

# **Advancing accessibility**

**The Accessibility Commissioner  
of Canada's 2024-2025 Report  
to the Minister of Jobs and Families**



Canadian  
human rights  
commission

Commission  
canadienne des  
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**Canadian Human Rights Commission**

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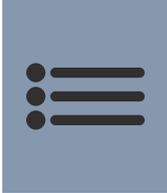
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# Commissioner's message

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It is my pleasure to present to you the third Annual Report of the Office of the Accessibility Commissioner, covering the period from April 2024 to March 2025.

This year marked a significant milestone on our journey to building a barrier-free Canada. For the first time, all federally regulated and government organizations were required to publish either an accessibility plan or a progress report. This provided our Office with more insight and understanding than ever before. We now have a much clearer picture of both the growing awareness of accessibility obligations and the progress being made to remove barriers and, equally important, the work that still lies ahead.

These foundational planning and reporting requirements are critical to realizing the goals of the Accessible Canada Act, and they represent a tangible step forward in embedding accessibility into the way we work, govern, and serve.

Throughout the past year, our inspections, compliance promotion, and outreach efforts have enabled us to identify priorities and develop meaningful resources to support regulated organizations. These tools are helping organizations understand their responsibilities and take action to foster greater inclusion.

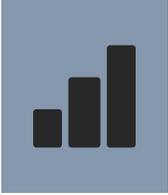
Accessibility is not simply an initiative, it is a human right grounded in equity, dignity, and full participation. For many, especially those at the crossroads of multiple intersectional identities, accessibility remains a persistent challenge. Our mandate is to monitor, support, and encourage the removal of barriers so that all people can participate fully in society. This is how we move towards equity. This is how we begin to level the playing field.

I want to acknowledge and congratulate the dedicated team at the Office of the Accessibility Commissioner, whose hard work over the past five years has built a strong and thoughtful foundation on which we can continue to grow. Because of their efforts, this office is well positioned to deepen its impact and deliver on the promise of the Accessible Canada Act.

Achieving accessibility will take all of us—government, business, civil society, and individuals—working in partnership. It is only through our shared commitment and collective action that we can realize a Canada that is inclusive and equitable for everyone.

I am deeply honoured to have been appointed as Canada's Accessibility Commissioner for the next seven years. I look forward to advancing this vital work and supporting progress towards a barrier-free Canada by 2040.

**Christopher T. Sutton**  
Accessibility Commissioner



# Accessibility by the numbers



Over the course of 2024-2025, the Office of the Accessibility Commissioner:

completed  
**426** inspections

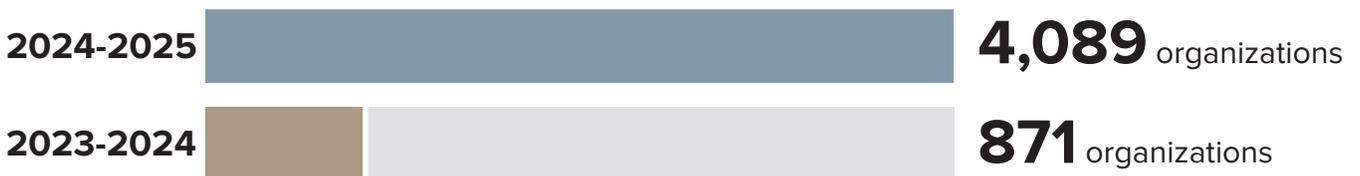
received  
**3** complaints

resolved  
**4** complaints

## Total number of inquiries



## Total number of organizations that had to publish plans



## Total number of organizations that had to publish reports





# Monitoring Compliance

## Establishing a baseline understanding of compliance readiness

For the first time since the Accessible Canada Act came into force, all federally regulated organizations were required to notify the Accessibility Commissioner of the publication of their accessibility plan or progress report. Over 4,000 organizations had to publish their first accessibility plans and over 1,000 organizations were required to publish their first or second progress reports. This data is a key indicator of an organization's compliance awareness and readiness.

Between April 1, 2024, and March 31, 2025, the Office of the Accessibility Commissioner (herein referred to as "the Office") deployed its inspection resources with the objective of determining the level of awareness amongst organizations of their compliance responsibilities. During this period, inspection activities targeted large private organizations that were non-compliant with the publishing deadlines established by the Act and its Regulations. These efforts also helped the Office to understand how prepared these organizations were to comply with their accessibility obligations. The findings were as follows:

- **Government organizations:** Higher level of awareness and compliance;
- **Large private organizations (100+ employees):** Lower to moderate level of awareness and compliance; and
- **Small private organizations (10-99 employees):** Very low level of awareness and compliance.

