

# Library and Archives Canada's Accessibility Progress Report 2023

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Library and Archives Canada's Accessibility Progress Report 2023

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Bibliothèque et Archives Canada 2023

# **TABLE OF CONTENTS**

General	4
Report summary	4
Contacting LAC	5
Progress under the Accessible Canada Act priority areas	6
EMPLOYMENT	6
THE BUILT ENVIRONMENT	7
INFORMATION AND COMMUNICATIONS TECHNOLOGIES (ICT)	8
COMMUNICATION, OTHER THAN ICT	9
THE PROCUREMENT OF GOODS, SERVICES AND FACILITIES	10
THE DESIGN AND DELIVERY OF PROGRAMS AND SERVICES	11
TRANSPORTATION	12
Consultation	13
Feedback	15
Additional priority area: Culture change	19

# **General**

# **Report summary**

LAC's first <u>Accessibility Plan</u> is based on consultations with people living with disabilities—users of LAC's services and programs, as well as employees. The Plan uses recommended tools and processes to assess the institution's accessibility readiness. Results have shown that LAC must improve accessibility by proactively identifying and eliminating barriers.

This Accessibility Progress Report gives details about what was achieved under the <u>priority areas</u> of the *Accessible Canada Act* during the first year of implementing LAC's Accessibility Plan, with some contextual observations on progress.

It should be noted here that in its Accessibility Plan, LAC omitted the priority area of <u>transportation</u>. Although progress in this area cannot be reported, consultations have begun on aspects of transportation that may be relevant to the institution.

By establishing a dedicated <u>Equity</u>, <u>Diversity</u>, <u>Inclusion and Accessibility</u> (<u>EDIA</u>) <u>Centre of Excellence</u>, LAC is laying the groundwork to more effectively eliminate barriers encountered by users who live with disabilities.

<u>Feedback</u> received in 2023 on LAC's Accessibility Plan and accessibility experience demonstrates that promoting workplace accommodations is a priority.

LAC takes note of all these elements and feedback with the intention of incorporating meaningful change in updates to its Accessibility Plan in 2024.

# **Contacting LAC**

To provide feedback on accessibility, communicate with LAC and obtain copies of LAC's Accessibility Plan and Progress Reports in other formats

## **Primary Contact**

Library and Archives Canada, Accessibility Champion

## Mail

Accessibility—Library and Archives Canada 550 de la Cité Blvd. Gatineau, Quebec J8T 0A7

### **Email**

Accessibilite-Accessibility@bac-lac.gc.ca

# Phone

819-921-4547

## **TTY phone**

Call 613-992-6969 (Canada's National Capital Region) or toll-free 1-866-299-1699 (elsewhere in Canada) Monday to Friday, 9 a.m. to 5 p.m. ET.

# **Providing feedback**

To leave feedback either on LAC's Accessibility Plan or on barriers encountered at LAC, or for more information about how feedback is handled at LAC, please refer to the <a href="accessibility feedback">accessibility feedback</a> <a href="mailto:mechanism">mechanism</a>. You may add your name and contact information if you would like LAC to follow up with you on your comments or feedback. If you prefer to submit feedback anonymously, you can do so by omitting your name and other identifiers from your message.

## Other formats

You can use any of the communication channels outlined above to request alternate formats of this Plan, such as print, large print, audio, Braille or electronic formats compatible with adaptive technologies.

# Progress under the Accessible Canada Act priority areas

# **EMPLOYMENT**

#### **Barriers**

LAC's 2022 Accessibility Plan identified specific barriers in workplace accommodations:

- Workplace accommodations are perceived as a financial burden for the administrative unit in which the person with a disability works.
- Employees are not sufficiently aware of self-identification or workplace accommodations and where to obtain them.

Eliminating these two specific barriers is part of the Plan's goals in the immediate term.

#### Solutions

Adopt the Government of Canada Workplace Accessibility Passport.

- September 27, 2023: Two presenters from the Office for Public Service Accessibility explained the Government of Canada (GC) Workplace Accessibility Passport to LAC's managers and executives.
- LAC employees were informed about the Passport via internal communication and asked to sign up for information sessions to learn more about it.
- October 31 and November 14, 2023: Two information sessions were offered to employees.
   More sessions will be made available as needed.

