaborative spaces for areas with smaller numbers of employees. Do this with accessibility in mind
- Implement newly modernised floors, including universal washrooms (accessible and gender neutral). Include emergency alarms in case one needs assistance
- Improve wayfinding

- Look into ways to incorporate more of nature into the work environment

Outdoor spaces

- Continue to work with partners to ensure timely sidewalk repairs and consistent snow and ice removal
- Clearly mark accessible drop-off points for all accessible transportation services at office building entrances
- Work with Public Services and Procurement Canada to ensure compliance with Accessibility Standards Canada's upcoming standard for outdoor spaces

Indicators of success

- Our return to the workplace practices embed disability inclusion and collaboration with employees with disabilities. This includes the hybrid by default model
- Emergency procedures to reflect the needs of employees with disabilities
- Immediately addressing and resolving new barriers in the built environment as they arise
- Quicker accommodations that follow a yes-by-default approach
- Clients and employees have barrier-free access to Canadian Heritage's buildings
- Regular reviews/visits of buildings with people with disabilities
- Inclusive design/consultations with employees with disabilities:
    o at the forefront of any new facility project
    o in the design of other initiatives related to the built environment
- All Canadian Heritage offices and buildings (National Capital Region and in the regions) meet or exceed accessibility codes and standards
- Employees from the Transformation, Real Property and Accommodation team are well-informed of best practices/accessibility standards related to the built environment
- Employees working from home have the equipment and tools they need to succeed at their jobs
- The mental and physical well-being of all employees is at the centre of all decisions about the workplace

Pillar 3: Information and Communication Technologies (ICT)

"ICT accessibility ensures that people with and without disabilities can access the same information, perform the same tasks, receive the same services using information technology… While ICT accessibility can provide usability benefits to everyone who uses ICT, it is a vital necessity to many people with disabilities."

-National Association of State Chief Information Officers (NASCIO)

For ICT, Canadian Heritage's lead is the Chief Information Officer (CIO).

Background

People with disabilities continue to face significant challenges to access and use Information and Communication Technologies(ICT).

Since 1999, federal departments apply accessibility standards to all external digital communications and services. The [Guideline on Making Information Technology Usable by All](#) to support the *Accessible Canada Act* (ACA) launched in June 2020. It helps departments consider accessibility when buying or developing Information Technology (IT) solutions and equipment. It prescribes the approach, methods, and standards we need to adapt to make sure everyone can use information technologies.

The ACA puts more emphasis on accessibility requirements. These now cover:
- internal information systems
- desktop software
- communications and computing devices
- digital outputs created with these platforms and tools

There is a target state for accessible Information and Communication Technologies in the Government of Canada. It is that clients and employees can access and use all information and communications technology regardless of ability or disability. As such, we will need to address current barriers in the access and use of software, Information and Communication Technologies devices, and assistive technologies.

Canadian Heritage operates within the Government of Canada's Information Technology Infrastructure. Nevertheless, by working collectively we can change our accessible ICT approach and objectives.

[See the barriers and gaps for this pillar under Annex A.](#)

Goals
- Enhance the accessibility of our current information and communication technologies
- Ensure new information and communication technologies are accessible

Key priorities

These priorities have been set by the Treasury Board Secretariat in consultation with employees of the public service ([First Survey on the Draft Public Service Accessibility Strategy](#) and [Second Survey on the Draft Public Service Accessibility Strategy](#)):

1. Enable accessibility features on devices of employees with accessibility needs (79% support from respondents)
2. Establish a streamlined and efficient process to procure assistive technologies
3. Ensure users have access to ongoing technical support (74%)

4. Set standard of 15 working days for employees to get the Information and Communication Technologies they need to do their work. These must be fully functional and accessible (72%)
5. Ensure that all systems, services (buying software service), software, websites and office boardroom equipment are accessible (72%)
6. Review Information and Communication Technologies with employees with disabilities. Identify how they could be more accessible and inclusive (68%)
7. Review systems, software, websites, and equipment to ensure that they are accessible. Where they are not accessible, develop a Plan to address accessibility shortfalls (68%)
8. Provide resources for employees to generate accessible content with common tools (for example, Microsoft Office) (64%)

Action items

Action items are based on the results from the current-state assessment, and direction and guidance from central agencies.

