



Commission du droit  
du Canada

Law Commission  
of Canada

## 2023-27 Accessibility plan for the Law Commission of Canada (LCC): Establishing the LCC with accessibility as a priority.



# Table of Contents

- Executive Summary ..... 1
- General background..... 1
- The Accessible Canada Act ..... 2
- Government of Canada context ..... 2
- Law Commission of Canada (LCC) Context..... 3
- General ..... 3
  - Feedback Mechanisms ..... 3
  - Alternate Formats ..... 4
- Accessibility Commitments ..... 5
  - Employment..... 5
  - The Built Environment ..... 5
  - The Design and Delivery of Programs and Services..... 6
  - Information and communications technology (ICT) ..... 6
  - Communications, other than ICT..... 7
  - The procurement of goods, services and facilities ..... 8
  - Transportation ..... 8
- Consultations—Methodology ..... 8
- Implementation, Monitoring and Reporting..... 8
- Glossary ..... 9

## Executive Summary

The Law Commission of Canada is an independent body that provides impartial advice to the federal government on matters related to the improvement, modernization, and reform of Canada's laws. Preceded by the Law Reform Commission of Canada (1971-), the Law Commission of Canada was established in 1997, functioned until 2006, and became operational again on June 6, 2023.

The Commission supports the Government of Canada's efforts toward a more inclusive, representative, and accessible justice system – one that respects the rights of marginalized people and protects vulnerable communities.

This document sets out the LCC's plan for reducing known barriers and preventing the introduction of new barriers over the next five-year period in seven priority action areas by identifying 7 organizational goals:

**Goal 1** – Create a culture of accessibility, where respect and inclusion are embedded in all aspects of the workplace and where all employees are empowered and supported to achieve their full potential.

**Goal 2** – Implement accessible practices to eliminate and prevent barriers to the recruitment, retention, and promotion of persons with disabilities.

**Goal 3** – Create a workplace free of physical barriers to improve the working environment for all LCC employees of various abilities.

**Goal 4** – Ensure that all employees have a safe environment to work in.

**Goal 5** – Provide accessible technology to ensure that all staff have access to the tools and platforms that they need to perform their work.

**Goal 6** – Acquire and implement technologies that ensure that all Canadians can access information and provide input or feedback to the LCC.

**Goal 7** – Ensure that LCC communications products are developed with the objective of achieving the highest level of accessibility for persons with disabilities.

## General background

The Government of Canada (GoC) aspires to have a public service that is accessible by default for the Canadian public, government institutions and their workforce. This aspiration is rooted in the belief that an inclusive public service is more innovative, efficient, and productive. The goal is to make Canada's public service barrier-free.

The government has placed significant emphasis on improving the participation of persons with disabilities in the federal public service and in the Canadian workforce. The results of the 2017 Canadian Survey on Disability suggest that 6.2 million Canadians aged 15 and

over (22% of the population) have a disability, though the actual numbers are likely higher. As a result of the physical, administrative, institutional, technological and attitudinal barriers that exist in the workplace, persons with disabilities are underrepresented in the Canadian labor force. Only 59% of Canadians with disabilities aged 25 to 64 are employed, compared to 80% of Canadians without disabilities.

The number of people living with a physical disability is expected to rise from 2.9 million to 3.6 million over the next 13 years, nearly doubling the pace of population growth overall. Removing barriers that prevent persons with disabilities from purchasing goods and services and accessing both business and government services and employment is critical to both improving their quality of life and ensuring that Canadian society benefits from their valuable participation.

## **The Accessible Canada Act**

The Government of Canada held consultations with persons with disabilities and the disability community and heard from more than 6,000 Canadians about what an accessible Canada means to them. This consultation informed the creation of the [\*Accessible Canada Act\*](#) (ACA).

The ACA takes a proactive and inclusive approach to identifying and eliminating barriers in federal jurisdiction by 2040. It includes 7 priority areas for action:

- employment
- built environment
- information and communication technologies
- communication
- procurement of goods, services and facilities
- design and delivery of programs and services
- transportation

Under the ACA, federally regulated entities must report to the public on their policies and practices in relation to the identification and removal of barriers by publishing their accessibility plans, feedback processes and progress reports.

Each department, agency and federally regulated employer is also required to develop an accessibility plan and report on progress made against this plan annually, starting in December 2022.

## **Government of Canada context**

The ACA will guide government departments, agencies, and federally regulated organizations in removing barriers to achieve full accessibility and in their reporting obligations to demonstrate progress.

A federal workforce that is reflective of the Canadian population is viewed as essential to the design and implementation of programs and services that are bias- and barrier-free and address the needs of all Canadians.

