



Canadian Radio-television and  
Telecommunications Commission

Conseil de la radiodiffusion et des  
télécommunications canadiennes

Canada

# LEFT TURN RIGHT TURN ACCESSIBILITY REPORT

November 4, 2022

**REPORT SUBMITTED BY: Left Turn Right Turn**

Left Turn Right Turn Ltd.

2080 Danforth Ave, Toronto, ON M4C 1J9

<https://ltrt.ca>

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## Executive Summary

The Canadian Radio-Television and Telecommunications Commission (the CRTC) retained Left Turn Right Turn (LTRT) to assess the state of accessibility within the organization to support the CRTC's internal development of its first Accessibility Plan. To identify barriers and determine opportunities the following methods of inquiry were used:

- A review of relevant documents.
- Consultations with various subject matter experts on staff at the CRTC.
- A voluntary survey to CRTC employees.
- Consultations with employees and the public, based on summaries of preliminary findings.
- Four virtual round tables for the public and disability advocacy groups.

We made broad observations regarding the current state of accessibility at the CRTC, including:

- That the CRTC has a high level of commitment to accessibility.
- Staff are committed to continuous learning and improvement.
- There are challenges in the internal accessibility culture that could lead to barriers.
- While there are processes to address accessibility needs and concerns in place, they do not form a cohesive strategy to improve accessibility and eliminate barriers.
- The CRTC faces constraints, that are out of their control, in implementing certain accessibility measures.
- There are several organizational improvements to accessibility that have already been actioned.

The barriers and opportunities identified through this assessment are briefly outlined in the table below:

<b>Barriers by Pillar Area</b>	<b>Opportunities by Pillar Area</b>
<p><b>General Barriers:</b></p> <ul style="list-style-type: none"> <li>• There is an overall need for more knowledge about accessibility to be built into each sector of the CRTC and with each CRTC staff member.</li> <li>• There are gaps in terms of ensuring broader consultation processes with persons with various disabilities.</li> </ul>	<p><b>General Opportunities:</b></p> <ul style="list-style-type: none"> <li>• Develop relationships with groups connected to communities of persons with cognitive and intellectual disabilities to better gather their feedback.</li> <li>• Create a position for an accessibility expert that could be a resource across the organization.</li> <li>• Solicit accessibility feedback on a proactive basis and commit to a meaningful engagement strategy with the disability community, in addition to the ACA required feedback mechanism.</li> </ul>
<p><b>Employment Barriers:</b></p> <ul style="list-style-type: none"> <li>• Managers lack the training, resources, and knowledge to support their staff's accommodations.</li> <li>• There is a gap in knowledge and attitudinal barriers around mental health disabilities, cognitive disabilities, other non-apparent or invisible disabilities, and neurodivergence.</li> </ul>	<p><b>Employment Opportunities:</b></p> <ul style="list-style-type: none"> <li>• Develop a professional learning and development plan that is specific to accessibility.</li> <li>• Focus on manager training on accessibility, including any type of training courses or workshops as well as continuous and formalized communication within the CRTC.</li> </ul>

<ul style="list-style-type: none"> <li>• There are accessibility barriers that can be found in CRTC’s hiring processes.</li> <li>• The accommodation process may be unclear, potentially due to insufficient communication or decentralization.</li> <li>• Proof of need in requesting accommodations may be prohibitive for employees with disabilities to go through the process.</li> <li>• Culture of meetings and time pressures pose barriers for some employees with disabilities.</li> </ul>	<ul style="list-style-type: none"> <li>• To the extent possible, continue flexible work arrangement policies, including the CRTC Telework agreement that guide teleworking.</li> <li>• Continue to monitor and explore the availability of Canada School of Public Service (CSPS) courses related to accessibility and disability for employees as they become available. Search for other training opportunities that may exist outside of this structure.</li> <li>• Explore and implement processes to solicit accessibility concerns internally that do not rely on employee self-identification.</li> <li>• Review job postings and recruitment practices in consultation with persons with disabilities to identify and remove language or processes that are not-disability friendly.</li> <li>• In addition to hiring more people with disabilities, the CRTC could aim to specifically hire Deaf staff. This would support Deaf members of the public to communicate in their first language to the CRTC without needing an interpreter.</li> </ul>
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	<ul style="list-style-type: none"> <li>• Review and revise the CRTC’s accommodations process and develop an internal document that reflects these changes.</li> <li>• Implement workplace norms that require standard meeting-free hours; breaks between meetings; and/or breaks during longer meetings.</li> </ul>
<p><b>Built Environment Barriers:</b></p> <ul style="list-style-type: none"> <li>• Employees report many built environment issues related to environmental disabilities or sensitivities.</li> <li>• Open concept, hotelling office environments erect accessibility barriers for employees.</li> <li>• The accessibility of the built environment is tied to complying with standards and responding to requests instead of striving for full accessibility.</li> <li>• There are known accessibility issues within the built environment that need to be addressed (e.g., turning space in washrooms for wheelchairs).</li> </ul>	<p><b>Built Environment Opportunities:</b></p> <ul style="list-style-type: none"> <li>• Undertake audits of CRTC’s built environment that include compliance with modern accessibility best practices. These modern best practices came into place after the CRTC moved into its space.</li> <li>• Evaluate structural layouts and policies about environmental and sensory factors within the built environment (e.g. scent, lighting, noise).</li> <li>• Collect data from employees and the public about accessibility concerns surrounding CRTC’s built environment.</li> <li>• Address built environment issues that are easy-fixes and that the CRTC could act upon while awaiting longer-term changes.</li> </ul>

	<ul style="list-style-type: none"> <li>• Advocate with PSPC for proactive and continuous improvements to the accessibility of the CRTC built environment.</li> </ul>
<p><b>ICT Barriers:</b></p> <ul style="list-style-type: none"> <li>• The Internal Web Applications package has programs that are older and are not accessible (e.g., Application Support System).</li> <li>• There may be a gap in testing for accessibility as it relates to diverse types of disabilities.</li> <li>• The external website has undergone significant improvement. However, it still has areas with navigability and usability issues. This includes aspects such as their online web forms.</li> <li>• Some IT systems and tools available to employees are not easy to use, accessible, or customizable to their needs.</li> <li>• The CRTC website does not allow video submissions to be uploaded to Commission proceedings. Participants must find a third-party provider to host their submissions.</li> </ul>	<p><b>ICT Opportunities:</b></p> <ul style="list-style-type: none"> <li>• Maintain accessibility testing for internal and external websites, including the possibility of periodic audits to ensure that they meet changing accessibility standards and best practices.</li> <li>• Commit to a workplan for making existing inaccessible tools and apps accessible.</li> <li>• Consider increasing the file size limit to allow for more detailed submissions to the Commission’s proceedings and evaluate whether an in-house video submission platform is feasible long-term.</li> <li>• Evaluate current technological systems and tools used by CRTC employees and address the gaps in their accessibility (i.e. the accessibility of document management systems, Microsoft Teams, Adobe Suite).</li> </ul>

<ul style="list-style-type: none"> <li>IT staff and other CRTC employees may not have the knowledge to support employees in terms of what accessible ICT tools they have access to.</li> </ul>	
<p><b>Communications Barriers:</b></p> <ul style="list-style-type: none"> <li>There needs to be more training and organizational buy-in to adopt plain language.</li> <li>ASL/LSQ translation will no longer be offered by the CRTC’s previous provider, which affects the provision of information in both these languages going forward.</li> <li>None of the most frequently accessed content on the CRTC’s website is directly available in ASL, LSQ, or Indigenous Sign Languages.</li> <li>The timelines for sign language submissions to the CRTC’s proceedings may be too short given the work involved in producing these video submissions.</li> <li>While CRTC is consultative, there are gaps in terms of which disabilities are represented in these consultations and, as such, decisions or regulatory changes may be unreflective of certain disability groups.</li> </ul>	<p><b>Communications Opportunities:</b></p> <ul style="list-style-type: none"> <li>Continue to implement the plain language style guide to ensure that it is used for all forms of communication and that all staff are trained on it.</li> <li>Create a plan to ensure that ASL/LSQ translation can continue despite current developments.</li> <li>Implement a formalized process for various types of documentation to be easily submitted and filtered within the CRTC.</li> <li>Develop a plan and dedicate the appropriate resources to translate the most frequently accessed areas of the CRTC website into sign language.</li> <li>Make concerted efforts to ensure that all consultation processes are reflective of all types of disabilities, particularly when it comes to consulting on decisions and regulatory policies.</li> </ul>



<ul style="list-style-type: none"> <li>• There is a gap in outreach to individuals about what CRTC does and how it can help or support people.</li> <li>• The CRTC cannot communicate directly with Canadians in sign languages. Instead, the CRTC relies on emails to communicate in English or French with Deaf Canadians.</li> </ul>	
<p><b>Procurement Barriers:</b></p> <ul style="list-style-type: none"> <li>• Digital procurement processes rely on <a href="#">Shared Services Canada</a> without confirming how accessibility is considered in those processes.</li> <li>• Accessibility is not a routine consideration in procurement.</li> </ul>	<p><b>Procurement Opportunities:</b></p> <ul style="list-style-type: none"> <li>• Build institutional knowledge and policy frameworks at the CRTC related to the procurement of products and services.</li> <li>• Clarify how much <a href="#">Shared Services Canada</a> (SSC) considers accessibility of the digital products.</li> <li>• Develop a checklist of accessibility needs when choosing external spaces for CRTC's operations as needed.</li> </ul>

The CRTC's programs and services all relate to communication and therefore the barriers are listed in that section. It provides no transportation services.

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# 1 Introduction

The Accessible Canada Act (ACA) seeks to benefit Canadians, especially those with disabilities, by realizing a Canada that is free of barriers by 2040. The Canadian Radio-Television and Telecommunications Commission (CRTC) is required to publish their first accessibility plan by December 31, 2022. CRTC retained Left Turn Right Turn (LTRT) to assess their state of accessibility, consult people with disabilities, and identify opportunities for improvement.

This report covers the state of accessibility in how the CRTC operates. That includes the experience for employees with disabilities and the accessibility of CRTC hearings and the complaints process. This report does not cover the accessibility of internet, phone, and television services that the CRTC regulates.

In its Accessibility Plan, which will cover a three-year period, the CRTC needs to summarize its current accessibility barriers, and explain its plans to remove them. This report covers the internal state of accessibility at the CRTC through insights provided by CRTC employees in different divisions, and employees with disabilities. Separate consultations were held with the Canadian public to gather their insights and experiences. This report focuses on summarizing successes to date, identifying barriers observed in each of the ACA priority areas, and suggesting opportunities to remove, reduce those barriers or to prevent potential barriers from materializing. This report provides the foundations for the CRTC to be able to report on its barriers and identifies opportunities to improve accessibility.

The report is organized as follows:

1. Introduction
2. Methodology
3. Key Findings

4. Successes, Barriers, and Opportunities
5. Conclusion and Next Steps

The project included several stages of review and consultation. The accessibility assessment process was made up of three key pieces: document review, staff interviews, and consultations with employees and the public. Consultations took place through surveys, sharing – and asking for input on - documents that summarize findings, and roundtable discussions.

## 2 Methodology

It was important to understand the knowledge that CRTC staff hold about the current state of accessibility, including any work that has been done and barriers they are aware of. We completed this task by reviewing documents and interviewing CRTC staff responsible for the ACA priority areas. Institutional knowledge is critical because it paints a picture of the culture at the CRTC. It shows the culture that is being supported and maintained. For example, policies show what the CRTC has committed to officially, and what staff must do. The stances and knowledge of leaders within the different sectors of the CRTC show what they are aware of and how open they would be in addressing these barriers.

It was important to get feedback from people with disabilities. CRTC employees with disabilities are key informants about the CRTC's internal accessibility. They are affected by the accessibility of the CRTC. They also have knowledge about how the public interact with the CRTC and what accessibility issues have been raised. Similarly, it is important to gather the perspectives of the members of the public interested in the CRTC. Their experiences and priorities will be different than those of CRTC employees and the CRTC operates in the interests of Canadians.