Given that small private organizations make up approximately 77.5% of the federally regulated organizations, in comparison to 6.7% for government organizations and 15.8% for large private organizations, improving the low awareness and compliance rate amongst small private organizations will continue to be a priority. At the same time, government organizations and large private sector organizations provide proportionally more services to people with disabilities. The Office will prioritize inspection and compliance promotion activities with a risk-based and data-informed approach that is focused on delivering the best outcomes for people with disabilities.



# Inspections

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The Office's inspection activities can encompass multiple regulatory requirements, verifying different compliance elements simultaneously. To facilitate reporting, these inspections are typically grouped into broader inspection activities: publication and notification inspections, and content inspections.

## Publication and notification inspections

This type of inspection assesses whether organizations have published required planning and reporting documents by the deadlines established in the Regulations, and whether the Accessibility Commissioner was notified when documents were published.

The Office's 416 publication and notification inspections included:

- 382 inspections of large private organizations, assessing compliance with accessibility plans, feedback process descriptions, and progress report 1 deadlines;
- 8 inspections of government organizations, assessing compliance with the progress report 1 deadline; and
- 26 inspections of government organizations, assessing compliance with the progress report 2 deadline.

Inspection results revealed that most government organizations met their compliance obligations, with the compliance rates declining for the large private organizations.

## Content inspections

While the focus this past year was on notification and publication inspections as outlined above, a small sample of more detailed inspections was also conducted. These inspections assessed whether organizations included the required regulatory elements in their published planning and reporting documents.

The Office conducted 10 content inspection activities of government organizations, including:

- 5 inspections assessing the content of accessibility plans and feedback process descriptions; and
- 5 inspections assessing the content of progress report 1.

Although the number of current content inspections was limited, the results were consistent with those of in previous years. These inspections revealed recurring areas of non-compliance amongst government organizations for progress reports, accessibility plans, and feedback process descriptions.

## Inspections of Accessibility Plans

While all accessibility plans included proposed action steps, many plans lacked clear identification of existing barriers in their policies, programs, and services. There were also notable inconsistencies in the use of required Accessible Canada Act section 5 headings, with some organizations using incorrect or inconsistent terms. In several cases, plans did not include required contact information under the general heading.

## Inspections of Feedback Process Descriptions

This area saw the highest overall number of non-compliances. A significant portion of organizations failed to confirm that feedback would be acknowledged—except when submitted anonymously—and in the same manner it was received. Others did not identify the designated contact person or provide clear information on how feedback could be submitted.

## Inspections of Progress Reports

The most common issue identified in progress report inspections was inadequate reporting on efforts to remove barriers. Other frequent gaps included the failure to structure reports under the required Accessible Canada Act section 5 headings, including the absence of headings, and omission of information on how contact details could be used.



# Systemic and emerging accessibility observations

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Given the staggered implementation of the Act and the fact that for some organizations it was the first year in which they had to comply with any accessibility obligations, it is too early for the Office to identify systemic issues or trends. The Office will continue to conduct inspections activities and analyze new data as it becomes available, paying close attention to trends that might indicate possible systemic or emerging accessibility issues.

In response to a high volume of inquiries in 2023 and 2024 regarding notifications—and a noticeable absence of notifications from many federally regulated large private organizations (100 or more employees)—the Office prioritized notification and publication inspections for this group focusing solely on the publication and notification of accessibility plans, progress reports and feedback processes. The objective was to maximize proactive compliance efforts of as many organizations as possible and to ensure foundational obligations were understood and being met.

During these inspections, the Office frequently observed that these documents were difficult to locate on organizational websites. This lack of visibility can significantly hinder persons with disabilities from accessing and reviewing critical information, undermining the purpose of the Accessible Canada Act. Ensuring these documents are clearly posted and easy to find is essential to supporting transparency, accountability, and accessibility.



# Complaints

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The Accessible Canada Act allows any individual who has suffered harm that was caused by an organization's contravention of the Accessible Canada Regulations to file a complaint with the Accessibility Commissioner. In some cases, the Accessibility Commissioner will determine that a complaint must be referred to another authority for adjudication.