It is important to note that the federal government has introduced many initiatives over the years to increase the representation, promotion and retention of employment equity group members and to systematically reduce any barriers. Federally regulated organizations, including all federal government departments and agencies, undertake these actions consistent with the *Employment Equity Act* (EEA), which covers visible minorities, Indigenous peoples, persons with disabilities and women.

As a country, Canada is recognized globally for its support of diversity. Along with the ACA and the EEA, the Canadian Charter of Rights and Freedoms, the *Canadian Human Rights Act*, the *Pay Equity Act*, the *Canadian Multiculturalism Act*, the *Official Languages Act*, the *Privacy Act* and the *Personal Information Protection and Electronic Documents Act* (PIPEDA) are also part of the legislative framework supporting diversity and inclusion in Canada.

### **Law Commission of Canada (LCC) Context**

The [\*Law Commission of Canada Act\*](#) provides that the Commission consider the changing needs of Canadian society and of individual members of that society, through the study, review, and innovative development of Canada's law and legal systems. The LCC plays a unique leadership role in the exploration of, and engagement with, concepts in law, accessibility of law, and critical approaches to law. Key words found in the legislation that created the Commission - openness, responsiveness, innovation, efficiency, accessibility, critical debate, and cooperation - frame and support the agency's vocation. Accountable to all Canadians (formally via an annual report to Parliament), the LCC designs its program of studies with support and guidance from its Advisory Council and in consultation with the Minister of Justice.

The LCC functions as a micro-organization with fewer than 15 positions (in addition to Commissioners, an Advisory Board, fellows and research associates. All members of the organization are dedicated to the work of ensuring a just legal system that meets the changing needs of Canadian society and of individuals in that society.

The goal of LCC's accessibility plan is to eliminate, identify, remove, and prevent accessibility barriers and continue to address the accessibility needs of its employees.

### **General**

This information is provided for the purposes of providing feedback and for requesting alternate formats of the plan and/or feedback process.

### **Feedback Mechanisms**

The LCC Executive Director is designated to receive accessibility feedback and will coordinate with internal subject matter experts responsible for each of the seven priority areas to meet new obligations described under the ACA as required.

The LCC welcomes feedback from members of the public, employees and groups representing the interests of persons with disabilities on:

- The manner in which LCC is implementing its Accessibility Plan
- The barriers to accessibility encountered by LCC employees and persons interacting with the LCC
- Potential projects related to Law in Canada focused on accessibility

Feedback may be provided to the LCC Executive Director (Person designated to receive feedback):

**E-mail address:** [BMS-SGA@lcc-cdc.gc.ca](mailto:BMS-SGA@lcc-cdc.gc.ca)

**Toll free number:** *will be added once established*

**Telephone number:** *will be added once established*

**TTY line:** *will be added once established*

**Mailing address:**

Accessibility Feedback – Executive Director  
Law Commissioner of Canada  
PO Box 55052 / RPO Sparks Street  
Ottawa, Ontario K1P 1A1  
Canada

Acknowledgement of receipt will be provided in the same manner as the feedback was received unless it is requested using a different channel or format. Feedback may be provided anonymously, in which case acknowledgement of receipt will not be issued.

This plan is a living document and will be updated regularly as new developments take place and feedback is taken into consideration.

### **Alternate Formats**

The LCC will provide any information relating to its Accessibility Plan and/or feedback process in alternate formats available in print, large print, Braille, audio format (French and English) or electronic format that is compatible with adaptive technology that assists persons with disabilities upon request. Requests for documentation in Braille or audio format must be fulfilled within 45 business days of the request. All other requests must be fulfilled within 15 business days.

# Accessibility Commitments

## Employment

### **Barriers:**

- *Negative perceptions, assumptions, and behaviours toward persons with disabilities*
- *Stigma related to self-identification*

**Goal 1 – Create a culture of accessibility, where respect and inclusion are embedded in all aspects of the workplace and where all employees are empowered and supported to achieve their full potential.**

### **Supporting Actions**

- 1 Promote accessibility-related tools, resources, and events, including promoting and encouraging participation in activities for the National AccessAbility Week.
- 2 Provide accessibility-learning opportunities to employees, managers, and functional specialists.

**Goal 2 – Implement accessible practices to eliminate and prevent barriers to the recruitment, retention, and promotion of persons with disabilities.**

### **Supporting Actions**

- 1 Leverage interdepartmental accessibility groups to acquire tools and develop accessibility expertise in staffing.

## **The Built Environment**

### **Barriers**

- *any physical obstacles that make it difficult for some to easily access the workplace such as ramps, elevator controls, accessibility buttons for doors, braille indicators and emergency procedures are some features that could be missing or inadequate.*
- *any qualitative or experiential elements that make it difficult for some in the workplace such as lighting, noise levels and decor.*

**Goal 3 – Create a workplace free of physical barriers to improve the working environment for all LCC employees.**

### Supporting Actions

- 1 Identify and implement workstations for persons with mobility impairment.
- 2 Review the LCC built environment against the requirements of the most current version of the National Standard of Canada accessible design for the built environment ([CSA B65118](#)) and identify gaps.