- Consult people with disabilities when planning, buying, and supporting Information and Communication Technologies
- Consult the Accessibility, Accommodation and Adaptive Computer Technology (AAACT) Program on new major projects/purchases/changes
- Continue our "buy not build' strategy when selecting Information and Communication Technologies solutions. We will promote and include accessibility requirements
- Use our Life-Cycle Management approach to address accessibility of legacy systems. We will include accessibility in replacement processes
- Continue to contribute to and leverage federal government approaches to Accessible Information and Communication Technologies
- Invest in and develop the necessary internal capacity to support our goal of barrier-free Information and Communication Technologies

The Chief Information Officer has also developed an Accessible Information and Communication Technologies Framework. Contact the Accessibility Office for more details.

Indicators of success

Some of the factors that will indicate progress:
- Employees with disabilities face less barriers in getting appropriate accessibility tools (software, technology devices, and assistive technologies)
- Evolution of market's ability to offer accessible products (mostly beyond our control)
- When Canadian Heritage replaces its Information and Communication Technologies, it systematically applies accessibility requirements

- New solutions purchased meet the Harmonised European Standard ETSI EN 301 549
- More consultations and user testing with people with lived experience
- Data on overall satisfaction of employees with disabilities with IT system
- Investments and increased internal capacity to support our goal of barrier-free ICT

Pillar 4: Communications, other than Information and Communication Technologies

"Accessible communication benefits all audiences by making information clear, direct, and easy to understand. It takes into consideration the various barriers to accessing information and provides opportunities for feedback." Ontario Council of Libraries

Canadian Heritage's lead for this pillar is the Director General of the Communications Branch.

Background

Canadian Heritage informs the public about its policies, programs, services, and initiatives. The Communications Branch manages these activities, be they public-facing or employee-facing.

The Treasury Board Secretariat released guidelines on making communications products and activities accessible by default. These guidelines help departments to consider accessibility when planning and developing communication products and activities.

Other areas of this Plan cover communications activities between individual employees (such as emailing or communicating with other individuals or groups on platforms such as Teams or Zoom). You can navigate to the following sections for more information: Information and Communications Technologies section and Culture section.

See the barriers and gaps for this pillar under Annex A.

Goals
- Make all communications (internal and external) accessible to everyone, regardless of ability
- Create accessible and inclusive content and distribute it in various accessible formats

Action items

The Communications Branch will continue to improve accessibility, notably:

- Continue leading the Accessible Information and Communication Technologies and Communications Working Group. Ongoing efforts will allow us to coordinate accessibility initiatives and activities, specifically, as they relate to culture, information and communication technologies, and communications
- Broaden this group to include diverse specialists and practitioners. With this group, we can address knowledge and 'silos' across the accessibility pillars
- Work with the new Community of Practice on Accessible Communications

Accessibility training

- Develop a training plan on accessibility tailored to communications practitioners. This is essential to address the knowledge gaps when it comes to accessibility and for all areas of communication
- Develop a plan for funding the procurement of specialized training for communications practitioners. The plan will align with our more general accessibility training efforts (see the culture section of this Plan)

Plain language

- Develop a training plan to comply with the new Accessibility Standards Canada plain language standard.
- Provide web accessibility and plain language evaluation tools to more communications specialists
- Set objectives and benchmarks to evaluate the readability of web content

Web communications

- Implement an accessibility framework for employee-facing web content. It will align with the new Government of Canada web accessibility standard and with internationally recognized European Union's EN 301 549 standard.
- Develop a plan to reform existing intranet content. This plan will include moving some content to self-managed platforms such as SharePoint

Social media

- Develop a training plan for accessible social media practices
- Develop and publish social media accessibility guidelines for Canadian Heritage. These will include guidance on use of social media platforms that have accessibility gaps

Email marketing and communications

- Mandatory general accessibility training for all Canadian Heritage employees. This can address gaps and barriers in email communications

Graphic design, marketing, and video production

- Develop and publish creative design and production accessibility guidelines. These will explain the appropriate use of various accessibility methods for different purposes. For example, using a video on the web versus projecting it at a meeting or event
- Together, develop training on accessible creative design and production practices. This will maximize use of the Digital Accessibility Toolkit. It will also help dispel the myth of creativity versus accessibility
- Provide mandatory accessibility training in communications for all communications employees. Provide general accessibility training for all other employees. This will help address issues on the use of accessible templates
- Address the lack of positive images of people with disabilities in our communication products

Media and public events

- Develop a training plan for accessible in-person and virtual events
- Develop a venue evaluation checklist for in-person events
- Develop a diversity, inclusion, and accessibility checklist for events. This will require collaboration with many businesses units