Raise awareness about self-identification as a person living with a disability.

 LAC's Human Resources and Security Branch (HRSB) is currently preparing to implement the new Treasury Board of Canada Secretariat (TBS) modernized self-identification form. A promotional and awareness campaign is planned to encourage self-identification at LAC.

Raise awareness about accommodations and how to obtain them.

- A message from LAC's Accessibility Champion was shared during Accessibility Week and included a lived-experience story by one LAC employee.
- As part of the GC's Hybrid Work Model Orientation and the LAC Hybrid Work Model Directive, employees requiring accommodations were invited to submit an exemption request using the internal process.
- An ergonomic equipment request process is being developed and will be communicated to LAC managers and employees in winter 2024.
- o LAC's HRSB is in the process of strengthening its one-stop service for accommodation requests.
- o LAC's HRSB is currently proceeding with its Employment System Review.

## Remarks on progress

LAC's HRSB is dedicated to fully implementing the GC Workplace Accessibility Passport and to increasing awareness about self-identification as well as obtaining accommodations. It is actively working to ensure clarity and foster an environment where employees and managers can confidently engage in the accommodations process.

## THE BUILT ENVIRONMENT

### **Barriers**

LAC's 2022 Accessibility Plan identified specific barriers in its built environment:

 Accessibility features of LAC's built environments are not sufficiently communicated to the users and to employees.

Accessibility in all forms must be considered in all aspects of the built environment. This includes lighting, evacuation or emergency plans, way-finding solutions and spaces for neurodiverse needs, as well as other features.

### Solutions

### Immediate Term

- o Accessibility audits have taken place in most LAC facilities.
- For the new joint facility Adisoke, to open to the public in 2026–2027, vast consultations with the public and engagement with Indigenous communities took place. These included targeted consultations on accessibility and inclusivity. Further consultations with the project's Accessibility Advisory Committee generated a report and recommendations.
- The Adisoke Project Team continues to ensure that accessibility and inclusivity measures for clients, visitors and employees that were embedded in the design are maintained in the construction.
- The following actions are planned or have been undertaken for building entrances at LAC's new Preservation Storage Facility:
  - Install voice/visual display intercom to request assistance.
  - Ensure someone is responsible for accepting requests for assistance if required.
  - Paint fixed items or surface areas in contrasting colours.
  - Ensure that building signage is detectable by someone using a cane. Where required, add an obstacle such as a bar, edge or curb.
  - Paint or coat handrails to visually contrast with surrounding surfaces.
  - Install tactile attention indicator along the full width of the top of the stairway landing.
  - Paint or install a visually contrasting marking along the top edge of the stair nosing that wraps onto the stair riser.
- Designated spaces with blue lighting have been installed at LAC's workplace at Place de la Cité, and additional spaces will be made available in every facility.

Revise or establish detailed evacuation plans for each site for people with disabilities (public and employees) and clearly communicate these plans.

 Security works with employees who self-identify as requiring assistance to evacuate to assign monitors to assist them and to develop a personal evacuation plan based on the individual's needs.

Implement formal mechanisms for public and employee feedback on the accessibility of LAC's buildings and data collection.

- There is a new link at the bottom of every page on the LAC website. Users can raise any issues
  that they have encountered while visiting the website, including a barrier or obstacle to
  accessibility, by clicking on "Contact us" and following prompts to enter details.
- Even though it is not a public access facility, LAC's Preservation Storage Facility did internal consultations for the purposes of accessibility; results are forthcoming.
- LAC is currently preparing its accessibility assessment as mandated by TBS.

## Remarks on progress

Detailed evacuation plans are developed for employees who self-identify as people requiring accommodations. For all users with disabilities of LAC's facilities, evacuation plans will be made widely and publicly available.

Much effort and many consultations have been put into the accessible design and construction of LAC's new joint facility, Ādisōke. LAC has exceeded usual standards in ensuring the accessibility of its Preservation Storage Facility.