### Goal 4 – Ensure that all employees have a safe environment to work in.

#### Supporting Actions

1. Document and review evacuation plans with employees.
2. Ensure that smoke, fire and other emergency alarms have visual as well as auditory alerts.

### The Design and Delivery of Programs and Services

The LCC does not deliver programs or services to the public. The LCC will fulfill its mandate through both internal and external communications with specific stakeholder and partner groups.

### Information and communications technology (ICT)

Central agencies and common service providers such as Shared Services Canada and Public Services and Procurement Canada set government standards for the acquisition of software and hardware for many products and services. Their leadership is essential in moving toward more accessible infrastructure.

### *Barriers*



- *Lack of knowledge and guidance regarding purchasing, installing, and learning to use assistive technology.*

**Goal 5 – Acquire accessible technology to ensure that all staff have access to the tools and platforms that they need to perform their work.**

**Supporting Actions**

- 1 Acquire technology with accessibility in mind.

**Goal 6 – Acquire and implement technologies that ensure that all Canadians can access information and provide input or feedback to the LCC.**

**Supporting Actions**

- 1 Consult the Accessibility, Accommodation and Adaptive Computer Technology (AAACT) team at Shared Services on leading-edge technology and seek training opportunities provided by AAACT.

**Communications, other than ICT**

***Barriers:***

- *Inaccessible web content due to design limitations*
- *Information that includes complex technical or legal language*

**Goal 7 – Ensure that LCC communications products are developed within an “accessibility by design” culture, where staff at all levels are aware of accessibility requirements.**

**Supporting Actions**

- 1 Utilize plain language for reports and other LCC publications, such as guidance documents and interpretation bulletins
- 2 Ensure that current employees and future hires are knowledgeable about GoC guidelines for usability and accessibility of content.

- 3 Ensure that the LCC website is compliant with the Web Content Accessibility Guide (WCAG) and aligned with the industry standard POUR principals (Perceivable, Operable, Understandable, and Robust) for web content accessibility.

## **The procurement of goods, services, and facilities**

The LCC has entered into a Memorandum of Agreement with the Department of Justice for the LCC's procurement-related activities. As the contracting authority for the LCC, Justice will ensure that procurement-related activities conducted on behalf of the LCC comply with all legal and policy requirements, including the ACA. Accessibility requirements will be part of the procurement process from the outset.

## **Transportation**

This section is not applicable to the Law Commission of Canada.

## **Consultations—Methodology**

Budget 2021 announced the revival of the LCC. In 2022-23, certain efforts were made to operationalize the LCC in anticipation of filling the position of President. The President was appointed February 2023, with official appointment to the position in June, 2023 which resulted in the substantial deferral of operational activities.

This accessibility plan aims to provide a path forward for the LCC to eliminate barriers and adapt to changing demographics and will be updated as new initiatives are introduced. It is a priority for our office to bring improvements in the work lives of LCC employees and to support accessibility of all LCC generated material for Canadians.

This plan was prepared by first completing an environmental scan to ensure understanding of central agencies' and other government departments' accessibility initiatives. The review helped identify similar goals and actions adopted as best practices for the Law Commissions first year of operations.

## **Implementation, Monitoring and Reporting**

In order to ensure that accessibility remains a constant priority within the government, the *Accessible Canada Act* dictates that regulated entities prepare and publish annual progress reports on the implementation of their accessibility plans. These progress reports must be prepared in consultation with persons with disabilities and present the feedback received (if any) and how that feedback was considered.

The LCC's first progress report will be published in December. It will include updates on the actions taken based on feedback received.

As specified in the regulations, GC organizations must publish a revised plan every three (3) years. As such, the LCC's first revised accessibility plan will be published in December 2025.

## **Glossary**

### **AAACT**

The Accessibility, Accommodation and Adaptive Computer Technology program (AAACT) is committed to making the Public Service of Canada a barrier-free, inclusive workplace, with many services. AACT is making this vision a reality by supporting departments who offer programs and services to Canadians and building accessible workplaces with equal opportunities for all employees.

### **Accessibility**

Accessibility is the combination of aspects that influence a person's ability to function within an environment. It is about giving equal access to everyone.

### **Accessible**

Accessible refers to a place that is easily reached, an environment that is easily navigated or a program or service that can be easily used or obtained. This includes certain aspects of our environment that have been adapted for use by people who identify as people with disabilities.

### **Accessible/Accessibility Technology**

Technology present in the workplace or at home that gives employees and clients the resources they need to perform to their highest potential, without internal or external barriers.