Indicators of success

- We use inclusive images and language that focus on various abilities in communications products. This includes positive images of people with disabilities
- We have developed, published and are applying guidelines for
  - accessible social media; and
  - accessible creative design and video production
- All clients and employees can access and understand Canadian Heritage communications, regardless of ability
- Public events are accessible
- We use tools to evaluate readability of communications products
- All content is available in accessible formats (if using a platform that is not accessible, there is a link to an accessible one)
- Measure % of public-facing web pages meeting the new EN standard
- Measure % of employee-facing web pages meeting the new EN standard
- Measure % of communications employees who took training on accessible communications, including plain language
- Measure % of employees who took training and who are applying the knowledge
- Measure % of complaints received before and after the training
- Systematic assessment of communications products through quarterly reports. This will ensure they are written in plain language

- We promote accessibility solutions, plans, progress reports, feedback mechanisms and alternate formats. This applies internally and externally

Pillar 5: Procurement of goods, services, and facilities

"If you want to transform the accessibility of a large and complex system, the most efficient way to do this is to work simultaneously from the inside out (e.g., Web professionals at the organization) and the outside in (e.g., purchased goods and services from others)." National Center on Disability and Access to Education

For the procurement pillar, Canadian Heritage's lead is the Director of Procurement in the Chief Financial Officer Branch .

Background

There are two main components of accessible procurement:
- identifying accessibility barriers in purchasing processes
- incorporating accessibility requirements to meet the needs of a broad range of end-users

The Treasury Board Directive on the Management of Procurement specifies that accessibility must be part of the Government of Canada's procurement process.

Where appropriate, departments must:
- include accessibility criteria when specifying requirements for goods, services and construction
- ensure that deliverables incorporate accessibility features

See the barriers and gaps for this pillar under Annex A.

Goals
- Modernize Canadian Heritage procurement practices for goods, services, and facilities. Include accessibility criteria from the onset

Action items

- Raise awareness with clients of different strategies to buy accessibility technologies
- Provide advice and guidance to apply an accessibility lens when buying various commodities
- Support the procurement of accessible goods and services by engaging with the disability community

- Work with stakeholders who buy adaptative technologies. This will improve the process, reduce delays, and measure progress
- Establish corporate agreements that will allow for easy call-up mechanisms. This can improve ability to procure the required goods and services requested

Indicators of success

- Accessibility is considered in all procurement processes, where applicable
- All procurement officers receive training on the importance of accessibility for procurement. They stay well-informed of standards and best practices and raise client awareness
- Fewer exceptions for buying products that do not meet accessibility standards

Pillar 6: Design and delivery of accessible programs and services

"Public discourse on racism, gender discrimination and accessibility becoming increasingly dominant, Canadian Heritage has been called upon to ensure that its programs are reaching the full diversity of the Canadian population, including equity-deserving groups that have been historically excluded and underfunded."
- Canadian Heritage Departmental Plan 2021-2022

The Canadian Heritage Chief Financial Officer, responsible for the Grants and Contributions Centre of Excellence, is the lead for the programs and services pillar. Accountability is shared with departmental Branches who deliver grants and contributions programs to recipients. The Grants and Contributions Centre of Excellence supports operational branches and program staff to ensure policy compliance and improve grants and contributions practices.

Background

Canadian Heritage is an important program delivery and service organization. We have 30 programs (and approximately 90 sub-components) and 27 types of events, celebrations, and commemoration services. The department's total budget from 2020-21 was close to $1.9B. Most expenses fund thousands of recipients who undertake a wide variety of activities in the arts, culture, sports, and heritage fields.

We deliver programs and services in different ways, and through several delivery models. We do this through regional offices or from headquarters.

Over the past 20 years, we have funded over 130 organizations that focus on disability issues, or that offer specific programming for persons with disabilities. The department

does not track its grants and contributions based on disability. As a result, it cannot fully assess the reach and impact of our programs and services on persons with disabilities.

To be effective, programs and services must be accessible and available to all Canadians. They must also be tailored to meet the needs of different equity-deserving groups. We commit to assessing access to funding opportunities by equity-deserving groups. One way is by benchmarking against existing barriers. Additionally, it will assess the impacts of grants and contributions programs on achieving results for equity-deserving groups.

In 2020, we created an Accessible Program Design and Service Delivery Working Group. The group brings together program and service representatives from across the department, including the regions, to explore accessibility and disability inclusion issues.

The Working Group members are building experience and competency about current practices and approaches. This enables us to address accessibility and disability inclusion in programs and services.

See the barriers and gaps for this pillar under Annex A.