## 2.1 Methodology Overview

To assess the current state of accessibility at the CRTC at the institutional level and identify opportunities for improvement, LTRT has conducted:

- **Document Review:** LTRT requested relevant CRTC documents and information that paint a picture of its current state of accessibility. We analyzed these under each priority area for successes and progress that have already occurred. We also looked for any gaps or questions to ask of subject matter experts in the interviews.
- **Subject Matter Expert Interviews:** LTRT worked with the CRTC to identify who to interview for each ACA priority area. We decided how to structure interviews on ACA priority areas. The CRTC also identified additional areas or persons that would benefit this project. We asked general questions about each person's knowledge about accessibility and policies. We asked what they are currently doing, gaps that they know exist, and feedback that they have received. We also clarified questions we had arising from the document review. In our analysis we organized our interview notes under each ACA priority area. We also organized them in terms of successes, barriers, and potential opportunities.
- **Internal Feedback on Accessibility Assessment Findings:** An initial report was circulated to subject matter experts to confirm the findings. It was also posted on the CRTC's intranet, and employees were asked to comment on the findings. This document served to validate/ correct the findings and close any gaps.
- **External Feedback on Accessibility Assessment Findings:** A summary of the initial report was circulated for external feedback through a website. The purpose of this summary document was to be transparent with the public and stakeholder groups on the state of accessibility at the CRTC. This summary also allowed us to get the perspectives of people with disabilities and validate the accuracy of our findings.
- **Round table discussions:** More detailed feedback from the public was obtained through four focus groups held in English and American Sign Language (ASL) and

French and Quebec Sign Language (LSQ), at the end of September and the first week of October 2022.

## 2.2 Employee Survey

The employee survey was deployed by the CRTC and LTRT at the end of July 2022. There were 89 total respondents. 44% of respondents (39) identified as being a person with a disability.

Are you a person with a disability?	%
Yes	44% (39)
No	38% (34)
Prefer not to answer	9% (8)
No, but someone I am very close to has a disability	9% (8)

We asked respondents to identify the type of disability they have. Note that the percentages listed below do not total 100% because many respondents selected multiple disabilities.

Type of Disability	%
Mental health	67% (26)
Environmental	46% (18)
Cognitive	36% (14)
Chronic	33% (13)
Physical	25% (10)
Other, not listed	20% (8)
Sensory, related to vision	13% (5)
Sensory, related to hearing	10% (4)
Other sensory	10% (4)
Communication	3% (1)

The findings from this survey are included in the sections that follow.

## 2.3 Public Consultations

Disability advocacy organizations and the public were invited to participate in an online survey, submit written feedback on a summary of findings, and/or attend a virtual consultation meeting. A toll-free telephone number and email address were provided for stakeholders if they wished to provide their comments in alternative formats. The insights gained from these discussions were extremely valuable to our understanding of the barriers faced both by individuals with disabilities and advocacy organizations that already have relationships with the CRTC.

Some stakeholders opted to submit written feedback on the summary document and did so through the “CRTC Conversations” platform. The findings from these consultations are included in the sections that follow.

## 2.4 Employee Consultations

The employee survey was conducted prior to LTRT’s delivery of the interim accessibility assessment report. We also shared a summary document that outlined the barriers and opportunities identified. This summary was shared through the CRTC’s intranet and employees were invited to comment on what was included. Employees could choose to provide their comments anonymously using a webform, or by telephone or email. The feedback that was given has been included in the sections that follow in this report.

# 3 Key Findings

In this section, we have provided our broad observations regarding the current state of accessibility at the CRTC. These observations include:

- That the CRTC has a high level of commitment to accessibility.
- Staff are committed to continuous learning and improvement.



- There are challenges in the internal accessibility culture that could lead to barriers.
- While there are processes to address accessibility needs and concerns in place, they do not form a cohesive strategy to improve accessibility and eliminate barriers.
- The CRTC faces constraints, that are out of their control, in implementing certain accessibility measures.
- There are several organizational improvements to accessibility that have already been actioned.

Specific barriers and opportunities in each priority area will be addressed in later sections.

### 3.1 High Level of Institutional Commitment to Accessibility

This report includes many areas that accessibility can be improved. However, we also want to acknowledge the improvements that the CRTC has already made and its overall organizational culture. These are not the norm across the federal sector and should not be taken for granted at the CRTC. They are critical to ongoing improvements at the CRTC.

Through the staff interviews, we noted that there is support for accessibility as a core part of the CRTC's operations. There was also an understanding of the barriers and gaps that exist in individual priority areas.

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“...before COVID they (the CRTC) did a lot of outreach. Where they would come to organizations and do town halls or participate at conferences and I think they need to start doing that again. Especially (given) the fact that they have quite a lot of responsibility now with the Accessible Canada Act to deal with complaints.”  
-Virtual round table participant (external)

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The CRTC culture stresses the importance of accessibility to better serve the needs of employees and the Canadian public. A key example would be the work that is being done by the Information Technology (IT) department in building in accessibility in the

development of IT systems. The CRTC's IT department has also ensured it has internal processes to confirm the accessibility of items that it is buying.

Another key example is how responsive the CRTC is providing accessible services in its hearings and filing of documents. We observed an openness to receiving submissions in different formats. Doing so frees up the process for persons with disabilities to be able to access a seamless, relatively barrier-free system that works for them. We saw the CRTC's clear commitment to making hearing spaces and external spaces accessible. The CRTC evaluates these spaces through the lens of accessibility. An example of this is the presence of a hearing secretary, who is responsive to accessibility needs when planning hearings and as they arise on the day of the hearing. This highlights CRTC's commitment to ensuring that the barriers to facilitating accessibility both proactively and reactively.

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**"I just wanted to say thank you. This has been one of the best accessibility zoom meetings I have been a part of in a while. Thank you very much for collecting everything that we've had to say."- Virtual roundtable participant (external)**

**"I don't know if this (these virtual round table discussion) is something that will be happening on an annual basis. I think the CRTC should be doing more community engagement so that's something I would like to express to them as well too to keep this up."- Virtual round table participant (external)**

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The CRTC is also an outlier in its commitment to providing information in ASL and LSQ formats. This is a particularly unique stance that is rarely evident in other organizations. It is not only that CRTC is embarking on this process, which is an outlier itself. It is impressive that the CRTC showed a deep desire to continue to grow in this area because it would better serve the public. A participant at the roundtable discussions applauded the CRTC high level of accessibility at its Video Relay Service (VRS) hearings in 2013. However, they also noted that that level of accessibility was not the norm in other hearings.

We do not wish to take away from the successes that the CRTC has had in increasing the accessibility of its operations. However, we must note that every participant in the stakeholder consultation meetings stressed the need for the CRTC to be proactive in its approach to accessibility. Similarly, it was expressed that there is a sense of a one-size-fits-all approach to accessibility in dealing with complaints and the Client Services team.

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**“Access is not just about formats and websites, it’s about inclusion and belonging and that means communicating with the person in front of you in the most respectful and dignified way possible.” - Virtual Roundtable participant (external)**

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### 3.2 Continuous Improvement and Learning

It was clear to us throughout interviews with staff that they do their best to uphold the CRTC’s commitment to accessibility as much as possible. An example of this includes the CRTC consistently highlighting what accommodations are available to the public for its proceedings.

This commitment is partially connected to the CRTC’s role in regulating accessibility in telecommunications and broadcasting. It also appears rooted in CRTC’s culture: a general “customer service” mentality and recognition of the importance of accessibility. For example, we noted a desire to ensure that people who interact with the CRTC are met with the best service and the fewest obstacles.

A phrase that was often repeated was that “we don’t know what we don’t know.” While CRTC showed a clear commitment to accessibility, staff were also humble in their understanding of accessibility and highlighted the work that they still need to do. CRTC staff were able to identify gaps or barriers in accessibility in their specific areas of expertise, highlighting that building a more accessible CRTC is an area of importance organizationally and as part of their roles. In many of the priority areas, staff were also able to identify steps

that they have already taken, as well as future steps to progress in terms of their accessibility goals.

When we discussed accessibility requirements, many staff pointed out their department's compliance to these standards and their understanding that compliance is just the start. To be truly accessible is to go beyond standards. Based upon these conversations, we see a great opportunity for CRTC to engage in more accessibility learning as part of its plan, especially as the willingness from CRTC staff interviewed appears to be there.

In general, CRTC staff expressed that they recognize the need for more consultations with persons with disabilities externally. The CRTC has already embarked on good work in this area (e.g., external focus groups, attending Deaf and disability conferences pre-COVID). It was highlighted in the roundtable discussions that having a standing committee made up of both staff and stakeholders with disabilities to advise the CRTC on an ongoing basis would be a welcome addition to the CRTC's consultation practices with equity seeking groups. It is also promising that CRTC acknowledges that there are currently gaps that exist in this area and that it is committed to finding out what accounts for these gaps, and how they can best be addressed. For example, CRTC staff identified a gap in terms of consulting with persons with cognitive or intellectual disabilities. Interviewees also mentioned investigating whether their consultation tools and formats are fully accessible as that may be an issue that prevents more consultation success.

### 3.3 Internal Culture: Challenges

Throughout our interactions, CRTC subject matter experts stated a commitment to meeting the accessibility needs of CRTC employees and were able to point to specific examples where barriers were removed for employee benefit. However, respondents to the employee survey also noted barriers and negative experiences in making accommodation requests. Of the 39 respondents with disabilities, 74% (28) experienced barriers in employment and 41% (16) reported challenges in the accommodation process. Respondents reported having the necessity of accommodations questioned, challenging processes, and

skepticism about what type of accommodations can and should be offered. Survey respondents noted:

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“I recognize that I should advocate more strongly for my accommodation needs, however, I am somewhat hesitant to disclose my disability. Once an initial accommodation request was denied, I did not feel comfortable to insist for a better solution.” – Employee with a disability

“I find the response very hit or miss and really depends on who is responding. For example, a lot of the discussions around the swing space were incredibly dismissive (i.e., employees with light sensitivity "can just wear sunglasses" and someone with a disability can just "use a brief case to carry around his stuff". There is a real openness when it doesn't cost us anything, but [if] we have a direction in mind and an accommodation [sic] would get in the way or be a pain to have to address, it is dismissed.” – Employee without a disability

“It's important to note that there should be an accessibility office focusing on regulatory issues and communication but there should also be another piece on how to provide accessibility for the staff, for individuals who work at CRTC.” - Virtual roundtable participant (external)

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In subject matter expert interviews, we noted similar questions about the need for some accommodation requests. This tension did not appear to be a distrustful appraisal of the requesting employee's intentions. Rather it appears more on the limits of what equipment can be offered, budgetary constraints, and trust in expert determinations.

We understand, and have highlighted later in this report, the reality of these cost and availability limitations that necessitate vetting the provision of these materials. However, these limitations and questions about accommodations also impact the experience, morale, and performance of employees with disabilities. As a result, the employment section below identifies some opportunities to reduce these limitations to provide the most open and person-centric accommodations process. Importantly, if employees with disabilities

perceive stigma and attitudinal barriers, this can make them less likely to request the accommodations that they need as they may believe their request will be subject to additional scrutiny.

The CRTC has also taken steps to solicit employee feedback through its Introspect survey. Introspect survey is a CRTC-specific employee survey that complements the Public Service Employee survey to help identify areas of improvement within the workplace. This feedback mechanism could be an important avenue for the CRTC to identify these cultural barriers, how they are experienced by its employees with disabilities, and what organizational steps would best support cultural change in this area. This would have the double benefit of highlighting the importance of consulting the perspectives of people and support the CRTC in meeting a key ACA obligation.

### 3.4 Accessibility Improvements Made and Responsiveness

There have been recent improvements to accessibility at the CRTC (see specific areas identified in [Section 4](#)). CRTC staff also noted that they had to be reactive (rather than proactive) to some accessibility concerns. Another way to look at this would be to say that they respond to requests or issues as they come up.