# **INFORMATION AND COMMUNICATIONS TECHNOLOGIES (ICT)**

## **Barriers**

LAC's 2022 Accessibility Plan identified specific barriers within its ICT processes:

- Employees lack awareness about accessible ICT tools they can use.
- ICT-related accessibility issues are only reported through LAC's generic IT ticketing system, which means there is no tracking of accessibility specifically.
- LAC's procurement process for obtaining ICT products that ensure accessibility had not been fully defined.

Eliminating these specific barriers is part of the Plan's goals in the immediate, mid and long terms.

## Solutions

Immediate term

Instigate accessibility-specific tracking processes and ramp up awareness of accessible ICT tools.

o Tracking for employees' accessibility requests is in place in LAC's generic IT ticketing system.

The sector continues to promote awareness of accessible ICT tools.

### Mid term

Develop findings, recommendations and specific actions to meet new ICT Accessibility Standard.

 Phase 2 of LAC's internal-facing application Military and Government Personnel Information Index (MAGPII) was developed based on the ICT Accessibility Standard and is planned to go in production before the end of December 2023.

Long term and ongoing

Adopt new TBS ICT Accessibility Standard.

 The new ICT Accessibility Standard was planned for release and implementation at the end of March 2023. However, this standard has been delayed, and LAC continues to implement the previous accessibility standard.

Continue to liaise with Shared Services Canada's (SSC) Accessibility, Accommodation and Adaptive Computer Technology (AAACT).

 The ICT sector at LAC continues to liaise with SSC on AAACT and has adopted the technology for internal employees' accommodation purposes.

## Remarks on progress

TBS's most recent ICT Accessibility Standard, announced for March 2023, was highlighted for implementation in LAC's Accessibility Plan. This standard has experienced delays. LAC's EDIA Centre of Excellence, in collaboration with LAC's accessibility advisory group Accessibility Exchange and Dialogue, will consult with LAC's ICT sector once the standard is effective.

# COMMUNICATION, OTHER THAN ICT

## **Barriers**

LAC's 2022 Accessibility Plan identified specific barriers within its communications processes:

- Policy-driven requirements for documents, presentations and other products must be accessible. Where such requirements exist, they occur in isolation. They should also be tracked, documented and promoted.
- LAC's public website meets Web Content Accessibility Guidelines (WCAG) 2.1 AA, but improvements are required.
- Plain language is inconsistently applied in LAC's communications.
- LAC service points respond to accessibility issues on a case-by-case basis, resulting in deficient or non-existent systems and accommodations for diverse communication needs.

Eliminating these specific barriers is part of the Plan's goals in the immediate, mid and long term.

#### Solutions

### Immediate term

Test all existing public-facing LAC web products against the latest ICT accessibility standard.

- All newly developed LAC web content follows the WCAG 2.1 (level AA) standard. Legacy content that may not fully meet WCAG 2.1 standards continues to be updated.
- LAC's current Web Content Management System (WCMS) cannot check accessibility automatically. Validating content for accessibility is all done manually. LAC is looking at new WCMS options that can automate this function.

Review plain language protocols and applicability.

- o LAC reviews all new services and collections content through a plain language lens.
  - Text across the website comes in at a Grade 8 readability level on average.
  - Information is presented in chunks from most to least important.
  - Images have accompanying descriptive text.
  - Video content is closed-captioned.
  - Audio content includes transcripts.
  - Bulleted lists make the pages easy to scan and understand.
  - Content is now organized in easy-to-use templates. These templates come from user experience research done in-house.

## Remarks on progress

LAC's ongoing web renewal efforts continue to make its web presence more accessible. Some accessibility highlights from LAC's web team in 2023:

- Revamped Access to Information and Privacy (ATIP) content with a focus on plain language.
- o Applied templates to align ATIP content with the rest of the website.
- Added a step-by-step online assistant for making ATIP requests. This application helps users navigate what is typically a complex process.
- Launched a new search tool for one of LAC's most popular databases (First World War Personnel Records). The new version uses the Canada.ca template and comes with instructions written in plain language.