Goals

- To equip our employees to design and deliver accessible programs and services
- To increase opportunities for Canadians with disabilities to:
    - make better use of Canadian Heritage's programs and services
    - participate more fully in society
- The public spaces that we used are accessible to Canadians of all abilities. This applies to our events, commemorations, and celebrations
- Stakeholders are satisfied with the accessibility of our programs and services

Action items
Corporate Initiatives

- Create a Director General Committee of key programs and services to delve deeper into:
    - what may be preventing people with disabilities and other equity seeking stakeholders from accessing Canadian Heritage programs and services
    - what may be preventing stakeholders from feeling positive about their experience
    - how branches can better advance accessibility priorities
- Offer training to:
    - raise awareness of accessibility issues across the department

- identify opportunities for improvements in the accessibility of client services
- provide guidance on how to review programs and services through an accessibility lens

- Regularly assess programs and services by:
  - engaging with key stakeholders representing different disabilities and different Inclusion, Diversity, Equity and Accessibility (IDEA) communities
  - involving stakeholders in broader policy discussions and in the decision-making processes regarding IDEA and programs and services
  - conducting surveys to measure client satisfaction, including equity-deserving groups

Sector initiatives
- Undertake Branch self-assessments of public-oriented programs and services. Do this through an intersectionality IDEA lens
- Conduct research to better understand who Canadian Heritage is reaching or excluding from its programs and services
- Get disaggregated data to develop performance indicators
- Develop and provide an array of approaches to application forms and information (on-line, on paper, on e-mail or on website)
- Provide information and documents in accessible and/or multiple formats
- Ensure that accessibility and inclusion measures for grants and contributions programs meet specific criteria. They must be equitable, sustainable, and universally and inclusively designed to address barriers
- Canadian Heritage works with 3rd-party organizations mandated to redistribute funding to stakeholders. Thus, we will require them to respect accessibility needs for programs they deliver
- Regularly assess the diverse accessibility needs of all Canadians in the delivery of Canadian Heritage major events, celebrations, and commemorations
- Search for accessible venues and services to improve major events, celebrations, and commemorations
- Develop Branch action plans to address accessibility gaps with key deliverables

Indicators of success
Fully achieving these intended outcomes will take resources, time, and effort. The first 3-year Plan aims to set a good foundation for significant progress.

Key factors of success include:
- Building the knowledge and expertise of staff. Moving toward a yes-by-default approach to accessible grants and contributions programs and services
- Providing documents and information to stakeholders in an accessible way
- Learning from those with real-life, lived experiences will be critical. This can be

achieved through dialogue with organizations that cater to people with disabilities and with individuals facing barriers to accessibility

- Leveraging data to uncover gaps and inform policy design and program delivery for all Inclusion, Diversity, Equity and Accessibility (IDEA) communities
- Leadership from senior management will be key to changing the narrative moving forward

Pillar 7: Culture change toward disability inclusion

"Disability inclusion at work is about more than hiring people with disabilities. An inclusive workplace values all employees for their strengths. It offers employees with disabilities — whether visible or invisible — an equal opportunity to succeed, to learn, to be compensated fairly, and to advance. True inclusion is about embracing difference." Understood for All Inc.

For culture change toward disability inclusion, Canadian Heritage's lead is the Director General of the Accessibility Office.

Background

Ableism is bias in favor of able-bodied people. It continues to be present across our society. It impacts how we normally think, speak, work, hire and include others. At its heart, ableism is rooted in our belief systems and in the assumption that people without disabilities are superior beings. Seeing the effects of ableism firsthand exposes just how flawed these beliefs have been.

To truly change organizational culture, we really need to consider how we encourage and support employees to contribute the best of themselves. We need actions both at the individual and at the organizational level. To be successful, we need everyone to address the barriers, gaps, and biases to accessibility and disability inclusion.

Canadian Heritage will take inspiration from the Human Rights Maturity Model. This model helps organizations create and sustain an environment where human rights are fully integrated into daily practice.
Employees with disabilities experience higher rates of discrimination (25%, compared to the average 4%) and harassment (23%, compared to the average 8%). Stigma about disabilities, especially invisible disabilities, continues to be an ongoing challenge.

A positive organizational culture is key to preventing personal and systemic discrimination. At Canadian Heritage we recognize the important changes required to achieve real culture transformation, including:

- Greater awareness and understanding of the attitudinal barriers people with disabilities and other equity seeking groups face daily
- Leadership throughout all levels of the organization
- Key role of all managers in bringing about true culture change
- The specific changes needed to encourage people to self-identify as having a disability and to seek accessibility accommodations
- More focus on the intersectionality aspects of accessibility needs and recommendations

Achieving results for Canadians, especially those with disabilities, also requires a culture change toward inclusive design and delivery. This means considering the full range of human diversity.

See the barriers and gaps for this pillar under Annex A.