It is good to be responsive to needs as they arise as it presents a person-centred approach. This individual approach is quite common. However, proactivity can create an organizational culture where people with disabilities feel comfortable, supported, and able to do their jobs barrier-free. Proactivity helps to ease the process that persons with disabilities must go through to request changes. Lengthy processes are costly to both the requester and individuals handling the requests. Those costs include time, effort, effectiveness, and budget. Survey respondents commented:

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“Disclosing a disability is beyond scary. It was once something that you kept hidden to yourself. I have no clue how to disclose it without feeling defeated or ashamed.” – Employee with a disability

“...I should file a complaint, but I am afraid because the CRTC on paper says that I should expect things but then in reality does not enforce what the statutes say on paper, putting me back in the same situation again. And you are in a situation where you are having to talk about your body and how your body is different and how your body does not match someone else's definition of disability. Over, and over, and over again.”- Virtual roundtable participant (external)

“I think the CRTC has great intentions, but many things are done ad hoc and by request. While you end up with the right solution, it can be difficult for employees to have to jump through the hoops to get to the desired result. The smoother the process can be, the better for the employee.” – Employee with a disability

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Stigma around disability is pervasive in society and, by extension, in all settings and organizations. Both the fear of stigma and certain stigmatized views came up in the employee survey. Proactive accessibility allows persons with disabilities to have their accessibility needs met without the stigma and effort of self-identification and requesting accommodations.

### 3.5 External Constraints

There are also aspects of accessibility that the CRTC is more constrained in addressing. Examples include, but are not limited to, the following:

- The CRTC does not own its building. It is unable to independently make many building changes. Changes would need to be done in consultation with the landlord and [Public Services and Procurement Canada](#) who holds the lease to the building on behalf of the CRTC and would be the landlord's responsibility.

- The CRTC is constrained by requirements of the [Treasury Board Secretariat \(TBS\)](#), [Public Services and Procurement Canada \(PSPC\)](#), and [Shared Services Canada \(SSC\)](#).
- The CRTC may be constrained by other federal legislation and policies. It is also constrained by some aspects of its mandate as a regulatory body (e.g., use of legal language in some contexts).
- Ready to use bilingual training that the CRTC could use, may not meet the organization's accessibility knowledge and barrier removal.
- There are resourcing constraints, including budgetary, time, and personnel commitments necessary.

There are gaps in terms of what types of accessible tools have been developed and are available for the CRTC to utilize (e.g., software development tools for IT). In our interviews, there was a range of responses to these external constraints. While they were identified and recognized by CRTC staff, there was a commitment to finding solutions. However, there were times when the external constraints that the CRTC faces were discussed as if there was no action that could be taken on the part of the CRTC, to resolve them.

The CRTC does face genuine external limits that are out of its control; however, there are ways in which the CRTC can make significant improvements to accessibility through areas that it does control. If a system or environment is housed or controlled by another agency, the CRTC should ask itself if there is room to engage in discussions with these other agencies to provide additional accessibility features. If not, are there additional and separate accessibility pieces that the CRTC can offer outside of these systems to address an accessibility gap or barrier?

As an example of the way moving past external constraints is already being done at CRTC, IT staff mentioned that they discuss accessibility standards with suppliers. Even if [Shared Services Canada \(SSC\)](#) supports the procurement of these services and needs to approve



any purchases, the IT team has factored accessibility into conversations with suppliers in an informal way to ensure that, as much as possible, they are using materials that conform to high accessibility standards.

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“I think in terms of budgetary issues if there is a budget established...let's say 7% of that (budget) is for accessibility costs -- 7% for accessibility costs when it comes to providing [video remote interpretation] VRI, interpreters for hearings, translation, whatnot, there can easily be a line item established in that. I think that that would help the CRTC immensely with their accessibility plan. That way they (the public) would know for sure there was money available because, you know, we're getting tired of hearing 'we don't have a budget line for that', 'we don't have any money for that.' That's not the case. The CRTC does have to learn to live with the fact that accessibility is going to be an issue and it should cost them 7% yearly. That should be a line item in their budget.” - Virtual round table participant (external)

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### 3.6 CRTC Policy Decision

The CRTC's policy and legislative decisions are not within the scope of this project. However, we share these comments as a theme throughout the consultations. Participants mentioned the high cost of data and internet plans, along with the low availability of 'build your own' cellular plans. Participants noted that this presents a significant barrier to people with disabilities, particularly Black, Indigenous, and people of colour with disabilities.

It was mentioned by a participant that the high costs of internet and cellular services not only impact people's ability to stay connected but also their ability to engage with the CRTC, to file complaints, to participate in hearings and submit feedback in a variety of ways. For example, participants noted that VRS requires a significant amount of data and access to a device capable of supporting a VRS app. Because of the income gap for people with disabilities, many will not have access to this technology.

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“...what does someone do if they do not have access to the Internet? If they cannot even begin the complaint process because they have yet to end up with the adaptive tool that allows them to interact with their (the CRTC’s) website at all. There are a lot of people and individuals...who all are not going to make it to the table here. Because either, they do not have the technology, they do not have the time, they cannot afford to maintain the technology, (or) it is not the most comfortable way to interact with them.” – Virtual round table participant (external)

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It was also noted during one of the roundtable discussions that the CRTC should thoroughly re-evaluate the structure of its National Contribution Fund to include contributions paid by every individual who has a phone, internet, and/or cable plan to increase the size of the fund and reduce corporate influence over the fund.

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“It should be a national contribution fund contributed by all individuals and then they (the CRTC) get to decide for themselves and not have the phone companies decide for themselves how much they're giving, and then there's an issue of only so much (sic) funds available. This access is for everyone, and everyone can benefit from it.” – Virtual roundtable participant (external)

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Again, this report does not identify barriers and recommendations on the accessibility of these services or on the CRTC’s operations as a regulatory and legislative body, but it was mentioned so frequently that we felt it had to be included in our observations.

## 4 Successes, Barriers, and Opportunities

The ACA identifies seven (7) priority areas, of which six (6) are relevant to CRTC (excluding transportation which relates to the “transportation of passengers within the transportation network”). This section will identify barriers that have come up in the accessibility assessment so far within these six areas. While they will be divided in this way, accessibility

barriers can often span several priority areas and, as such, some barriers may be repeated. Appendix 1 provides a summary list of the barriers and Appendix 2 provides a summary list of the opportunities.

## 4.1 General Barriers and Opportunities (G)

### 4.1.1 Barriers

G1: There is an overall need for more knowledge about accessibility to be built into each sector within the CRTC and with each CRTC staff member.

There does not appear to be a planned training program for all CRTC employees specifically related to accessibility and disability stigma. Some departments reported specific training (e.g., the IT department mentioned the use of the Deque University Web Accessibility Training Package and the Accessibility, Accommodation and Adaptive Computer Technology Program). There is also informal training and knowledge sharing. Some other training that was mentioned may be useful in improving accessibility but are not accessibility specific.

There is a need to explore the training gap around disability, ableism, stigma, and accessibility. Full accessibility cannot be achieved without shifting institutional values, goals, culture, and perceptions regarding disability. In other words, it is also important to understand **why** the CRTC should engage in accessibility planning and the removal of accessibility barriers.

G2: There are gaps in terms of ensuring broader consultation processes with persons with various disabilities.

The CRTC has done great work in consulting people with disabilities and has shown a high level of commitment to this process and in improving the process further. At the same time, the CRTC has indicated that it continues to face some barriers in this regard. Maybe most importantly, the CRTC indicated a barrier in its ability to get a broad representation of various disabilities in their consultation processes. Specifically, interviewees mentioned that

they have not yet been successful in their efforts to consult persons with cognitive or intellectual disabilities at a level that the CRTC would like to. As such, there is work that the CRTC could embark on to further enhance this aspect of its work.

Attendees at all consultation meetings held on the CRTC's ACA planning process stressed the need for more engagement. Participants wanted more engagement with the CRTC generally, and the Commissioners' offices specifically.

#### 4.1.2 Opportunities

Opportunity # 1: Develop relationships with groups connected to communities of persons with cognitive and intellectual disabilities to better gather their feedback.

The CRTC has already developed important relationships with many disability groups and has consulted with them extensively. This provides a strong blueprint for the CRTC to foster these same relationships with communities of persons with cognitive and intellectual disabilities.

The CRTC could begin this process by engaging in ongoing conversations to understand these communities' barriers to participation. The CRTC could also explore what these communities need to be able to participate, and whether there are alternative consultative models that may work to better engage these communities.

Roundtable participants also noted that they would like the CRTC to resume sending representatives to disability conferences to make connections and stay up to date with the latest practices and technologies available.

Opportunity # 2: Create a position for an accessibility expert that could be a resource across the organization.

Accessibility has many elements to it. The interviews highlighted that there is a level of uncertainty about how to attain accessibility goals. The CRTC would benefit from creating

an accessibility specific position to be a resource for accessibility and persons with disabilities. The position may support accessibility in the following ways:

- Developing and implementing broad accessibility initiatives across the organization.
- Following through on the implementation of the [Government of Canada Workplace Accessibility Passport program](#)
- Supporting the needs of and advocating for employees with disabilities.
- Monitor accessibility feedback.
- Ensure that accessibility barriers are addressed.
- Act as a bridge between different levels and departments at the CRTC when it comes to addressing accessibility barriers.
- Develop accessibility policies and guides (e.g., a plain language guide).

To be clear, this recommendation is not to minimize the responsibility of individual sectors within the CRTC. Rather its intention is to have dedicated resourcing in coordinating and implementing CRTC's accessibility efforts.

This position would need to be a full-time staff position. Adding these responsibilities to an existing portfolio would not provide adequate resources. LTRT recommends expediting the development of this position to meet the needs of its staff members sooner.

Opportunity #3: Solicit accessibility feedback on a proactive basis and commit to a meaningful engagement strategy with the disability community, in addition to the ACA required feedback mechanism.

One of the requirements of the ACA is to institute a feedback mechanism to allow individuals to identify barriers that they have encountered. Such feedback mechanisms require individuals to actively seek them out and therefore will not get as many responses as if the CRTC actively requested feedback. The CRTC may wish to implement a feedback

survey, convene an advisory council of people with disabilities, and/or implement a consistent engagement series between Commissioners and disability advocacy groups. This was mentioned by several round table participants as an excellent way for the CRTC to build relationships with the community and to improve the level of confidence that their issues are being taken as seriously as those of the telecommunications corporations that the CRTC regulates.

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“In [province redacted], Commissioner [name redacted] had really great engagement with [name redacted], and they would keep in contact and engage and have a conversation about what was happening in the community, but we never had the same engagement here in [province redacted]. “- Virtual round table participant (external)

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## 4.2 Employment (E)

### 4.2.1 Successes

The CRTC has been responsive to accessibility needs as they arise. In interviews, it was apparent that the CRTC wants to understand the needs of its employees and respond accordingly to meet these needs. Interviewees mentioned that meetings are conducted with managers where they can bring up any issues or questions they may have. They work together to figure out how to build that managerial knowledge, as well as coming up with practical solutions. Managers tend to be flexible and open to supporting their employees. For example, a CRTC leader indicated that they provided specific accommodations to some of their staff with disabilities based on an understanding of their individual needs (e.g., adapting tasks and proposing opportunities of learning).

The CRTC has also held training to give employees some of the skills needed to respond to accessibility issues. These include how to meet employee needs and change management. Interviewees also reported significant work to better understand the prevalence of disability in their workplace, recognizing the limitations of self-identification processes. Staff deployed

a survey which provided them with more accurate demographics and demonstrated a commitment to close the discrepancies in these data sources.

## 4.2.2 Barriers

E1: Managers lack the training, resources, and knowledge to support their staff's accommodations.

Managers often have a formal role in the accommodations process and through performance management may identify the need for accommodation. Further, an employee may first discuss a potential accommodation with their employer; and managers have a role in implementing some accommodations. A key concern brought up in the interviews was the lack of accessibility-specific training or resources for managers in implementing any type of accommodations. Managers have a list of mandatory and recommended training in multiple fields, including diversity and inclusion. However, there appears to be a specific gap related to accessibility. Without building this knowledge, managers may be less successful in accommodating employees.