### **Accommodation**

It is the modification of a work environment and the creation of a welcoming workplace for any employee that is ill, injured or identifies as having a disability, so that they can stay at work or successfully return to work from an absence due to illness or injury, and perform job functions efficiently and safely.

### **Barrier**

A barrier can mean anything - including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice - that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.

### **Bias**

A preconceived judgment that is held by a person and that influences their perception of or their behavior towards another person or group of people.

## **Disability**

Disability means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment - or a functional limitation - whether permanent, temporary, or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society.

- **Seeing** disabilities affect vision, including total blindness, partial sight and visual distortion
- **Hearing** disabilities affect ability to hear, including being hard of hearing, deafness or acoustic distortion
- **Mobility** issues affect ability to move your body, including the required use of a wheelchair or a cane, or other issues impacting your mobility. Issues with flexibility or dexterity affects ability to move joints or perform motor tasks, especially with your hands
- **Mental health** issues affect psychology or behavior, such as anxiety, depression or social/compulsive disorder or phobia or psychiatric illness
- **Sensory/environmental** disabilities affect sensitivity to light, sounds or other distractions, as well as allergens and other environmental sensitivities
- **Cognitive** disabilities affect ability to carry out tasks involving executive functioning, such as planning and organization, learning information, communication and memory, including autism or Asperger's syndrome, attention deficit disorder, and learning disabilities
- **Intellectual** disabilities affect your ability to learn and to adapt behavior to different situations
- **Chronic health conditions or pain** affect ability to function on a regular or episodic basis due to migraines, Crohn's disease, colitis, and other disabilities or health conditions

## **Discrimination**

Discrimination means treating someone differently or unfairly because of a personal characteristic or distinction, which, whether intentional or not, has an effect that imposes disadvantages not imposed on others or that withholds or limits access that is given to others.[3](#)

## **Duty to Accommodate**

The duty to accommodate is the duty of employers to make sure that their workplaces are inclusive and allow all workers to participate fully. This duty relates to the grounds of discrimination in human rights laws.

### **Gender Identity**

Gender Identity is each person's internal and individual experience of gender. It is their sense of being a woman, a man, both, neither, or anywhere along the gender spectrum. A person's gender identity may be the same as or different from the gender typically associated with their sex assigned at birth. For some persons, their gender identity is different from the gender typically associated with their sex assigned at birth; this is often described as *transgender* or simply *trans*. Gender identity is fundamentally different from a person's sexual orientation.

### **Inclusion**

Inclusion is the act of recognizing, valuing and building on differences in identity, abilities, backgrounds, cultures, skills, experiences and perspectives while respecting human rights.

### **Jargon**

Special words or expressions that are used by a particular profession or group and are difficult for others to understand.

### **Nothing Without Us**

Nothing Without Us is an accessibility strategy used for the Public Service of Canada to communicate the message that persons with disabilities will be involved in the developmental and implementation of new policies concerning accessibility.

### **Official language minority communities**

Official language minority communities are groups of people whose maternal or chosen official language is not the majority language in their province or territory – in other words, Anglophones in Quebec and Francophones outside of Quebec. For the purposes of its granting programs, the Canada Council defines OLMC individuals, groups and arts organizations as those who self-identify as belonging to one of these groups.

### **Plain Language**

Writing that is easily understandable on first reading. This does not include over-simplifying or leaving out critical information. Plain language actually makes critical information accessible for everyone.

### **Procurement**

The action of acquiring goods and services by departments and agencies to ensure that workspaces are accessible and usable by everyone, including persons with disabilities.

This ensures that the goods and services the government buys are accessible and usable by everyone, including persons with disabilities.

**Racialized group**

A group of people categorized according to ethnic or racial characteristics and subjected to discrimination on that basis.

Ethnic characteristics include culture, language and religion. Racial characteristics include skin colour, hair texture and facial features.

**Sexual Orientation**

A person's physical, romantic and/or emotional attraction to, and/or intimate relations with, individuals of a different gender, the same gender, no gender, or more than one gender. A person's understanding of their sexual orientation may change.

**Systemic barrier**

Systemic barriers are policies or practices that result in some individuals from underrepresented groups receiving unequal access to or being excluded from participation in employment, services or programs. These barriers are systemic in nature, meaning they result from institutional-level practices, policies, traditions and/or values that may be "unintended" or "unseen" to those who do not experience them, but that have serious and long-lasting impacts on the lives of those affected (e.g. on their career trajectories and/or mental and physical health).

**Visible Minority**

Visible minority is defined for federal employment equity purposes. Visible minority refers to whether a person is a visible minority or not, as defined by the *Employment Equity Act*. Persons, other than Indigenous peoples, who are non-Caucasian in race or non-white in color.