Goals

- To build a fully accessible Canadian Heritage with an organizational culture:
  - where employees are confident about, and committed to, accessibility and disability inclusion
  - that recognizes and celebrates diversity in all its forms
  - that is free of stigma surrounding disability
  - where everyone applies a disability inclusion lens in all that they do
  - where employees of all abilities are happy and can thrive
- To enhance employee knowledge and engagement with accessibility and disability inclusion

Action items

Initiatives for management

- Implement mandatory training for managers and executives on disability inclusion
- Use the Inclusion, Diversity, Equity and Accessibility (IDEA) committee to report on progress every 6 months for our Plan's 7 areas for action

Initiatives for employees

- Implement mandatory training on:
  - addressing disability inclusion, biases, and barriers to accessibility
  - how to create accessible documents
- Make training available to all our employees
- Create and manage an internal, confidential, accessible, and continuous feedback mechanism

Initiative for Canadians and Canadian Heritage Stakeholders

- Create and manage an external, confidential, continuous and accessible feedback mechanism

Organization-wide initiatives

- Develop and maintain a record of all accessibility training to employees and management. This will be key to tracking progress and maintaining accountability
- Adopt the accessibility policy and a disability lens. Embed it in our programs, services, and policies through a Gender-based Analysis Plus intersectionality analysis
- Work with employees with disabilities to define our approach to the Nothing Without Us principle
- Develop with employees with disabilities principles for a culture of care
- Boost current initiatives and create new opportunities for accessibility and disability inclusion. Specifically, knowledge sharing and expertise capacity building. This includes a network of allies who foster accessibility and disability inclusion
- Conduct a benchmarking exercise to assess our department's progress
- Collaborate with partners across the department to foster culture change. Partners include the Advisory Committee on (Dis) Ability, Internal Organizational Culture Directorate, change management ambassadors, and all equity-deserving groups
- Create new tools and structures for collaboration among units responsible for the areas outlined in this Plan
- Create new tools and structures to remove and prevent accessibility barriers
- Continue to raise awareness about the *Accessible Canada Act*, accessibility and disability inclusion
- Establish a deadline for all documents produced by Canadian Heritage to be accessible

Indicators of success

- Everyone at Canadian Heritage applies an accessibility and disability inclusion lens in all they do (includes processes, policies, procedures, and corporate planning). This includes embracing the Nothing without us approach on a continuous basis. It means co-designing and/or involving people with disabilities at the forefront of all initiatives, policies, and processes
- Canadian Heritage's vibrant network of employees with disabilities is appropriately supported
- Everyone at Canadian Heritage supports a culture of care
- Accessibility and accommodations are normalized. They do not lead to discrimination or harassment, or impact perceptions of performance
- Percentage of employees with disabilities who face harassment declines

- Percentage of employees with disabilities who face discrimination declines
- Our employees understand what accessibility means and why it matters. They have the knowledge and resources to make our department more accessible
- All employees receive accessibility and disability inclusion training. Managers receive additional specialized training
- Meetings and meeting documents are accessible
- A permanent office or centre of expertise for accessibility is put in place
- Canadians and employees have access to a confidential and accessible feedback mechanism. Responsive process to find solutions when needed
- We measure progress for each priority area of this Plan

Conclusion

Implementation of this Plan will set a solid foundation for progress toward the goal of a fully accessible Canada by 2040.

In 2022-2023, each pillar lead will provide timelines for each action item of this Plan and the resources required.

Thank you to all for your ongoing work in advancing accessibility and disability inclusion.

Annex A – Barriers and Gaps

Pillar 1 - Employment

In the development of this pillar, the lead undertook an assessment of barriers and gaps. They identified the following, among others:

Recruitment

- Not enough use of employment programs for students with disabilities
- Canadian Heritage does not encourage people with disabilities to apply to specific job postings
- Job posters are not designed to reach diverse groups of people
- Lack of understanding of the staffing flexibilities allowed by the *Employment Equity Act*

Staffing process (new hires and promotions)

- Persons with disabilities have lower rates of hiring, promotion, and acting opportunities than non-disabled Canadians
- Assessment material is not always accessible
- Hiring criteria is not always effective or matched to the job (complicated language, education requirements, reluctance to use non-imperative for official languages requirements)
- Lack of diversity in selection committees. Lack of awareness of self bias and discriminatory practices
- Lack of variety in tools to adopt an equity lens to evaluate candidates' competencies and knowledge

Data

- Only aggregated data is available on persons with disabilities and may be out of date
- The workforce availability for people with disabilities is limited at a departmental level. It is not currently possible to do a gap analysis by group or by region
- Self-identification does not feel safe for many people with disabilities. Some fear losing job opportunities, promotions – or even reprisal – if they self-identify