# THE PROCUREMENT OF GOODS, SERVICES AND FACILITIES

### **Barriers**

LAC's 2022 Accessibility Plan identified specific barriers in the procurement of goods and services:

- o No evaluation is available on the accessibility requirements that LAC's suppliers are delivering.
- o There is no way to know if bidders are providing Accessibility Conformance Reports.

 An approval process specifically addressing accessibility remains to be defined for suppliers of goods and services to LAC.

## **Solutions**

Immediate term

Develop a plan to evaluate appropriate accessibility requirements for suppliers of goods and services across LAC.

To ensure that accessibility criteria are included in requirements when appropriate, LAC has
incorporated Public Services and Procurement Canada guidelines and the Directive on the
Management of Procurement requirements into its procurement process.

# THE DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

#### **Barriers**

LAC's 2022 Accessibility Plan identified specific barriers in the design and delivery of programs and services:

- Historical materials and documentary heritage have generally been exempted from accessibility standards due to volume, variety and complexity.
- LAC has not historically had any feedback mechanisms to seek input from people with disabilities on the accessibility of programs and services, whether digital or in person.
- There have been no internal assessments of accessibility in LAC programs and services at the organizational level.
- There is no general training for service staff on how to provide services to people with disabilities.
- When service staff find accessible solutions for individual clients, these solutions are not promoted or integrated at an organizational level.

## Solutions

Immediate term

Establish active feedback mechanisms with a solution-oriented, "start with yes" approach for addressing barriers.

• The feedback mechanism is in place at all LAC's client services points.

Promote accessibility features and solutions as they are developed in response to feedback.

 Comments, questions or concerns related to accessibility of services are still forthcoming via the dedicated services feedback form. Identify or develop practical training modules for service staff.

 LAC is currently exploring options for training front-line staff on how they can better anticipate accommodation needs and provide those accommodations to clients in respectful ways.
 Several avenues are available.

## Remarks on progress

LAC continues to offer accommodations for clients who need support in accessing the collection, including through providing magnifier and screen reader software as well as electronic magnifiers and viewers capable of enlarging characters in books and microfiches.

As LAC is transitioning in 2026 to a new joint facility with the Ottawa Public Library (Ādisōke), conceived with optimum accessibility standards, it will not be making significant structural changes to its existing service point. Ādisōke has been designed to be one of the most accessible buildings in the National Capital Region, with universal accessibility and the application of stringent universal design standards.

# **TRANSPORTATION**

As it does not offer transportation services as described by the *Accessible Canada Act*, LAC did not incorporate the priority area of transportation in its first Accessibility Plan submitted in 2022.

LAC will consider the transportation priority area in its updated Accessibility Plan in 2024.

## Planning for transportation

Preliminary consultations were conducted with LAC's accessibility advisory group, Accessibility Exchange and Dialogue.

LAC sourced the new Accessibility Standards Canada standard CAN-ASC-7.1, *Accessible Travel Journey*, as a guideline.

Transportation focus areas were identified using this standard, and a series of questions were formulated to address transportation gaps.

These questions will extend to all other sectors directly involved, such as Real Property Management, Security and Circulation in Collections.

# **Consultation**

## Whom LAC consulted

Consultations in preparation for LAC's EDIA Centre of Excellence necessarily included an accessibility component and informed the development of the present Progress Report. They focused on the following:

- o Best EDIA practices and structures in other GC departments
  - Interdepartmental Network on Diversity and Employment Equity
  - Canada Border Services Agency
  - Finance Canada
  - Health Canada and Public Health Agency of Canada
  - Centre on Diversity and Inclusion, Treasury Board of Canada Secretariat
  - Canadian Heritage
  - Agents of Change for Accessible Procurement
  - Interdepartmental committee representatives and communities of practice
- Internal groups
  - Internal discussion groups on accessibility
  - LAC Partnerships and Community Engagement Division
  - LAC Human Resources and Security Branch
  - LAC's Accessibility Exchange and Dialogue advisory group and associated networks
- Accessibility Standards Canada
- Universities and learned societies in the library and archives fields
  - Director, Special Collections and University Archivist, University of Victoria
  - McGill Library
  - President, Association of Canadian Archivists
  - Canadian Association of Research Libraries
  - Western University
  - Brock University
  - University of Toronto

A review of cross-Canada disability organizations consulted to prepare LAC's Accessibility Plan will be undertaken by LAC's EDIA Centre of Excellence to target the most active organizations.

