Canadian Human Rights Commission Accessibility Plan Progress Report

December 2024

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Executive summary

The Canadian Human Rights Commission is pleased to present its annual Accessibility Plan Progress report.

As a federally regulated organization, we have prepared this progress report as part of the Commission's obligations under the <u>Accessible Canada Act</u> (ACA) and the <u>Accessible Canada Regulations</u> (ACR). This progress report provides updates on the progress the Commission has made in implementing our 2023–2025 Accessibility Plan.

In the year since our last progress report, we have been driven in our work to create an inclusive and barrier-free organization for everyone who works for or who is served by the Commission. We have been carrying out this work in close collaboration with people with disabilities, stakeholders, and employees with lived experience. It is for that reason that we begin this progress report with the most important part of our progress: inviting ongoing feedback and sharing what we have learned from our most recent consultations.

It is vital that people in Canada can look to our organization as a leader in accessibility and inclusion for all.

As an employer, we are determined that our workplace be one where every employee can participate, belong and thrive. As a service provider, we are focussed on creating a barrier-free path for people looking to access human rights justice.

As you will read in this progress report, over the course of 2024, we have made strides and hit new milestones — from our physical environment, to our public website, to our complaints process, our mediation services and our hiring practices. Here are some highlights:

- In our employment practices, we have continued to find new ways to hire more
 employees with disabilities and to support these employees to be successful in the
 workplace. We achieve this by improving upon hiring processes so that they are more
 equitable and open to everyone. We support these employees through a formal
 sponsorship and mentorship programs.
- In our **built environments**, in offices in Montreal, Toronto and Ottawa, we have made physical improvements, including accessible widening our hallways, installing more automatic doors, making our washrooms more accessible, and ensuring accessible technology tools are available to staff.
- We have made several learning sessions available to staff throughout the year on a
 variety of topics related to accessibility, with the goal of this ongoing training always
 being to increase awareness and sensitivity to accessibility considerations.

- We have overhauled our information and communication technologies starting with a comprehensive revamp of the Commission's public website, informed by user feedback.
 Our new website offers individual users with a more barrier-free and swifter path to the human rights information they need.
- We have also continued to develop products in accessible and plain language formats
 to allow that a diversity of rights holders could engage with Commission content and
 materials. Over the past year, we have also produced new ASL and LSQ videos on key
 documents.
- We strengthened our contracting directive so that accessibility is considered in the provision of goods and services.
- We are continuing to improve the way we collect **disaggregated data** from people accessing our complaints systems.
- And together with the support of the Federal Housing Advocate, we have created a framework to track Canada's implementation of the right to adequate housing for people with disabilities.

In 2023, the Commission appointed a Director of Inclusion, Diversity, Equity, Accessibility and Anti-Racism (IDEA-AR responsible for leading the Commission-wide implementation and evolution of our Anti-Racism Action Plan and our Accessibility Plan.

Together, the Commission is approaching our collective efforts to improve accessibility within our organization with a deep understanding that people with disabilities are not a homogenous group. Rather, each person brings their own set of unique experiences, needs and perspectives. Therefore, all aspects of how we operate — from procuring services, to program design, to our physical environment and online platforms — must all be approached with this understanding of the distinct and unique needs of the people we serve.

With the highlights featured in this progress update, this work is ongoing and ever evolving. As technology and research expand, there will always be new levels of accessibility progress to pursue.

Through it all, we will remain steadfast in our commitment to be better accessibility leaders, and to remain in close conversation with people with disabilities about what exactly they need from their Canadian Human Rights Commission, and how we can keep improving.

General

We want to hear from you about our progress. The Commission recognizes the vital role that people with disabilities, our employees, people who use our services, and other interested members of the public play in helping us to identify, remove and prevent barriers.

So before we take you through our various milestones and progress, we want to first talk about how important your feedback is to us, and how you can get us your input.

How to provide feedback

The Accessible Canada Act requires all federally regulated organizations, including the Commission, to publish annual progress reports for the next two years and to develop a new plan in three years. Your invaluable feedback will inform both our subsequent progress reports and our next iteration of our Accessibility Plan. The Commission has designated the Director of Inclusion, Diversity, Equity, Accessibility and Anti-Racism (IDEA-AR), to receive your feedback on behalf of the Commission.

We invite your comments, ideas and feedback on:

- our 2023–2025 Accessibility Plan
- how we are putting the plan in place
- any barriers that you may encounter (e.g. when interacting with us, or when accessing our programs and services)
- our feedback process

You can provide feedback in the following ways, and you may choose to include your name and contact information:

- Send an email to <u>info.com@chrc-ccdp.gc.ca</u>
- Call by telephone at 1-888-214-1090 or by TTY at 1-888-643-3304
- Use Video Relay Service at <u>Canada VRS</u>
- Mail us at: 344 Slater Street, Ottawa, ON, K1A 0N7

We will confirm that we have received your feedback.

How to provide your feedback in alternate formats

You can ask us for our progress report, or information about our feedback process, in the following alternate formats: print; large print; Braille; audio; or an electronic format that is compatible with adaptive technology that is intended to assist persons with disabilities.

We will provide the format you ask for as soon as possible. Braille and audio formats may take up to 45 days. Print, large print and electronic formats may take up to 15 days.