Attitudes and awareness

- People frequently base "disability" on the narrower definition in the *Employment Equity Act*. There is little awareness that the definition of disability used in the *Accessible Canada Act* is broader. It includes a full range of abilities and impairments such as:
  - visible disabilities
  - "invisible" disabilities (learning or mental health issues)

- periodic disabilities, such as multiple sclerosis or epilepsy
- Misunderstanding of [accessibility, inclusion, and accommodations](). People use these terms interchangeably, but they do not have the same meaning. Accessibility and inclusion go beyond accommodations
- Social barriers: stigma, labelling, unconscious biases toward people with disabilities. People with disabilities are still perceived as 'abnormal' or referred to in dehumanizing terms

Feedback mechanisms and accountability
- No formal consultation process exists for persons with disabilities. This includes providing feedback at all stages of policy and decision making
- No confidential and accessible feedback mechanism currently exists to allow for sensitive issues

Official languages learning and training
- For most positions, Canadian Heritage requires bilingual linguistic profiles. This reduces the use of employment equity practices for non-imperative staffing
- Lack of linguistic training in the regions. Challenge to access schools and programs (distance or inaccessible facilities, poor internet connection, etc.)

Accommodation process
- Accommodation process can be intrusive and demeaning
- Accommodations are not individualized/ do not respond to individual needs
- Lack of intersectional considerations (factors other than ability such as race, color, gender, region, sub-culture, nation, community)
- Lack of trauma-informed service delivery
- Long delays to receive accommodation measures

Harassment and discrimination
- People with disabilities have the highest rates of harassment and discrimination across the Public Service ([Public Service Employee Survey 2020]())

Inaccessible software
- Some human resources and pay applications (PeopleSoft/MyGC Pay/Phoenix, performance management software) are not accessible
- Accommodations almost always require a third party to do the data-entry and/or paper copies. This may raise concerns about privacy

Pillar 2 – Built Environment
In the development of this pillar, the lead undertook an assessment of barriers and gaps. They identified the following, among others:

Accommodations
- Lengthy and burdensome processes

Interior spaces
- Too many wires in meeting room floors (create movement and flow hazards)
- Bulky furniture, which hinders wheelchair mobility
- Inaccessible way finding
- Lack of adjustable workspaces for employees with light and noise sensitivities
- Poor air quality, including allergens and dust keeping materials
- Lack of Indigenous cultural approach to spaces

Emergency measures
- Fire Plans and emergency management do not fully consider people with disabilities (physical disabilities, hard of hearing, visual impairment)

Working from home and hybrid
- Many employees have greater accommodations at home
- Employees cannot carry with them all the accessibility tools they need to work
- COVID-19 anxiety related to returning to the new GC workplace due to the increase of shared spaces

New Government of Canada (GC) Workplace (non-assigned workspaces)
- Accessibility shortcoming with the new GC workplace. Some consider it more accessible. However, it creates new barriers for other employees with disabilities
- Obstacles related to the open work environment concept (i.e., distractions, noise)
- Noise related to ongoing construction of new offices
- Long timelines for renovated and improved spaces
- Inaccessible washrooms
- Lack of spaces for hybrid meetings
- A culture with a low tolerance for change

Outdoor spaces
- Employees with mobility impairments have difficulty accessing the main entrances of Canadian Heritage buildings due to lack of snow removal

Pillar 3 – Information and Communication Technologies

In the development of this pillar, the lead undertook an assessment of barriers and gaps, which include technical, governance and processes, among others:

Main barriers

- Need to receive information and communication technologies tools within reasonable deadlines. Lengthy, complex, and centralized processes
- Too many layers of approval (for example, managers, medical notes)
- Too much focus on security and other risks
- Accessibility tools for workplace accommodations need to follow employees to new jobs
- Need for a centre of expertise with sufficient funding to support technological accommodations
- Accessibility should be a requirement for buying information and communication technologies
- People with disabilities should test the products before we buy them
- Importance of telework for people with disabilities
- Technology for telework/virtual work should be functional and available across Canada
- Challenges with complexity, lack of clarity and amount of content shared in documents

Software

- Majority (136) of our assets are commercial-off-the-shelf (COTS) products. We can use them, but cannot access their source codes
- Other 66 software assets are custom solutions that we developed. Thus, we can modify the software to provide support for accessibility
- Most software assets before 2019 have limited or no support for accessibility

Planning, Provisioning and Support

- Need to improve the planning, provisioning and support of information and communication technologies. This will have a significant impact on information and communication technologies accessibility
- Need to update the departmental software inventory. This will give us abetter understanding of software assets
- Most software assets before 2019 have limited or no support for accessibility
- More support needed for accessibility considerations when evaluating and or developing information and communication technologies
- Need to continue adoption of Government of Canada Workplace Accessibility Passport

Information and Communication Technology devices (laptops, tablets, cell phones)

- Several workplace information and communication technology devices available in the market are "open devices". The challenge is when adaptive technologies need different hardware capacity and software configurations. This often results in the need for custom orders, which add excessive delays to the process.