## Consultation formats, dates and questions asked

- Consultations were conducted between January 1 and December 1, 2023, via video conference, email, regular mail and telephone.
- Questions addressed best practices in other organizations, with specific questions on training, workplace accommodations, accessibility standards and data collection and analysis.

## Remarks about consultations

Links with multi-disability Canada-wide organizations—such as Independent Living Canada, Council of Canadians with Disabilities and Inclusion Canada—could be developed.

LAC's user consultations must incorporate library practices and the library and archives experiences of people living with disabilities.

LAC's user consultations can be complicated by "survey fatigue" on the part of communities consulted. Out of some 60 organizations surveyed in preparation for LAC's Accessibility Plan, only 20 responses were received.

LAC considers its feedback mechanism and feedback form related to its Accessibility Plan to provide a meaningful consultation approach.

Through its EDIA Centre of Excellence, LAC could explore soft polling and social media as forms of consultation going forward.

# **Feedback**

## Feedback received on how LAC is implementing its Accessibility Plan

One item of feedback concerned the implementation of LAC's Accessibility Plan, which mentioned, "LAC's Accessibility Plan did not name people or functions responsible for implementing actions under each Accessibility Pillar."

## Feedback received on barriers encountered by people interacting with LAC

Sixteen items of feedback concerned the accessibility experience of people interacting with LAC (employees and clients).

## Summary table: Content of feedback and locations

## Content of feedback on LAC's Accessibility Plan and accessibility experience (2023)

Workplace accommodation needs going unmet

Location: All

## Accommodations on hold as hybrid work model is implemented

Location: Place de la Cité (PDLC), 550 de la Cité Blvd., Gatineau

## Attitudinal and communications barriers

Location: All

# Accommodation for LAC clients: provide chairs without armrests

Location: Public Archives and National Library (PANL), 395 Wellington, Ottawa Accessibility and accommodations refused to contract worker (two responses)

Location: Preservation Centre Gatineau

## Information sought on accommodations (two responses)

Location: PDLC

## Seeking advice on accessibility of boardrooms at PDLC

Location: PDLC

## Accommodation for medical condition affected by poorly located single washroom

Location: PDLC

## **Guidance sought on GC Workplace Accessibility Passport**

Location: PDLC

## Concern that LAC's Accessibility Plan did not specify responsible people/functions

Location: All

# Support of Accessibility Plan and components expressed

Location: All

## Remote clients and employees (i.e., not living or working in the NCR) encounter barriers

Location: All

# Chronic inaccessibility of water fountains in LAC office building

Location: PDLC

## Long wait times and bureaucratic barriers to workplace accommodations

Location: PDLC

## Make Accessibility Passport known to LAC employees and managers

Location: All

Total: 17

# **Responses to feedback**

# Summary

Responses were made within service standards of maximum five days as stated on LAC's Accessibility Feedback Mechanism. These were met in all but three cases (due to electronic security issues; see nos. 1, 2 and 10 below).

# **Feedback statistics**

Dates between which feedback was received and acknowledged:

Instances	Date received	Date acknowledged
1	1/27/2023	2/9/2023
2	1/28/2023	2/9/2023
3	3/3/2023	3/7/2023
4	3/3/2023	3/8/2023
5	3/7/2023	3/7/2023
6	4/3/2023	Acknowledgement refused
7	4/19/2023	Acknowledgement refused
8	5/10/2023	5/10/2023
9	5/23/2023	5/23/2023
10	5/29/2023	8/24/2023
11	7/12/2023	7/12/2023
12	8/23/2023	8/25/2023
13	8/24/2023	8/25/2023
14	9/5/2023	9/6/2023
15	9/18/2023	9/21/2023
16	10/24/2023	10/25/2023
17	11/14/2023	11/14/2023

# Ways people submitted feedback

- o Fifteen messages were sent via LAC's confidential accessibility email inbox.
- o Two messages were sent using LAC's online feedback form.