The Accessibility Commissioner can only receive complaints related to the current Regulations, which only govern an organization's accessibility plan, feedback process or progress report. As additional priority areas are regulated, the potential for the Accessibility Commissioner to receive complaints increases substantially.

This year, a total of three complaints were filed with the Accessibility Commissioner. In each of these cases, the Accessibility Commissioner determined that the complaints fell outside the Commissioner's mandate, and all three complaints were resolved by being referred to the appropriate authority.

A single case from 2023–2024 carried over and was resolved by July 2024, bringing the total number of resolved complaints this year to four. The Accessibility Commissioner determined that the complaint fell outside of his mandate, and the alleged harm occurred before the Regulations came into force and therefore could not be addressed under the current legal framework.

In the last year, the Office continued to develop tools to assist complainants and respondents to navigate the complaints process. These include:

- complaint, response, and reply forms, along with instructions, to help parties submit information; and
- general information to respond to frequently asked questions about complaints and inquiries related to the Act.

Further work is currently underway to strengthen the complaints process, including the development of:

- an Alternate Dispute Resolution framework;
- complaints rules of procedure; and
- practice directions (supplemental guidance to provide clarity on procedural matters).

The development of these tools and processes are part of our ongoing efforts to promote fairness and efficiency while processing accessibility-related complaints, giving people with disabilities the opportunity to file complaints where required, if and when they face barriers in their daily lives.



## Enforcement actions

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To date, the Office has not undertaken any enforcement actions, as efforts to guide organizations towards compliance through the inspection process and the use of tools such as corrective action plans has been consistently successful.

Despite this success, if voluntary compliance cannot be achieved, the Accessibility Commissioner is prepared to use the enforcement tools that the Act authorizes.

During the past year, the Office developed several templates for these enforcement tools, such as Notices of Violation and Compliance Orders, as well as guidance to help organizations understand their rights and obligations when they receive are on the receiving end of an enforcement action.

Additionally, the Office has developed enforcement tools and guidance related to the issuance of Administrative Monetary Penalties to organizations that contravene their regulatory obligations under the Act or its Regulations. The ability to issue Administrative Monetary Penalties is an important element of the Accessibility Commissioner's compliance and enforcement program and they will be used as intended by the Act- to promote compliance but not to punish organizations.



# Promoting compliance

## Strengthening partnerships and engaging with the public

In 2024, the Office participated in a number of engagement events at the international, national and local level. A few events include:

- The Canadian Autism Leadership Summit in Ottawa in April 2024, where the guests included autistic people, community leaders, provincial and territorial representatives, and academics from across the country. The discourse at this event centred around diversity of perspectives, current priorities and ongoing challenges.
- The National Aviation Accessibility Summit in Ottawa in May 2024, hosted by the Canadian Transportation Agency. This Summit brought together people with disabilities and disability organizations, industry representatives and government officials to discuss areas for improvement in air transportation.
- The Accessible Canada, Accessible World Conference in Montreal in May 2024.
- The 17<sup>th</sup> Session of the Conference of States Parties to the Convention on the Rights of Persons with Disabilities in June 2024, at the United Nations Headquarters in New York.

Also in 2024, the Office continued to work with key federal accessibility partners, participating in regular information-sharing, coordination or collaboration. Those engagements were with:

- Accessible Canada Directorate, Employment and Social Development Canada
- Chief Accessibility Officer and her Office
- Accessibility Standards Canada
- Canadian Radio-television and Telecommunications Commission
- Canadian Transportation Agency
- Canadian Human Rights Commission
- Canadian Human Rights Tribunal
- Office of Public Service Accessibility
- Federal Public Sector Labour Relations and Employment Board

Representatives from the Office also engaged with counterparts from different levels of government, organizations under federal jurisdiction, and stakeholders. These engagement activities and events were used to promote compliance with the Act, share useful resources, exchange promising practices or discuss accessibility-related topics of interest to the Act and a barrier-free Canada.

## **Communicating effectively with federally regulated organizations**

In the last year, the Office developed a comprehensive database to assist in compliance monitoring and compliance promotion activities. The database houses information about organizations governed by the Act, including size of organization, industry and key personnel. The database is being used to:

- proactively identify individual sectors for compliance monitoring and promotion;
- inform the development of communications, engagement, and outreach materials; and
- test assumption and trends in the context of compliance monitoring or compliance promotion plans.