In fact, in the employee survey, a lack of knowledge and the ability to meet employees' accessibility requests by CRTC managers emerged as one of the most pervasive and impactful issues. Respondents noted:

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“Many managers are not equipped to deal with accessibility and accommodations. While they want to help, many don't know enough about disabilities or the process either. Having clear processes and some training or support material for managers and supervisors would help.” – Employee with a disability

“The lack of a clear process to request accommodations can be confusing. It's already hard to ask for an accommodation, so having to try to figure out who to speak to and what I need to prepare (e.g., a doctor's note) by asking a number of people is a barrier. There should be a clear process so that employees can feel

safe asking for an accommodation. It should also be fair to everyone, so regardless of your position, you should have access to equal quality service. Timely resolution is also important” – Employee with a disability

“Standardize best practices and remove management discretion from one team to another. That would be a real message from senior management of the importance that we attach to it.”<sup>1</sup> [translation] – Employee with a disability

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Some of the comments also indicated that employees encountered both resistance and stigma from their managers. This resistance is reported to have resulted in their requests for accommodations being denied. It also resulted in employees being hesitant and scared in going to their managers for support. It was also mentioned by some individuals that this occurred on a manager-by-manager basis. Managers had varying levels of knowledge and commitment to meeting their staff’s accessibility needs, to the point where accessibility becomes discretionary. As a result, some of the feedback also indicated that there needs to be a common agreement and understanding across CRTC managers and leadership. Employees wished for equitable and similar experiences regardless of where they work at the CRTC or what role they occupy.

E2: There is a gap in knowledge and there exists attitudinal barriers around mental health disabilities, cognitive disabilities, other non-apparent or invisible disabilities, and neurodivergence.

Respondents to the employee survey highlighted the work needed to address accessibility concerns related to mental health disabilities, cognitive disabilities, other non-apparent/ hidden disabilities, and neurodiversity. One aspect of this barrier is that there is a general lack of knowledge and information regarding these disabilities, which could lead to

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<sup>1</sup> Original: “Uniformiser les bonnes pratiques et enlever la discrétion de la gestion d’une équipe à l’autre. Ça, ça serait un vrai message de la haute direction de l’importance qu’on y accorde.”



misperceptions about how to support persons with these types of disabilities, stigma around their abilities, and uncertainty regarding how to create and implement policies that proactively address these barriers. Respondents reported the following:

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“Sometimes certain disabilities are not visible, such as mild autism, anxiety disorders or comprehension delays, in short I believe that people must learn to be more understanding, calm and respect people's (office) bubbles and be more patient.”<sup>2</sup> [translation] – Employee close to someone with a disability

“Yes. The public service is characterized by a total rejection of people with varying emotions. As soon as a person is seen as exhibiting emotions, they are misunderstood, even if many other qualities can compensate. An employee may have varying moods but still perform, especially if accommodations are put in place.”<sup>3</sup> [translation] – Employee with a disability

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However, another aspect of this barrier is policies and actions that could stem from this lack of knowledge and understanding. Some respondents faced negative attitudes or differential treatment for their mental health disability or their neurodivergence from colleagues and managers. Accommodations may also be more likely to be denied or questioned when it comes to these disabilities as they are not necessarily visible and are widely still misunderstood.

The CRTC is not an outlier in this regard. This barrier points to a larger societal issue that is outside of CRTC's ability to fully eliminate. It is important to explicitly list this barrier as

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<sup>2</sup> Original: « Parfois certains handicaps ne sont pas visible, comme l'autisme léger, les troubles anxieux ou les retards en compréhension, bref je crois que les gens doivent apprendre à être plus compréhensif, calme et respecter les bulles (bureau) des gens et être plus patient”

<sup>3</sup> Original: “Oui. La fonction publique est caractérisée par un rejet total des gens ayant des émotions variables. Dès qu'une personne est considérée comme exposant des émotions, elle est mal perçue, et ce, même si de nombreuses autres qualités peuvent compenser. Un employé peut être d'humeur inégale, mais tout de même performer, surtout si des mesures d'adaptation sont mises en place.”

employees felt strongly that this is one of the more major barriers and there are still steps that the CRTC could take that would reduce the impact on employees.

E3: There are accessibility barriers that can be found in CRTC's recruitment processes.

CRTC staff indicated that they were aware of gaps that exist in terms of their recruitment and retention of persons with disabilities. They also highlighted how they would like to explore this both in general terms and in terms of specific communities or groups (e.g., individuals with cognitive and learning disabilities).

Consultation participants noted that the CRTC needs to do more to attract people with disabilities, especially people who are Deaf. They noted that this would both improve communication with Deaf people while also improving the knowledge base needed to craft regulations.

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**“As we hire and give more opportunities in the deaf community it enables the ecosystem, and we can get more as a result. As I mentioned, the FCC (US Federal Communications Commission) has seven deaf lawyers. As they get their foot in the door it gives them income to further their education. We have to look at a long-term recruitment strategy, a five, ten-year plan. That's important in terms of success.” – Virtual roundtable participant (external)**

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The employee survey identified accessibility barriers in the interview process, primarily when it comes to individuals with mental health disabilities or who are neurodivergent. Issues include time constraints, the format of questions, necessary testing, interviewers wearing perfumes, and interview processes that are rigid and anxiety-provoking.

We suggest that the language used when communicating with applicants (e.g., job postings, post-application communication, requesting accommodations) may be another potential barrier to explore. We suggest evaluating and addressing any accessibility

concerns that come up in the onboarding process, including how long it takes for new hires to receive their requested accommodations.

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**“Appearance of bias during the hiring process.”<sup>4</sup> [translation] – Employee with a disability**

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E4: The accommodation process may be unclear, potentially due to insufficient communication or decentralization.

The current accommodation processes are clear to the people involved in them. But the processes are not clear to employees with disabilities or their managers. For example, should a request for accessible software be routed to an individual’s manager first, to the IT department, or elsewhere? A lack of clarity about how to achieve access produces barriers for individuals with disabilities, including being unable to navigate the system and delays in receiving necessary accommodations. In the employee survey, employees stated:

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**“The lack of a clear process to request accommodations can be confusing. It’s already hard to ask for an accommodation, so having to try to figure out who to speak to and what I need to prepare (e.g., a doctor’s note) by asking a number of people is a barrier. There should be a clear process so that employees can feel safe asking for an accommodation [sic].” – Employee with a disability**

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E5: Proof of need in requesting accommodations may be prohibitive for employees with disabilities to go through the process.

CRTC staff mentioned several processes and policies related to accommodation requests. Among these, the CRTC requires third-party documentation from the requesting individual

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<sup>4</sup> Original: “ Apparence de préjugés durant le processus d'embauche.”

(for example, medical letter). Requests related to ergonomic assessment require assessment from an ergonomic expert. Staff noted that it would be a rare case where a person who provides the necessary documentation would be denied. Requesting documentation to support accommodation requests is in line with current norms and legal requirements. However, it is also complicated and obstructive for persons with disabilities and creates significant barriers for them.

This barrier has been validated by responses from the employee survey, where a employees raised this issue. Participants wrote:

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“My doctor is pissed my employer is insisting they provide technical advice when employer already have AACT to ... engage with to provide accommodations expertise.” – Employee with a disability

“...still have to become more agile at meeting needs without always having to ask for doctor or fit to work assessment. In some cases could save time by using other means to meet needs...” – Employee with a disability

“Most persistent systemic barrier for obtaining accessibility accommodation is insisting doctors note (are required) to provide any exceptions from standard.” – Employee with a disability

“In general everything is fine, especially for the physical side (only if you have a doctor [note] for ergonomics, on the other hand), but it also might be necessary to have a certain flexibility on this subject, it is in 2022 most people don't have a doctor but we certainly have discomforts...”<sup>5</sup> – Employee close to someone with a disability

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<sup>5</sup> Original: “En général tout va bien, surtout pour le côté physique (si vous avez un médecin seulement par contre pour l'ergo), mais il faudrait peut-être avoir une certaine flexibilité aussi à ce sujet, on est en 2022 la plupart des gens n'ont pas de médecin mais on certainement des inconforts...”

It is understandable that some documentation would be built into CRTC's process. However, the CRTC may benefit from looking at how this is written in policy and implemented, and where changes could be made. For example, is documentation needed for all requests? Or could a threshold be set for accommodations that do not need documentation. Clarity around what types of accommodations do need documentation, and which do not would help managers and employees. It would be important to do so in consultation with people with disabilities, as well as with a justice-lens that recognizes how different people experience barriers differently.

Previous consultations as part of the 2020-21 Learning Needs Survey conducted by the National Managers Community (NMC) also highlighted this barrier. They noted the need to resubmit evidence when changing positions, offices, or supervisor. Both employees and supervisors consulted preferred an overall "yes-by-default" approach instead. The [Government of Canada's Workplace Accessibility Passport](#), which recently concluded its pilot phase, was also strongly supported to facilitate transfers.

E6: Culture of meetings and time pressures pose barriers for some employees with disabilities.

Some survey respondents pointed to the culture of meetings; and time pressures as posing barriers to them. Work that requires people to sit at computers all day; move quickly from one meeting to another; and participate in large meetings were identified as problematic. In addition, respondents pointed to norms that managers and directors work long hours.

Respondents commented:

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**“The workplace is very much set up for neurotypical individuals and does not take into account the needs of neurodiverse individuals. The way individuals are expected to work on screens all day and go from virtual meeting to virtual meeting all day long with no break will likely lead to sensory burnout for many individuals very quickly.” – Employee with a disability**

“Long meetings cause problems for women with menorrhagia/hypermenorrhea as well as for disabled people who have to go to the toilet more often or take longer to go. Enclosed spaces where people with sensory sensitivity could go to work.”<sup>6</sup> [translation]– Employee with a disability

“There is room for improvement at the management level because senior management expects a manager, and directors, to achieve their goals, even if it has a negative impact on their mental health. It’s impossible to say I limit myself to my normal hours, even if it is to preserve our mental health (people who are anxious or have other mental health problems) because we are seen as not having a team spirit, not performing, etc.”<sup>7</sup> [translation]– Employee with a disability

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### 4.2.3 Opportunities

Opportunity # 4: Develop a professional learning and development plan that is specific to accessibility.

To provide staff with job-specific information about accessibility and address disability bias, CRTC could develop an accessibility training plan. This training could:

- Span across its entire organization
- Be both broad (e.g., general accessibility principles and ableism training) and role-specific (e.g., manager training on types of accommodations)

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<sup>6</sup> Original: “Les longues réunions causent problème aux femmes souffrant de ménorragie/d'hyperménorrhée ainsi qu'aux personnes handicapées qui doivent aller plus souvent aux toilettes ou prennent plus de temps pour y aller. Des cabines fermées où les personnes souffrant de sensibilité sensorielle pourraient aller travailler.”

<sup>7</sup> Original: “Il y a des progrès à faire au niveau de la gestion car la haute gestion s'attend à ce qu'un gestionnaire, et les directeurs, atteignent leurs objectifs, et ce, même si cela a un impact négatif sur leur santé mentale. Impossible de dire je me limite à mes heures normales, même si c'est pour préserver notre santé mentale (gens anxieux ou ayant d'autres problèmes de santé mentale) car on est vu comme ne pas avoir d'esprit d'équipe, non-performant, etc.”

- Be both built into the onboarding phase of a new employee and continuous throughout an employee's time at CRTC
- Incorporate the voices of people with disabilities
- Build in a schedule of renewal and updating (e.g., you must renew your training every three years)

A more structured and formalized plan would be beneficial for CRTC in the long-term as it would ensure that a culture of accessibility is built and maintained in the CRTC, be reflective of changing and improving accessibility standards, and reiterate the importance of accessibility in the seven areas of the ACA, as well as in CRTC's internal and external processes.