# **Breakdown of feedback**

Breakdown by type of barrier:

Type of barrier	Amount of feedback
Workplace accommodations	9
Systemic	4
Workplace and client accommodations	1
Workplace accommodations (other)	1
Client accommodations (proposed)	1
Exclusion of remote workers	1
Total	17

# Breakdown by Accessible Canada Act Priority Areas:

Type of area	Amount of feedback
Employment	7
The Built Environment	2
Employment; Built Environment	1
Culture Change	1
Employment; Culture Change	1
Employment; IT; Culture Change	1
The Built Environment; Employment	1
The Built Environment; Culture Change	1
All Priority Areas	1
Employment; specifically Accessibility Passport and all	1
Priority Areas	
Total	17

Ref.: Priority areas in <u>section 5 of the Accessible Canada Act</u>

# Specific items in LAC's Accessibility Plan that received feedback

- o The GC Workplace Accessibility Passport
- o Barriers to obtaining workplace accommodations
- o Lack of workplace accommodations for contract employees
- Delayed accommodations
- o The perception that people requiring accommodations are receiving unfair advantages
- Only one washroom equipped for self-care
- o Delayed access to water fountains at one of LAC's major facilities

## Feedback gaps

- Most of the feedback (85%) concerned workplace accommodations, followed by client accommodations, workplace and client accommodations and non-inclusive events for remote users at 5% each.
- Barriers were reported under the priority areas of employment, ICT and the built environment, with culture change (LAC's additional priority area under the ACA) cited for systemic and attitudinal barriers.
- Programs and services were the object of one feedback response from internal staff seeking to serve users better.
- o No items of feedback were received under procurement and communications.

# Other observations on accessibility feedback

- o There were no comments received on the accessibility of LAC's feedback process itself.
- The following upgrades to LAC's feedback process were discussed:
  - Strengthen the process by implementing a closely controlled and sustainable procedure.
  - Contact person from LAC's EDIA Centre of Excellence to be trained in uptake and analysis of feedback.

# Additional priority area: Culture change

## **Barriers**

Consultation results for LAC's Accessibility Plan showed that disability can still be invisible and stigmatized. Not all users and employees who live with disabilities experience LAC as a safe place.

Some specific barriers in this area were identified:

- Culture change has not been discussed or planned for systematically at an organizational level in the past.
- Employees and clients do not feel safe or comfortable speaking about situations they encounter,
   and they do not expect meaningful actions and changes.
- Institutional resources are not sufficiently dedicated to culture change, inclusion and accessibility initiatives.

## Solutions

**Immediate Term** 

Establish centres of expertise to support the implementation of related action plans and culture change at LAC.

- LAC is actively in the process of establishing and staffing an Equity, Diversity, Inclusion and Accessibility (EDIA) Centre of Excellence. This EDIA Centre of Excellence is currently functioning to respond to Accessibility Plan-related issues among other priorities.
- LAC's EDIA Centre of Excellence is tasked with
  - Developing and promoting EDIA across LAC
  - Supporting LAC's growing EDIA web of activities
  - Identifying EDIA goals and actions specific to different sectors
  - Collaborating across LAC on EDIA in projects, policies, programs, initiatives and activities
  - Reporting to management on EDIA commitments, actions and feedback across LAC
  - Ensuring the application of EDIA obligations and legislative requirements in LAC's submissions to central agencies
  - Mining existing EDIA-related data across LAC, and identifying and correcting data collection gaps
  - Supporting EDIA reporting, training, championing and employee networks

# Remarks on progress

Dedicated resources and resources with lived experience of disability and knowledge of LAC's equity initiatives are being hired on assignment to advance priority areas. LAC has hired a director at the EX-01 level for its EDIA Centre of Excellence.

The work of the EDIA Centre of Excellence is currently located in LAC's User Experience and Engagement Sector.

Consultations inside and outside LAC as part of this work indicate that LAC's progress in EDIA must derive from clear knowledge of the institution's existing web of EDIA work, data and initiatives in its different sectors.

Finally, there is clear consensus that collaboration across LAC sectors is key in implementing both the EDIA Centre of Excellence and the Accessibility Plan.