Assistive Technologies

We receive 8-10 requests for adaptive technologies each year. This can take significant time to acquire through Government of Canada processes.

Pillar 4 – Communications, other than information and communication technologies

In the development of this pillar, the lead undertook an assessment of barriers and gaps. They identified the following, among others:

Accessibility training

- Knowledge gaps/lack of specialized accessibility training across a range of communications functions (for example, graphic design and video production)
- No mandatory accessibility training programs on creating accessible content

Plain language

- Lack of awareness and availability of training on plain language writing
- No standard approach outside of the Communications Branch (such as web publications and emails to clients and employees etc.)
- Lack of standardized tools and standards (except for externally facing web content) available to evaluate the reading level of content. No mechanism or benchmark for plain language use across all platforms

Web communications

- The Government of Canada Standard on Web Accessibility covers only public facing web content
- The upcoming new standard will include employee-facing content. However, it will take us several years to implement these new requirements, particularly for existing content
- Lack of enforceable policies for employee-facing web content. This has resulted in a low level of compliance with accessibility practices. This is true for content not on the web too. Some of this content is hosted on various platforms, some of which are not accessible
- Reforming employee-facing intranet and other user-generated content will be costly and time consuming. Without more dedicated resources, it could take 3-5 years or longer to do so

Social media

- Social media platforms have different levels of accessibility. They don't always allow for the creation of fully accessible content. This means that accessible social media communications are on a best-effort basis. Thus, we may have to post content to multiple platforms to meet all requirements
- There are no Government of Canada wide standards available for creating, posting, or evaluating accessible social media content. Reference standards such as the Standard on Web Accessibility are not tailored or suitable for social media

Email marketing and communications

- Across Canadian Heritage, we have limited knowledge and training for employees on how to make email content and documents accessible. There are also no standards in this area to enforce compliance
- There are no mandatory accessibility training programs on creating accessible content. Training for Word and PowerPoint, for example, is on a voluntary basis.

Graphic design, marketing, and video production

- Some departments are creating their own guidelines for creative design and production (example: Employment and Social Development Canada's current practices and considerations for accessible communications)
- There is no common authority, cross-organizational standards or training available for graphic design. This applies both in general and government wide. One exception is for web design.
- Lack of centralized standards for accessible graphic design. The exception is where the products are used on the web (the Standard on Web Accessibility then applies)
- Perceived negative association between creative design versus accessibility needs. Following design trends results in effective products for most consumers. However, they often fall short of accessibility best practices. This makes them unsuitable for some Canadians
- Marketing and advertising agencies in the Canadian marketplace do not necessarily have the knowledge and skills required to meet accessibility requirements for creative content
- Lack of standards, training, and knowledge available for accessible video production. The exception is for those posted on public-facing web sites (subject to the Standard on Web Accessibility)
- Lack of standardized processes to include American Sign Language (ASL), langue des signes québécoise (LSQ) and closed captioning in videos across various platforms (web, multiple social media platforms etc.) Creating multiple

versions of videos to meet accessibility requirements requires many resources. It also slows down the production process
- Off the shelf studio production and graphic design software lack built in tools to check accessibility. Designers rely on multiple third-party tools. These tools may not be supported within Canadian Heritage or the Government of Canada
- There is a lack of awareness, processes, and training among employees on how to use accessible templates
- Built-in accessibility checkers in software such as Microsoft Word do not automatically check for all accessibility issues (such as a lack of heading structure). To fully check content compliance, users need accessibility training. Training in this area is not widely available

Media and public events
- Limited resources and expertise available to plan and execute accessible events
- Some third-party services can include live caption translation and / or sign language interpretation. This applies to virtual meetings and events. However, they can be costly, difficult to source, and technically complex
- Off the shelf video conferencing products (such as Teams and Zoom) provide a built-in live caption function. However, they can only be set to work in one language at a time. Thus, this does not work for events or meetings held in both of Canada's official languages. Also, the quality of automated captions is often lacking
- Fully accessible venues (such as the National Press Gallery) exist within the National Capital Region. However, these venues are in high demand and not always available. Events held outside the National Capital Region are on a best-effort basis for accessibility because these facilities are lacking
- Bilingual meetings present accessibility barriers, especially for the Deaf community