Based on employee feedback, we would also suggest that the CRTC pay particular attention to education, learning, and training related to mental health disabilities, cognitive disabilities, and neurodiversity. Training should be based on increasing awareness, decreasing stigma, and best practices concerning accommodations.

Opportunity # 5: Focus on manager training on accessibility, including any type of training courses or workshops as well as continuous and formalized communication within the CRTC.

CRTC should also focus on those in leadership roles given their significant role in the accommodation and accessibility process. One aspect that wasn't mentioned in the interviews was built-in training specific for management or leadership. A knowledge gap was also identified among managers about how to support an employee's accommodation needs. This could be formalized as a necessary step in managers' performance review and professional development (if available).

One strategy that was mentioned during the interviews was that there were meetings with managers around this subject. For example, the annual Managers' Retreat could be

leveraged to provide training on these subjects. It could also serve as a forum for discussion and sharing of best practices and lessons learned. This is a key avenue that would be beneficial to continue. [The Action Learning Series](#) was noted by staff as being planned for fall 2022. Other meetings have previously been self-organized and on an ad hoc, voluntary basis. Accessibility training should be a key priority to respond to any issues in a timely manner and to build knowledge on accessibility throughout CRTC leadership.

Opportunity # 6: To the extent possible, continue flexible work arrangement policies, including the CRTC Telework agreement that guide teleworking.

Many of the survey respondents indicated that continuing and further extending flexible work arrangement policies would support their needs and ensure greater accessibility at the CRTC. They indicated that this would be helpful in the following:

- Greater work-life balance, which would benefit employees' mental health, including but not limited to those with diagnosed mental health disabilities.
- For individuals with environmental and sensory disabilities, they will be able to avoid triggers by being allowed to work from home (e.g., no scents, quiet, adjusted lighting).
- Flexible scheduling, including exploring a four-day work week, support persons with disabilities such as mental health disabilities and chronic pain.

Individuals indicated that working from home was generally not supported much prior to the pandemic. A lot of accessibility barriers were addressed by the transition to work from home during the pandemic. To continue to support flexible working arrangements, the CRTC will need to evaluate its operational needs on an ongoing basis. Following an analysis of all CRTC positions in early 2022, CRTC management has approved 85% of its positions as having potential for full-time telework, with the remainder having potential for a combination of on-site work and telework. No positions have been identified as requiring on-site work only. Positions will be re-evaluated on an annual basis for telework potential.



Opportunity # 7: Continue to monitor and explore the availability of Canada School of Public Service (CSPS) courses related to accessibility and disability for employees as they become available. Search for other training opportunities that may exist outside of this structure.

There are gaps that remain in what is currently available. However, the CRTC is aware of some courses related to accessibility and disability offered by the CSPS. The CRTC should continue to make these courses available to its employees and make some core courses mandatory, ensuring that any updated or new training or courses are made available as soon as possible. The CRTC could also explore other learning opportunities outside of CSPS courses that may benefit organizational knowledge and capacity-building regarding accessibility.

Opportunity # 8: Explore and implement processes to solicit accessibility concerns internally that do not rely on employee self-identification.

In developing and deploying the Introspect survey, the CRTC was able to increase its knowledge and understanding of the percentage of its employees with disabilities. It appears that the CRTC succeeded in decreasing the fear of identification within the organization in a way that also increased its knowledge about accessibility in the organization. We believe this is a positive step. It is also a positive step that CRTC staff highlighted how they have not stopped at data collection and are looking at analyzing how to use this data to improve accessibility in the organization.

The CRTC may have further opportunity to use its experience with the Introspect survey to look for how to make self-identification less of an intimidating process. However, the CRTC could also benefit by finding ways to provide comments on accessibility issues and requests for accommodation that do not require employees to self-identify as having a disability. Avenues that could be explored are:

- Taking a proactive approach to accessibility where data is collected on accessibility as a whole and suggestions are employed organization wide.
- Continuing to develop methods to solicit accessibility concerns to show that there is no connection to self-identification.

CRTC could also continue to explore more avenues to increase employee self-identification in a safe manner. The launch of a new government-wide self-identification form, which has shown success in increasing self-identification in its pilot phase, is anticipated in fall 2022. This would also be beneficial. However, given the reality that there will always be a level of distrust in this process, developing processes that are not reliant on self-identification alone would also be beneficial.

Opportunity # 9: Review job postings and recruitment practices in consultation with persons with disabilities to identify and remove language or processes that are not-disability friendly.

The CRTC faces constraints to the accessibility of its recruitment processes and practices. These constraints include broader government policies and directives on recruitment. There is also a gap in knowledge about why barriers exist. We recommend that CRTC undertake a review to determine where the gaps are and what can be done to remove them (e.g., recruitment strategy review with a focus on accessibility).

CRTC could, in consultation with persons with disabilities, analyze and improve upon its job postings, job descriptions, and job requirements to ensure that there are no explicit or implicit barriers for individuals with disabilities to apply. This could be a change in the wording of job postings, an analysis of how required skills are determined, and a more explicit statement of commitment to welcoming persons with disabilities to both apply and work in the organization. We also recommend that the CRTC explore their processes within recruitment (e.g., testing requirements, how interviews are conducted) as this came up as a barrier in the employee survey.

Opportunity # 10: In addition to hiring more people with disabilities, the CRTC could aim to specifically hire Deaf staff. This would support Deaf members of the public to communicate in their first language to the CRTC without needing an interpreter.

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“I think that there’s just an unawareness in the federal government on where they find – you know, where they find this untapped pool. If they put the posting online they figure whoever – you know, that’s good enough we’re leaving it open.”-

Virtual roundtable participant

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The CRTC should make a recommendation to the [Treasury Board](#) and to the [Public Service Commission](#) to explore more non-traditional platforms and recruitment strategies for the recruitment of equity deserving groups. The CRTC has existing relationships with several Deaf and disability advocacy groups. These relationships should be looked to not only as a resource on regulatory issues, but also on hiring and retention issues. Many people with disabilities have faced years and decades of discrimination in the job application and hiring process and many have entirely given up on searching for a position that will accommodate their needs.

As highlighted in the quote above, posting a job opportunity on a government website may not reach individuals in some marginalized groups. If people are not engaging with the website, they will not see the posting. This is a widespread issue and one that would be quickly alleviated if the CRTC, and all federal agencies, involve advocacy organizations for equity seeking groups as part of the overall recruitment strategy for the federal public service.

With regards to the hiring of Deaf staff, this serves a particular purpose in enabling Deaf Canadians to communicate directly with the CRTC in their native sign language, this is beneficial both for representation and for ease of access in communicating with the CRTC. Having Deaf staff ideally, or sign language fluent staff, would help to remove the added

hurdle of having to translate one's experiences or feedback into another language and provide direct access for Deaf Canadians to the CRTC.

Opportunity # 11: Review and revise the CRTC's accommodations process and develop an internal document that reflects these changes.

There may be an opportunity for the CRTC to create a more centralized and clearer approach to accommodations and accessibility. This could occur through clearer policies that are communicated well to employees at all levels. A well-documented process would describe both the informal portions of the process (e.g., a discussion between a manager and employee) and the formal process (e.g., when a written request is submitted). It would also define what request a manager has authority to accept alone; and which require a more formal process. Further, it would define which accommodations requests require documentation, and which do not.

CRTC may also want to consider hiring accessibility or accommodation specific coordinator(s) for this purpose. We have seen several organizations going in this direction. CRTC is a great forum for this type of position. Such a role would likely be embraced within the organization and seen as helpful to supporting positive organizational culture. We note that full funding would be needed for this new position. This type of position could also serve to provide a case-management and support approach for more complex accommodations cases; an approach which has shown success in other departments, specifically in support of the [Government of Canada Workplace Accessibility Passport](#) accommodations passport initiative.

Opportunity # 12: Implement workplace norms that require standard meeting-free hours; breaks between meetings; and/or breaks during longer meetings.

It has become much more common in the wake of the pandemic for organizations to dedicate a set number of hours during the work week for 'deep focus' or 'deep work'. These are periods where no meetings can be scheduled unless necessary and, in some

cases, there is a communications black out on messaging platforms like Slack or Teams so as not to distract people while they complete this focus work. Short breaks can be built into meeting agendas so that staff can take a few minutes to process information and re-focus for the remainder of the meeting.

This can be structured in a variety of ways. For example, if a meeting is scheduled for three hours, hourly 10-minute breaks could be scheduled during the meeting. Meetings could also be scheduled to start at 5 minutes after the hour or end 5 minutes before the hour. This would provide participants with a brief break between meetings. The CRTC could set meeting free times of the week to support focused work.

## 4.3 The Built Environment (B)

### 4.3.1 Successes

CRTC is temporarily moving buildings while upgrades to the outer shell of the building occur. Other upgrades may take place in the future but are not yet confirmed. We recommend that CRTC consider and address concerns in the space it will occupy on a temporary basis starting in fall/winter 2022 and future spaces as well.

### 4.3.2 Barriers

B1: Employees report many built environment issues related to environmental disabilities or sensitivities.

Major issues about the built environment were brought up in the employee survey, especially in relation to environmental considerations (e.g., scents, lighting, noise).

Respondents to the survey indicated that this is an ongoing issue with scents even as the CRTC has already increased awareness on this issue. As a result, the CRTC may need to explore other ways to accommodate these needs, communicate scent policies, or enforce those policies. Respondents also pointed to cleaning products and other environmental triggers that may exacerbate this barrier.

Respondents also highlighted sharp, fluorescent lighting as a barrier they have encountered. Some respondents found it difficult to receive accommodations for this, which could include having them unplugged or dimmed. A respondent mentioned that they had to find another workspace. Another respondent indicated that, even when these accommodations were installed, they were eventually replaced by building maintenance who reacted poorly and argued that this cannot be changed and was not their responsibility.

Respondents also identified a noisy work environment as a barrier that leads to them being unable to concentrate or being overwhelmed. Noise concerns are also a factor in critiquing open-floor office spaces.

B2: Open concept, hotelling office environments erect accessibility barriers for employees.

In the employee survey, concerns were raised about the inaccessibility of the open office floor plans. Respondents were concerned about how the open floor plan impacts their ability to concentrate and get their work done. They also noted feeling overwhelmed and overstimulated in an open office. Two quotes from respondents highlight this issue:

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“There appears to be a [sic] idolization of a future workspace that is bright and open. That type of work environment fundamentally doesn't work for everyone and there has been little acknowledgement of that fact beyond messages such as "you may need to wear sunglasses and noise cancelling headphones". –  
Employee

“Changes to open-plan offices will have a negative effect on some employees. Some people need to have a minimum of privacy in their workplace to perform well. Sitting in different places (workstations without assigned places), in full view at all times, being over-stimulated by movements/noises/lights in the room is

going to be... to the detriment of people already having these challenges...”<sup>8</sup>  
[translation] – Employee

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B3: The accessibility of the built environment is tied to complying with standards and responding to requests instead of striving for full accessibility.

We understand that the CRTC is a tenant and does not have full control of its building. Nonetheless, CRTC is responsible for the accessibility of its space and has a responsibility to become aware of any accessibility barriers, address what it can address to the best of its abilities, and advocate for any other changes that it cannot address as an organization. Ultimately, it is still within CRTC’s area of responsibility to ensure that the accessibility needs of its employees, stakeholders, and the public concerning the built environment are addressed.

Staff reported their compliance with the current applicable standards. Standards typically grandparent buildings that have not undergone major renovations or which have been acquired after their effective date (e.g. [Treasury Board Secretariat’s Directive on Management of Real Property](#), Appendix D: Standard on Barrier-Free Access to Real Property). As a result, compliance with applicable standards is a minimum requirement. It is not reflective of full accessibility and there are known barriers in the CRTC building (see section below).