This database will also be used to target communications and compliance letters to regulated organizations.

## Development of guidance

Over the past two years, a key priority has been the development and promotion of guidance materials and resources to support organizations in fulfilling their obligations. Some compliance promotion tools that have been developed to date include:

- Guidance materials
  - [Accessible Canada Act - Notification requirements for organizations that are subject to two regulations](#)
  - [Simple, clear and concise language](#)
  - [Where to publish: accessibility plans, feedback process descriptions and progress reports](#)
  - [Instructions and template for accessibility plan](#)
  - [Instructions and template for feedback process description](#)
  - [Instruction for completing the template for a progress report](#)
  - [Template for a progress report](#)
  - [Accessibility plans – Voluntary self-assessment tools](#)
  - [Feedback processes – Voluntary self-assessment tools](#)
  - [Guidance on shared planning and reporting documents](#)
  - [Guidance on Transportation Requirements under the Accessible Canada Regulations](#)
- Videos
  - [How to Prepare your accessibility plan and feedback process](#)
  - [Best practices for meaningfully consulting people with disabilities](#)

This year, the Office offered presentations to help regulated organizations better understand the Act and their obligations. These presentations have been a well-received addition to existing compliance promotion tools and practices.

Over the last year, the Office has been in contact with approximately 5,000 organizations to remind them of upcoming deadlines that they were subject to.



# Development of Information and Communications Technologies requirements

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The Accessible Canada Act creates a framework for federal accessibility partners to work together. The Accessible Canada Directorate at Employment and Social Development Canada and Accessibility Standards Canada are two of the federal accessibility partners who work together with the Office towards a goal of a barrier-free Canada by 2040.

On December 21, 2024, ESDC's Accessible Canada Directorate [proposed amendments to the Accessible Canada Regulations](#), which would introduce new obligations for one of the seven areas identified in the Act. The proposed amendments are titled "Information and Communications Technologies (ICT)." These new obligations would set accessibility requirements for three areas of Information and Communications Technologies: web pages (including web applications), mobile applications and non-web documents.

In May 2024, Accessibility Standards Canada [adopted new accessibility requirements for ICT products and services](#). Although these new standards are voluntary, they were incorporated into the proposed regulatory amendments.

The Office informed organizations, on behalf of Employment and Social Development Canada, providing information on the proposed amendments. The Office continues to work closely with the Accessible Canada Directorate at Employment and Social Development Canada, the Chief Accessibility Officer and Accessible Standards Canada to ensure it is ready to promote, monitor and enforce the new regulatory requirements once they are in force.

The incorporation of these new regulations will require organizations to look more comprehensively at all aspects of their information and communications technology to ensure that barriers are prevented, removed or mitigated, leading to an accessible experience for all users.



# About the Accessible Canada Act

The Accessible Canada Act is a federal law that aims to identify, remove and prevent barriers faced by people with disabilities. The Act came into force in 2019, with the goal of creating a barrier-free Canada by 2040.

Under the Act, the Accessibility Commissioner is responsible for promoting, monitoring and enforcing the Act and the Accessible Canada Regulations.

The Act applies to the federal government and to organizations that are regulated by the federal government. Private businesses such as banks, transportation and telecommunications companies are also subject to the Act since they are governed by federal regulations.

The Act prescribes a proactive approach to accessibility – instead of waiting for people with disabilities to ask for barriers to be removed, organizations must identify, remove and prevent barriers. The Act focuses on [barriers](#) in seven priority areas.

When creating their accessibility plans, organizations must:

- consult people with disabilities;
- publish accessibility plans detailing how they are finding, removing and preventing barriers;
- set up ways to receive and respond to feedback about accessibility; and
- publish progress reports about how they are following their accessibility plans.

Organizations must also notify the accessibility Commissioner when they publish their plans, feedback processes and progress reports.

## The role of the Office of the Accessibility Commissioner

The Office is responsible for promoting compliance by verifying if organizations are fulfilling their responsibilities set out in the Act and the Regulations, and if not, to take appropriate enforcement actions.

The Office also deals with complaints. In the event that a federally regulated entity does not comply with the Regulations, an individual may file a complaint with the Accessibility Commissioner if they have suffered physical or psychological harm, property damage or economic loss because of the organization's non-compliance. The Accessibility Commissioner will then determine if this falls under his authority, and if so, will take a decision accordingly.