Pillar 5 – Procurement
In the development of this pillar, the lead undertook an assessment of barriers and gaps. They identified the following, among others:

Barriers related to procurement within our control
- Lack of knowledge and training on accessibility requirements and accessibility generally. This increases the risk of noncompliance to accessibility laws, standards, and best practices
- Lack of funding for accessible technologies or accommodations
- Information technology specialists do not have enough support to deliver accessible procurement processes. They are under resourced, which delays access to workplace accommodation tools

- Some of our processes prevent us from buying accessible technologies or materials. Thus, we cannot promptly adapt the built environment for employees with disabilities
- If needs are not identified early, employees do not have access to the workplace or the accessibility tools they need to fully contribute

Barriers related to procurement outside of our control
- Absence of a framework on accessible procurement (guidelines, procedures, templates, frequently asked questions)
- Markets do not offer enough fully accessible products and services

Pillar 6 – Accessible programs and services
In the development of this pillar, the lead undertook an assessment of barriers and gaps. They identified the following, among others:

Attitudinal barriers
- Degree of understanding of disability among program staff at all levels. This includes knowledge of the different types of disabilities
- When it comes to grants and contributions, assumptions that:
  - one delivery approach fits all Canadians
  - all can access application forms with ease

Organizational barriers
- Program and service design (policies, eligibility criteria, and procedures)
- Program and service delivery (practices, communication and outreach strategies, the physical environment)
- Level of awareness and sensitivity of program officers about disability
- Equity and reach within grants and contribution funding programs
- Narrow eligibility criteria
- Limited program funds

Data gaps
- Limited data on the accessibility of federal programs and services provided by Canadian Heritage and the Government of Canada. This particularly affects equity seeking groups, including people with disabilities.

Physical barriers
- Encountered at Canadian Heritage's major events, celebrations, commemorations, state ceremonial and protocol activities

Information or communication barriers
- Inaccessible documents such as program guidelines and application forms

- Inaccessible legal documents (such as contribution agreements) which are lengthy and establish accountabilities of funding recipients
- Lack of images and language that recognize the diversity and strengths of people with disabilities. These images can help challenge negative attitudes and promote positive ones

Technological barriers
- Non-accessible online application forms and information on funding opportunities
- Non-accessible internal systems for grants and contributions and for financial management

Pillar 7 - Culture
In the development of this pillar, the lead undertook an assessment of barriers and gaps. They identified the following, among others:

Barriers related to knowledge and understanding
- Lack of understanding of the scope of the *Accessible Canada Act*. For example, the broader definitions of accessibility and of disability, including invisible disabilities
- Lack of understanding that accessibility is a must, not a nice to have
- Lack of an inclusive and accessible by default approach (this includes embedding accessibility and a disability inclusion lens in all processes, policies, and programs)
- Leaving people with lived experience out of the conversation
- Lack of awareness about intersectionality. For example, there are more persons with disabilities among Indigenous communities

Lack of services, resources, tools, and training
- Lack of availability of services and resources for persons with disabilities
- Lack of training, accountability, and/or reluctance of managers for:
  - accessibility
  - disability (visible and invisible) inclusion
  - discrimination, harassment and bullying against people with disabilities
- Lack of time/funding and investments for accessibility
- No confidential feedback mechanism related to accessibility internally or externally

Barriers related to processes
- People with disabilities continually face the same barriers. This causes them to repeat themselves or find their own solutions, generating frustration
- Complexity, lack of flexibility (one size-fits-all approach) and heaviness of some processes

- Not enough dialogue and collaboration
- Process of requesting accommodation agreements that can be intrusive and demeaning
- Lack of knowledge and/or use of plain language

Organizational mindset and attitudinal barriers

- Ongoing attitudinal barriers about disabilities, including stigma, systemic ableism, labelling and unconscious biases. For example, workplace accommodations are sometimes perceived as preferential treatment. This comes from the idea that those receiving accommodations have an unfair advantage
- Higher rates of discrimination and harassment toward employees with disabilities. Lower rate of well-being prevents employees with disabilities from reaching their full potential
- A culture that focuses on the costs of accessibility or of hiring persons with disabilities. Instead, the focus should be on value added, abilities and potential
- A culture of low tolerance to change
- Lack of a comprehensive approach to accessibility. Silos hinder our ability to remove complex or systemic barriers
- Lack of trust between employees and the organization and of disclosure processes. This is due to fear of punishment. Trust is key for employees with disabilities and of other equity-deserving groups