Accessibility needs related to the built environment are addressed on a reactive, individual basis. An audit of the built environment has not been completed. While being responsive is a great characteristic, this also means that CRTC is putting the burden of identifying built

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<sup>8</sup> Original: “Les modifications des bureaux à aire ouverte vont avoir un effet négatif pour certains employés. Certaines personnes ont besoin d’avoir un minimum d’intimité dans leurs lieu de travail pour être performant. Le fait d’être assis à des endroits différents (postes de travail sans places assignées), à la vu de tous en tout temps, être sur-stimulé par des mouvements/bruits/lumières dans la salle va être fait principalement au détriment des personnes ayant déjà des défis...”

environment accessibility concerns on individuals to identify. There are barriers to this, including a lack of knowledge about the process of doing so, fear of potentially being seen as a nuisance for bringing forward a concern, or maybe simply not knowing what they are able to bring up. It was not apparent in the interviews what data collection methods have been used, if any, to solicit this feedback (e.g., surveys, audits).

In other areas, the CRTC is striving to move past compliance and towards full accessibility. Given the CRTC's commitment to accessibility, the CRTC may wish to proactively prioritize, plan, and work with [Public Services and Procurement Canada](#) (PSPC) to improve the accessibility of its physical space in the years ahead.

B4: There are known accessibility issues within the built environment that need to be addressed (e.g., turning space in washrooms for wheelchairs).

Finally, some interviewees brought up some accessibility issues concerning the built environment of which they are already aware. Given that the CRTC is temporarily relocating, these issues cannot be immediately fixed. While we did not conduct an audit of the physical space, the issues identified in CRTC's current space include:

- Small or cramped spaces that do not have adequate space for mobility devices or service animals (e.g., meeting rooms, washrooms, hallways, kitchens and common areas, elevators).
- Lack of automatic door openers on many internal doorways.
- No visual emergency announcements.
- Lack of audio or voice support in some elevators to help navigation.
- Navigability issues for persons with visual impairments.
- There are not enough quiet rooms or sensory rooms for the number of employees.
- Small turning radiuses in bathrooms.



- Washroom stalls with locks requiring dexterity.

### 4.3.3 Opportunities

Opportunity # 13: Undertake audits of CRTC's built environment that include compliance with modern accessibility best practices. These modern best practices came into place after the CRTC moved into its space.

The [Treasury Board Secretariat's Directive on Management of Real Property](#), Appendix D: Standard on Barrier-Free Access to Real Property incorporates Canadian standards on accessibility from the Canadian Standards Association. However, these accessibility standards only apply to new builds or space that is renovated. As the CRTC offices pre-date these standards, it does not comply with the newer elements of the standard. CRTC could explore independently conducting built environment audits for accessibility (e.g., the Rick Hansen Foundation conducts these types of audits) or speaking with PSPC to advocate to have the space assessed for accessibility. The goal would be to identify areas of improvement to accessibility, including standards that were created after the CRTC occupied its space. Since there seems to be a current gap in knowledge about the accessibility of the built environment, this would provide important information and identify opportunities for improvement.

Opportunity # 14: Evaluate structural layouts and policies about environmental and sensory factors within the built environment (e.g., scent, lighting, noise).

The CRTC has undertaken steps to address environmental and sensory barriers (e.g., using dimmers, increasing awareness about scents). However, there are still significant barriers in the organization's accessibility based upon the employee survey. It would benefit the CRTC to look at the policies they already have in place to determine how they could better achieve their objective.

It is also important to look at barriers related to the presence of environmental and sensory concerns when it comes to determining any layout changes in CRTC's offices. This is especially important as CRTC is moving between buildings and updating their current office. If open concept office spaces will be the norm, the CRTC should ensure that these accessibility concerns are addressed.

Opportunity # 15: Collect data from employees and the public about accessibility concerns surrounding CRTC's built environment.

Another way for CRTC to increase knowledge and be less reactive would be to gather the experiences of employees, stakeholders, and the public about barriers they have encountered.

Opportunity # 16: Address built environment issues that are easy-fixes and that the CRTC could act upon while awaiting longer-term changes.

In gathering feedback about its built environment, the CRTC should consider prioritizing these issues and determining which ones it would be able to address. These would be called "easy fixes" that do not require structural changes. This would support better built environment accessibility at the CRTC despite external constraints.

Opportunity # 17: Advocate with PSPC for proactive and continuous improvements to the accessibility of the CRTC built environment.

Finally, we want to reiterate that we recognize the external constraints on the CRTC in this area. With knowledge gathered from feedback and audits, CRTC could work with PSPC to call for them to address and fix any built environment concerns that exist. This involves commitment from CRTC leadership to work with PSPC and to ask for larger-scale improvements to the built environment to be made. While major changes may not be possible at this time, minor changes may also make the space more accessible pending commitment to more extensive changes.

## 4.4 Information and Communication Technology (ICT)

### 4.4.1 Successes

The IT team at the CRTC has already implemented many processes and policies that have moved them towards greater accessibility. The work and progress that has occurred in this priority area is commendable.

A highlight would be that the CRTC has built in accessibility considerations at all stages of the process of developing and deploying its systems. This demonstrates both proactive and reactive stances. Embedding accessibility considerations in the development stages ensures that there will be fewer barriers that users experience and accessibility changes and mitigations that need to be made. Staff have built in internal procurement standards and processes to improve on aspects of procurement that the CRTC can control. They are also developing and maintaining accessibility standards for IT.

In this priority area, as well, there seems to be greater training and education on accessibility that is already occurring, including the [Deque University Web Accessibility Training Package](#) and the [Accessibility, Accommodation and Adaptive Computer Technology Program \(AAACT\)](#).

The following are examples of how the CRTC has already worked on accessibility when it comes to supporting information and communication technology:

- Allow employees to download apps to meet their needs without having to go through IT approval.
- Purchase licenses of specific software and utilities (e.g., JAWs) to test accessibility against current standards.
- Use both automated and manual processes for internal and external tools and sites to test for accessibility using the Web Experience Toolkit.
- Review systems for accessibility as they get refreshed and renewed.

## 4.4.2 Barriers

ICT1: The Internal Web Applications package has programs that are older and are not accessible (e.g., Application Support System).

Another accessibility barrier is that CRTC's considerable number of internal websites and pages contain features that are older and are not accessible. An example that they brought up was the Application Support System. This is a CRTC-specific software application that allows staff to manage broadcasting and telecommunications applications and their relevant documents.

It is important to note that the IT team interviewed were able to speak in detail about what the gaps currently are, what steps they have already taken, and what steps they would like to take. While this is a current gap, we have a certain level of confidence that this barrier is both being addressed currently and part of the plan for improving IT accessibility going forward.

In terms of internal sites and applications, the IT experts identified that they are currently in the process of redeveloping and migrating what they can. However, this will take a long time as the project is large and there are understandable time and budgetary constraints. They have identified that they are committed to continuing this process through CRTC's first accessibility plan.

ICT2: There may be a gap in testing for accessibility as it relates to diverse types of disabilities.

A gap may exist that accessibility is tested for certain disabilities but not others. In the interviews, testing for persons with vision disabilities was mentioned. However, there was no explicit mention of testing with people who are neurodivergent, people with physical disabilities, or people with learning disabilities.

ICT3: The external website has undergone significant improvement. However, it still has areas with navigability and usability issues. This includes aspects such as their online web forms.

Website accessibility extends beyond specific technical requirements. Accessibility includes the ability to easily maneuver through the site to find needed information. There are still known issues with the CRTC's external website. While CRTC has done testing in terms of its accessibility through both the development and deployment phase, users still reported some difficulty navigating and using it and its elements (e.g., online web forms).

CRTC is both aware of this issue and proactively working to address it. One step that has proven this commitment is how they build in accessibility testing into multiple stages of web development processes.

ICT4: Some IT systems and tools available to employees are not easy to use, accessible, or customizable to their needs.

Some survey respondents highlighted accessibility issues that they have with some of the systems and tools that are available to them. These were also highlighted through the internal summary document feedback process. These include:

- Document manager (DM), a CRTC-specific document management system, search screen is too small and hard to read.
- Cellphones that do not have home buttons and are completely touchscreen.
- Software: ensure customizability/configurability; screen readers; enabled colour contrast.
- Teams: enable video record function so meetings can be revisited; enable captioning outside of the administrator; presented documents (i.e., using the share-screen function) are hard to read.

While some of the tools used at the CRTC, in fact, do have accessibility features, the issue is that staff may not be aware and may not contact the IT department for support. A couple of respondents also indicated that they did not receive the technological accommodations they requested, such as an Adobe Acrobat Pro license. While we are unable to ascertain if this is a major issue, the CRTC may consider evaluating their policies and data in this area to see if any improvements can be made.

ICT5: The CRTC website does not allow video submissions to be uploaded to Commission proceedings. Participants must find a third-party provider to host their submissions.

It was noted in the stakeholder feedback that the CRTC website does not support the uploading of video submissions from the public. The file size limits for uploads are often insufficient for the level of detail requested in the submission. For longer videos participants must make use of third-party platforms like YouTube to post the full submission. This requires participants to set up an account on the platform, upload the video, and then share the link. This is an added hurdle to the submission process that requires technological and internet resources and literacy. Having to use multiple platforms and keeping accurate records of which submissions are where and correspond to the correct links increases the complexity of filing a submission.

ICT6: IT staff and other CRTC employees may not have the knowledge to support employees in terms of what accessible ICT tools they have access to.

The process to request ICT related accommodations is not clearly defined. Nonetheless, the IT help desk will play a role in at least some accessibility requests (e.g., hearing aid compatible headsets, magnification, and dictation software). Staff acknowledged that there may be issues in terms of help desk staff's own knowledge about disability and accessibility measures.

This could prevent the implementation of accessibility measures that are already built-in to IT systems or require that a formal accommodations process be used unnecessarily. This

could also unnecessarily complicate the process for people with disabilities. For example, they may be made to shuffle their concerns across different parts of the CRTC, unclear about who has knowledge and responsibility in this area.

The IT team identified a problem of employees not being aware of what types of accessibility tools they are able to request. If they do not know what is available, they may miss requesting IT equipment or software that could significantly improve their experience and address any accessibility gaps they experience.

### 4.4.3 Opportunities

Opportunity # 18: Maintain accessibility testing for internal and external websites, including the possibility of periodic audits to ensure that they meet changing accessibility standards and best practices.

CRTC is currently doing a good job in the field of accessibility testing, including building accessibility concerns through processes of development and deployment. The CRTC has also committed to the ongoing user testing of their websites. Unfortunately, they have run into barriers in terms of the implementation of this plan (e.g., time, budget, personnel resourcing). We suggest that the CRTC consider how to minimize these implementation barriers and ensure that this process is fully supported.

In addition to continuing the work that is currently underway, the CRTC could consider investing in periodic audits of existing systems to ensure that they have not become outdated, despite meeting past accessibility standards, and employing feedback processes to gather additional perspectives on accessibility.

It is important to note that, for most audits, this would only require the testing of a sample of websites and tools rather than a full audit. As such, while it may seem like a daunting and protracted process for CRTC to undertake, including cost and time commitments, it does not necessarily have to be so.

Opportunity # 19: Commit to a workplan for making existing inaccessible tools and apps accessible.

This opportunity was identified by CRTC's IT team itself, which enthusiastically supported the idea that they could make commitments to improving what they can in CRTC's first accessibility plan. There are certainly constraints in this area. Due to the significant scope of the project, it may be unreasonable or unfeasible for CRTC to commit to full accessibility of their IT systems at the end of the three years. However, there is an opportunity here, based on CRTC's evident commitment, to continue their work on this in a systematic and forward-thinking manner.

Opportunity #20: Consider increasing the file size limit to allow for more detailed submissions to the Commissions proceedings and evaluate whether an in-house video submission platform is feasible long-term.

Participants at all consultation meetings and those who provided written feedback stressed that increasing the file size limit and allowing for direct hosted submissions to the CRTC website would reduce the complexity of the submission process and improve accessibility, particularly for the Deaf community and Deaf advocacy stakeholders.

Opportunity # 21: Evaluate current technological systems and tools used by CRTC employees and address the gaps in their accessibility (i.e., the accessibility of document management systems, Microsoft Teams, Adobe Suite).

As indicated in the barriers section, systems such as DM and software such as Microsoft Teams have accessibility barriers, including difficulties in navigability and readability. We suggest that the CRTC evaluate these two systems to determine whether they can be customized to eliminate these barriers or if they need to be replaced if these barriers cannot be reduced. We also suggest that this be done for other systems and software that the CRTC uses that may not have come up in this survey.



## 4.5 Communication (other than ICT) (C)

### 4.5.1 Successes

In terms of communications, the CRTC has also done great work already in terms of improving its accessibility, including going beyond what many organizations have done or committed to.

The CRTC has had significant success in ensuring that hearings are as accessible as possible. This includes what accessibility features are available in hearing areas, supporting alternative formats of documentation to be provided, and ensuring that accessibility gaps are addressed at the time of hearings. This includes the use of video relay service and text messaging to communicate with participants in advance of the hearing, the use of headsets for everyone, and the presence of a Hearing Secretary to address last minute concerns (including accessibility issues). They are also aware of the importance of ASL/LSQ interpretations, interpreters, intervenors, making transcripts available quickly after proceedings, presenting information in HTML on the CRTC website, providing access for service animals, and ensuring that these needs are easily accommodated in the process. CRTC has identified that live video streaming with Communication Access Realtime Translation (CART) will be standard for hearings going forward.

The CRTC proactively ensures ASL and LSQ interpretation at hearings that it knows have issues that relate to accessibility (e.g. Video Relay Service hearings). For hearings on topics that do not appear to relate to accessibility, the CRTC decides on a case-by-case basis what accommodations to provide.

The CRTC is also ensuring that their website has an online form that allows visitors to submit accessibility concerns. In this same vein, they have also adopted what is called a “no wrong door” approach. Through this approach, they provide information and assistance to ensure that members of the public can have their concerns addressed by the appropriate agency if they fall outside CRTC’s area of responsibility. The CRTC also ensures a seamless handoff process, to directly assists these individuals to connect with

the right contact person within the right organization for their concerns, reducing confusion, bureaucratic red tape, and additional steps on the part of the individual.

It was also mentioned that the CRTC has improved on the provision of alternative communications methods, including moving the teletypewriter (TTY) to a virtual setting and introducing chat bots. While there may still be accessibility issues that arise with these, they also show that the CRTC is actively trying to address and improve upon this service.

The CRTC has also indicated that it has a good awareness of how to incorporate alt text and ensure appropriate colour contrast for their websites.

While plain language it is still a major barrier at the CRTC, the interviewees revealed that CRTC's templates have been reviewed for plain language. In an email, we also discovered that the CRTC has employed the [Flesch-Kincaid scale](#) to measure language level in their ASL and LSQ videos and web content. We consider these to be successes, although it is still important for the CRTC to identify and address the major gaps that still exist in this area, why they exist, and how to lessen them.

CRTC is also working to ensure that the documents submitted by parties to a hearing are in accessible formats. This is achieved by directing parties to submit documents in accessible formats, providing guidance on how to do that, and requesting that a party adjust document formats if requested by a person with a disability. We note that the CRTC is not validating the accessibility of documents that parties submit.

The following are examples of how the CRTC has already worked on the accessibility of its communications:

- Static webpages for [crtc.gc.ca](http://crtc.gc.ca) are accessible.
- Web publishers are well-versed in and comply with Web Content Accessibility Guidelines (WCAG) 2.0 requirements.
- Disability representation in developed graphics and content.

- Developed graphics and content are tested for colour contrast and that they meet relevant style guides and standards.
- Ensure the current Zone intranet site meets WCAG 2.1 Level AA.
- Contracting with consultants to assess and audit the new intranet to be developed.
- Online support centre is accessible.
- ASL/LSQ videos are provided as much as possible.
- Documents in HTML and PDF comply with WCAG 2.0 guidelines.
- Templates of decisions, notices, and orders DNOs are in line with WCAG 2.0 standards and are readable by screen readers and other accessible software.
- TTY is now digital, and its use is being supported across Client Services staff.
- Interactive Voice Response (IVR) systems are being replaced, in collaboration with [Shared Services Canada](#).
- Accessibility complaints, questions, or comments are tagged in the internal client services database and prioritized.
- Allow for alternative ways to submit interventions for interested parties with disabilities (e.g., email, phone, sign language).

#### 4.5.2 Barriers

C1: There needs to be more training and organizational buy-in to adopt plain language.

A clear accessibility barrier that was identified by most interviewees and consultation meeting attendees was the lack of plain language in the CRTC's documents. Staff indicated that they have made strides in terms of general communication with the public (e.g., social media, announcements, website). A major issue is in the writing of decisions and notices which tend to revert to legal jargon. One survey respondent called this language "Commission-ese" language" that "is entirely impenetrable to most Canadians, especially those with reading challenges or New Canadians". One consultation attendee noted that

each time the CRTC releases a directive, notice, or order, they personally undergo the task of translating the document into plain language and ASL.

While CRTC has made strides in this area (e.g., testing using the Flesch-Kincaid scale, undergoing some plain language training, exploring hiring a plain language expert), this is still an existing barrier that needs to be addressed.

As a regulator the CRTC cannot fully escape legal jargon. However, more progress can be made. Importantly, they have also identified the need for institutional buy-in to this idea. They have identified issues understanding the need for plain language as a principle and, thus, the potential to change or edit what they have written.

We raised the possibility of hiring a plain language expert in the Communications team specifically. As the CRTC has appeared to be receptive to a full-time accessibility-related position being created, promoting plain language could be a key responsibility for this individual or a separate position. Note that there are cost implications for these changes.

C2: ASL/LSQ translation will no longer be offered by the CRTC's previous provider, which affects the provision of information in both these languages going forward.

Both subject matter expert interviewees and employees identified this as a key barrier and loss for their ability to provide more information in ASL and LSQ. CRTC has made a commendable commitment to providing this service as much as possible over the past few years on a proactive basis. However, this change will significantly hinder their ability to continue to do so and may impact the timelines and quality of interpretation.

It is important to note that, in one interview, it was mentioned that CRTC may be proactively looking to build a budget to procure services that will be able to do this for them in the future. We note that there are cost implications for these changes.

C3: None of the most frequently accessed content on the CRTC’s website is directly available in ASL, LSQ, or Indigenous Sign Languages.

It was noted during one of the consultation meetings that the CRTC does not have decisions, orders, forms, templates, or other frequently accessed pages posted in sign languages. This presents a significant barrier to deaf individuals who would like to engage with the CRTC. Consequently, deaf individuals are sometimes unable to provide feedback that the CRTC has asked for. Or they must decide whether to have the content translated into sign language or risk not fully understanding the content.

C4: The timelines for sign language submissions to the CRTC’s proceedings may be too short given work involved in producing these video submissions.

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“The production of ASL and LSQ videos represents a substantial commitment. Videos require advance planning, notably for studio facilities and to secure suitable production and interpretation resources. When videos are required, [we] must produce material for filing with the Commission in 4 languages: first, written French and written English, which then must be adapted for sign language presentation and then produced in ASL and LSQ video format.” – Organization

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The CRTC noted that the market availability of interpreters and production studios knowledgeable on creating sign language videos is lower than the demand for these services. Having restricted timelines in the face of this low market availability presents a barrier to people with disabilities and the organizations that advocate on their behalf.

C5: While CRTC is consultative, there are gaps in terms of which disabilities are represented in these consultations and, as such, decisions or regulatory changes may be unreflective of certain disability groups.

A gap that was mentioned during the interviews was the lack of success in consulting with groups representative of individuals with cognitive or intellectual disabilities. It is important that there is a concerted effort to ensure that all disabilities are represented, starting from understanding why a gap exists and formalizing processes and relationships that ensure that there is continuous collaboration and communication with these groups.

C6: There is a gap in outreach to individuals about what CRTC does and how it can help or support people.

CRTC staff highlighted the need to engage in greater outreach to ensure that they are aware of CRTC's mandate and how it supports the Canadian people. Increased outreach means that telecommunications or broadcasting accessibility concerns that individuals have will be brought to CRTC's attention, where previously they might have gone unreported.

C7: The CRTC cannot communicate directly with Canadians in sign languages. Instead, the CRTC relies on emails to communicate in English or French with Deaf Canadians.

It was noted in a consultation meeting that the CRTC does not have Deaf employees and so interactions with Deaf stakeholders frequently take place via email. This presents a significant barrier for people who are culturally Deaf. These peoples' first language and primary mode of communication is a sign language. Not having ready access to employees who are able to communicate with Deaf individuals and stakeholder groups in their primary language was stressed as a significant barrier to Deaf people's meaningful participation in the CRTC's proceedings and in consultations.

### 4.5.3 Opportunities

Opportunity # 22: Continue to implement the plain language style guide to ensure that it is used for all forms of communication and that all staff are trained on it.

To support the adoption of plain language across the organization, the CRTC Decisions team developed a style guide that could be easily referenced by CRTC employees and provided training on plain language. The CRTC could continue these efforts to implement the plain language guide across different teams.

It would be particularly beneficial for the CRTC to ensure that this style guide provides guidance on how to move away from legalistic jargon to the most reasonable extent possible. While it may not be possible for the CRTC to move fully away from this language based on their mandate, they can move the needle on this as much as possible and provide guidance in this style guide. For example, staff could work together to develop a shared vocabulary of acceptable plain language alternatives to technical language. Doing so proactively would ensure institutional support for changes in language. The CRTC could provide plain language alternatives in addition to the legalistic version of documents that must include this language.

Opportunity # 23: Create a plan to ensure that ASL/LSQ translation can continue despite current developments.

This opportunity is one that is already being addressed by CRTC according to an interview and is in its beginning stages. According to the subject matter expert interviews, CRTC is currently looking into contracting with a company to do this and building this into their budget.

CRTC could continue to explore this in accordance with their past efforts to provide as much information as they can in ASL and LSQ.

Opportunity # 24: Implement a formalized process for various types of accessible documentation to be easily submitted and filtered within the CRTC.

CRTC has done a great job of being responsive to the needs of those who communicate with them. However, there are ways in which this can be strengthened. Having an informal approach could lead to a lack of consistency across the board and the potential for the loss of this policy as current CRTC staff move on. As such, to build institutional knowledge and commitment, it may be important to have a written and formalized process wherein alternate forms of communication or documentation can simply be submitted without there needing to be a discussion or a determination of its necessity. For example participants would like the CRTC to allow sign language submissions in all proceedings. This would, among other things, require increasing the file size limit and a change to Rules of Procedure.

Opportunity # 25: Develop a plan and dedicate the appropriate resources to translate the most frequently accessed areas of the CRTC website into sign language.

According to roundtable participants, one of the biggest accessibility improvements the CRTC can make would be to translate the most frequently accessed pages of the CRTC website.

Opportunity # 26: Make concerted efforts to ensure that all consultation processes are reflective of all types of disabilities, particularly when it comes to consulting on decisions and regulatory policies.

CRTC should work to ensure that the needs of individuals with diverse disabilities are met. This means that it is vital that consultation processes are reflective of this diversity as well. The CRTC could consider convening a working or advisory group of people with disabilities to advise the commission. The CRTC could also work with advocacy organizations to define their role in providing feedback and explore new relationships with groups that are



currently not represented. Consultation participants also stressed the need for engagement to occur not just through the CRTC's head office in the National Capital Region, but through all the regional commission offices.

## 4.6 Design and Delivery of Programs and Services (D)

The CRTC is an independent regulator and does not design or deliver government programs and services. We have identified barriers and opportunities that relate to the CRTC's proceedings, like its public hearings, and to its client support centre. All of these barriers are in how the CRTC communicates with the public and can be found in [Section 4.5 Communications \(other than ICT\)](#) in this report.

## 4.7 Procurement (P)

### 4.7.1 Barriers

P1: Digital procurement processes rely on [Shared Services Canada](#) without confirming how accessibility is considered in those processes.

The CRTC relies on [Shared Services Canada](#) (SSC) when buying digital technology. Staff reported that they rely on the accessibility checks that SSC completes and do not fully validate the accessibility of products procured through SSC. We are not aware of the scope of the accessibility validation that SSC completes, but there are certainly accessibility gaps in all technology including those procured through SSC.

Staff reported that they do not consistently review the Accessibility Conformance Reports (ACRs) of procured software or have the expertise to do so. This seems to be done for specific cases, but not for the organization as a whole or the staff that would be using the software in question. For example, the IT team highlighted how, even if they cannot control procurement, they engage in discussions informally with companies to discover how

accessible their products are. In knowing this, the IT team would become aware not only of the gaps in the products they are using, but they would also be able to offer suggestions on alternative options and be able to respond to any concerns brought up by CRTC's internal and external stakeholders.

P2: Accessibility is not a routine consideration in procurement.

We understand that accessibility is not currently a routine consideration in procurement, such as in a procurement checklist or other resource. As a result, the CRTC may be procuring goods and services that do not incorporate accessibility. Inconsistency inevitably leads to accessibility concerns falling through the cracks, whether they remain hidden or are known but are not actioned. A consistent and standardized process would ensure that commitment and responsibility to accessibility is a guarantee across all CRTC's operations and systems. The Treasury Board Secretariat's Directive on Management of Procurement states that Business Owners:

4.2.7.1 Where appropriate, including accessibility considerations when specifying requirements for goods, services and construction, and ensuring that deliverables incorporate accessibility features;

4.2.7.1.1 Ensuring clear justification is documented if it is determined that accessibility considerations are not consistent with modern treaties or trade agreements, or if it is not appropriate to include them as part of commodity specifications, or if it is not possible to obtain goods, services or construction that comply.

The Treasury Board Secretariat's Guidelines to Contracting Policy (the predecessor of the Treasury Board Secretariat's Directive on Management of Procurement), ensuring accessibility via Public Procurement further states that:

Users with distinct needs should be engaged from the outset to ensure that deliverables can be used by people representing a wide range of functional abilities... Compliance with accessibility standards may not be enough to ensure accessibility. Consult with users and groups representing persons with disabilities to ensure whatever accessibility criteria are used will result in truly accessible products, services and structures.

The Ontario government has several examples of what accessibility considerations look like in practice and questions that staff can ask of themselves and vendors. That guidance reads: “Omar is opening a new university office downtown. When viewing possible locations, Omar looks for a visible alarm system to alert people with hearing loss. He also looks for elevator buttons that use raised lettering for people who are blind.”<sup>9</sup>

It also lists examples of questions to ask. For goods, the Ontario guidance provides the following suggestions:

- “Can the product be used, for example, by someone:
  - in a seated position?
  - using one hand, with limited upper body strength?
  - with limited fine motor skills?
  - with vision loss or low vision?
  - with hearing loss?
  - with limited cognitive ability/memory?
  - if accompanied by a service animal?
- Does the product meet ergonomic standards?
- Can the product be customized to meet different needs?

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<sup>9</sup> <https://www.ontario.ca/page/accessibility-rules-procurement> retrieved Nov 2nd, 2022

- Are instructions for using the product clear and easy to follow?”<sup>10</sup>

#### 4.7.2 Opportunities

Opportunity # 27: Build institutional knowledge and policy frameworks at the CRTC related to the procurement of products and services.

The CRTC should ensure that accessibility is built into all their organizational procurement requirements and contracts. This should include adding accessibility considerations to procurement and contracting checklists, just as official language requirements are considered for all procurements.

Opportunity # 28: Clarify how much Shared Services Canada (SSC) considers accessibility of the digital products.

In interviews, staff were not sure how much SSC considered accessibility when identifying software products for use. The CRTC could clarify its understanding of the accessibility standards used by SSC and what role CRTC can play in reviewing accessibility information when procuring or implementing software.

Opportunity # 29: Develop a checklist of accessibility needs when choosing external spaces for CRTC’s operations as needed.

The CRTC is committed to ensuring that any external spaces that they use are accessible when booking them. As it stands, the CRTC ensures this through a staff member’s knowledge and commitment. The staff member knows what to look for in terms of accessibility features and uses that knowledge to make decisions. CRTC staff indicated that they would like to create a checklist that sets out these accessibility considerations. This would help to make sure this knowledge continues. This is key because it ensures a common standard of accessibility across the organization and minimizes dependency on

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<sup>10</sup> <https://www.ontario.ca/page/accessibility-rules-procurement> retrieved Nov 2nd, 2022

the knowledge of specific individuals. The use of a checklist also provides a more formal method for the CRTC to be able to measure and monitor its accessibility in this area.

## 5 Conclusion and Next Steps

Barriers exist across a spectrum at the CRTC. Some barriers have been addressed, while some barriers exist but have undergone significant progress in recent years. In this report, we have endeavoured to make these distinctions to properly capture the work that the CRTC has already done and those already committed to. Nevertheless, even when these barriers are in the process of being addressed, they still exist and, as such, would be important for the CRTC to be aware of and mention in their accessibility plan. This would also support the CRTC in prioritizing and categorizing the accessibility initiatives in their first accessibility plan, with barriers that are already being addressed being commitments that the CRTC would be able to make over the course of the first three-year cycle.

In this report, the identified successes, barriers, and opportunities are based on feedback unpacked through a document review, subject matter expert interviews, the employee survey, the public consultation meetings, and the stakeholder surveys. The CRTC will now need to decide what actions it can commit to and complete within the three years of its accessibility plan.

# Appendix 1: List of Barriers

## General

G1: There is an overall need for more knowledge about accessibility to be built into each sector of the CRTC and with each CRTC staff member.

G2: There are gaps in terms of ensuring broader consultation processes with persons with various disabilities.

## Employment

E1: Managers lack the training, resources, and knowledge to support their staff's accommodations.

E2: There is a gap in knowledge and attitudinal barriers around mental health disabilities, cognitive disabilities, other non-apparent or invisible disabilities, and neurodivergence.

E3: There are accessibility barriers that can be found in CRTC's hiring processes.

E4: The accommodation process may be unclear, potentially due to insufficient communication or decentralization.

E5: Proof of need in requesting accommodations may be prohibitive for employees with disabilities to go through the process.

E6: Culture of meetings and time pressures pose barriers for some employees with disabilities.

## Built Environment

B1: Employees report many built environment issues related to environmental disabilities or sensitivities.

B2: Open concept, hotelling office environments erect accessibility barriers for employees.

B3: The accessibility of the built environment is tied to complying with standards and responding to requests instead of striving for full accessibility.

B4: There are known accessibility issues within the built environment that need to be addressed (e.g., turning space in washrooms for wheelchairs).

## Information and Communication Technologies (ICT)

ICT1: The Internal Web Applications package has programs that are older and are not accessible (e.g., Application Support System).

ICT2: There may be a gap in testing for accessibility as it relates to diverse types of disabilities.

ICT3: The external website has undergone significant improvement. However, it still has areas with navigability and usability issues. This includes aspects such as their online web forms.

ICT4: Some IT systems and tools available to employees are not easy to use, accessible, or customizable to their needs.

ICT5: The CRTC website does not allow video submissions to be uploaded to Commission proceedings. Participants must find a third-party provider to host their submissions.

ICT6: IT staff and other CRTC employees may not have the knowledge to support employees in terms of what accessible ICT tools they have access to.

## Communication other than ICT

C1: There needs to be more training and organizational buy-in to adopt plain language.

C2: ASL/LSQ translation will no longer be offered by the CRTC's previous provider, which affects the provision of information in both these languages going forward.

C3: None of the most frequently accessed content on the CRTC's website is directly available in ASL, LSQ, or Indigenous Sign Languages.

C4: The timelines for sign language submissions to the CRTC's proceedings may be too short given work involved in producing these video submissions.

C5: While CRTC is consultative, there are gaps in terms of which disabilities are represented in these consultations and, as such, decisions or regulatory changes may be unreflective of certain disability groups.

C6: There is a gap in outreach to individuals about what CRTC does and how it can help or support people.

C7: The CRTC cannot communicate directly with Canadians in sign languages. Instead, the CRTC relies on emails to communicate in English or French with Deaf Canadians.

## Procurement

P1: Digital procurement processes rely on [Shared Services Canada](#) without confirming how accessibility is considered in those processes.



P2: Accessibility is not a routine consideration in procurement.

## Appendix 2: List of Opportunities

### General

Opportunity # 1: Develop relationships with groups connected to communities of persons with cognitive and intellectual disabilities to better gather their feedback.

Opportunity # 2: Create a position for an accessibility expert that could be a resource across the organization.

Opportunity #3: Solicit accessibility feedback on a proactive basis and commit to a meaningful engagement strategy with the disability community, in addition to the ACA required feedback mechanism.

### Employment

Opportunity # 4: Develop a professional learning and development plan that is specific to accessibility.

Opportunity # 5: Focus on manager training on accessibility, including any type of training courses or workshops and continuous and formalized communication within the CRTC.

Opportunity # 6: To the extent possible, continue flexible work arrangement policies, including the CRTC Telework agreement and guides teleworking.

Opportunity # 7: Continue to monitor and explore the availability of Canadian School of the Public Service (CSPS) courses related to accessibility and disability to employees as they become available. Search for other opportunities that may exist outside of this structure.

Opportunity # 8: Explore and implement processes to solicit accessibility concerns internally that are not reliant on employee self-identification.

Opportunity # 9: Review job postings and hiring practices in consultation with persons with disabilities to identify and remove language or processes that are not-disability friendly.

Opportunity #10: In addition to hiring more people with disabilities, the CRTC could aim to specifically hire Deaf staff. This would support Deaf members of the public to communicate in their first language to the CRTC without needing an interpreter.

Opportunity # 11: Review and revise CRTC's accommodations process and develop an internal document that reflects these changes.

Opportunity # 12: Implement workplace norms that require standard meeting-free hours; breaks between meetings; and/or breaks during longer meetings.

## Built Environment

Opportunity # 13: Undertake audits of CRTC's built environment that include compliance with modern accessibility best practices. These modern best practices came into place after the CRTC moved into its space.

Opportunity # 14: Evaluate structural layouts and policies about environmental and sensory factors within the built environment (e.g., scent, lighting, noise).

Opportunity # 15: Collect data from employees and the public about accessibility concerns surrounding CRTC's built environment.

Opportunity # 16: Address built environment issues that are easy-fixes and that the CRTC could act upon while awaiting longer-term changes.

Opportunity # 17: Advocate with PSPC for proactive and continuous improvements to the accessibility of the CRTC built environment.

## Information and Communication Technologies (ICT)

Opportunity # 18: Maintain accessibility testing for internal and external websites, including the possibility of periodic audits to ensure that they meet changing accessibility standards and best practices.

Opportunity # 19: Commit to a workplan for making existing inaccessible tools and apps accessible.

Opportunity #20: Consider increasing the file size limit to allow for more detailed submissions to the Commissions proceedings and evaluate whether an in-house video submission platform is feasible long-term.

Opportunity # 21: Evaluate current technological systems and tools used by CRTC employees and address the gaps in their accessibility (i.e., the accessibility of document management systems, Microsoft Teams, Adobe Suite).

## Communication other than ICT

Opportunity # 22: Continue to implement the plain language style guide to ensure that it is used for all forms of communication and that all staff are trained on it.

Opportunity # 23: Create a plan to ensure that ASL/LSQ translation can continue despite current developments.

Opportunity # 24: Implement a formalized process for various types of documentation to be easily submitted and filtered within the CRTC.

Opportunity # 25: Develop a plan and dedicate the appropriate resources to translate the most frequently accessed areas of the CRTC website into sign language.

Opportunity # 26: Make concerted efforts to ensure that all consultation processes are reflective of all types of disabilities, particularly when it comes to consulting on decisions and regulatory policies.

## Procurement

Opportunity # 27: Build institutional knowledge and policy frameworks at the CRTC related to the procurement of products and services.

Opportunity # 28: Clarify how much [Shared Services Canada](#) (SSC) considers accessibility of the digital products.

Opportunity # 29: Develop a checklist of accessibility needs when choosing external spaces for CRTC's operations as needed.