How to contact us for alternative formats

- Send an email to info.com@chrc-ccdp.gc.ca
- Call by telephone at <u>1-888-214-1090</u> or by TTY at 1-888-643-3304
- Use Video Relay Service at Canada VRS
- Mail us at: 344 Slater Street, Ottawa, ON, K1A 1E1

Feedback

In 2024, the Commission received limited feedback through its feedback process. Going forward, we will be looking at ways to encourage more input on our accessibility plan, and overall accessibility at the Commission.

Consultations

The Accessible Canada Act requires the Commission to consult people with disabilities in preparing its progress report.

The Commission has long advocated for the fundamental principle of "Nothing Without Us." We recognize the vital role that people with disabilities, our employees, and people who use our services play in helping us to identify, remove and prevent barriers. As part of our 2023–2025 Accessibility Plan, the Commission created a feedback process where individuals can share their comments and ideas. The Commission regularly engages with the disability community and stakeholders on its work and receives feedback through this direct engagement.

How we consulted

In preparation for this progress report, the Commission carried out consultations with people with disabilities and other equity-deserving groups in two stages. First, we completed an external consultation to provide external insights on the Commission's progress implementing our Accessibility Plan. In September 2024, we invited people to submit their feedback through an online questionnaire.

We asked participants:

- if they interacted with the Commission within the past year
- how they interacted with us and if they experienced barriers
- what specific barriers did they encounter and in what area of the Commission
- what suggestions they had on how the Commission can improve

Second, we consulted Commission employees. We spoke with employees with diverse and intersecting identities, some of whom belong to other equity-deserving groups. In September 2024, we invited all employees to virtual group discussions where we emphasized the importance of hearing perspectives from employees with lived experience. Employees who were unable to attend were able to submit written comments. Discussions were also held with Commission Executives.

In our consultations, we asked employee participants for feedback based on the different areas of our accessibility plan:

- what are we doing well?
- what are the barriers?
- how can we improve accessibility?

The Commission also invited written comments from our unions and our internal Decolonization and Anti-Racism Consultation Committee.

Accessible consultation

The Commission designed all consultations to be inclusive and accessible. We began by inviting participants to let us know about their accommodation needs. We then worked to find the best solutions. For example, we used Microsoft Forms for our external consultations. We designed and tested the form with accessibility top of mind. We also invited participants to contact us for alternate ways to provide feedback.

When consulting with employees, we used Microsoft Teams, which offers captioning services, and we hosted the discussions in both official languages. We shared accessible presentation documents in advance to help participants prepare for the discussion. We also invited additional feedback by email.

Who we consulted

Through an emailed questionnaire, we invited several individuals and organizations to participate in our external consultations. Together, they represent a cross-sectional lens of disability and advocacy groups for equality, diversity and inclusion. We also invited feedback from other organizations belonging to our Network for Advancing Racial Equality, which in total includes close to 200 stakeholders. We did not require participants to identify themselves when responding. The stakeholders we invited to provide feedback include:

- Accessibility for All
- Alliance for Equality of Blind Canadians
- Arch Disability Law Centre
- ASE Community Foundation for Black Canadians with Disabilities
- Autism Alliance of Canada

- Barrier-Free Canada
- The British Columbia Aboriginal Network on Disability Society (BCANDS)
- Canadian Alliance on Race and Disability (CARD)
- Canadian Association of the Deaf
- Canadian Autism Spectrum Disorders Alliance (CASDA)
- Canadian Centre for Diversity and Inclusion
- Canadian Council of the Blind
- Canadian Council on Rehabilitation and Work
- Canadian Hard of Hearing Association
- Canadian Hearing Society (CHS)
- Canadian Mental Health Association (National)
- Canadian National Institute for the Blind (CNIB)
- Canadian National Society of the Deaf-Blind, Inc.
- Communication Disabilities Access Canada
- Council of Canadians with Disabilities
- Disability Rights Promotion International (North America)
- DisAbled Women's Network of Canada (Dawn Canada)
- Eviance
- Guide Dog Users of Canada
- Inclusion Canada
- Inclusive Design Research Centre (IDRC)
- National Coalition of People who use Guide and Service Dogs in Canada
- National Education Association of Disabled Students (NEADS)
- People First of Canada
- Realize Canada
- Rick Hansen Foundation
- Spinal Cord Injury of Canada

For our internal consultations, we sought feedback from employees with disabilities, Commission executives, and members of our internal Decolonization and Anti-Racism Consultation Committee and our unions.

What we learned

During our consultations, participants told us about the importance of:

1. Taking a built-in approach to accessibility

- Designing our work in an accessible way from the outset (i.e., when creating documents, when engaging with stakeholders, when acquiring, designing, testing and evaluating goods and services, etc.)
- Recognizing that accessibility is not one-size-fits-all
- Finding ways to support, welcome and include all people
- Strengthening accountability around accessibility to reduce redundancies and increase collaboration
- Streamlining our policies, practices and procedures to make them easy to understand and use
- Ensuring people with disabilities are supported and sponsored in their career development and exploring targeted recruitment

2. Building capacity around accessibility

- Receiving adequate funding to allow us to prioritize, manage workloads and effectively execute accessibility improvements
- Continuing to provide training, tools and resources to help teams understand how to do their work in an accessible way
- Acquiring or building internal expertise around accessibility, including subject matter specialists, and involving people with disabilities in project design
- Sharing knowledge with employees on how to make documents accessible and easy to use, including use of plain language and use of accessibility features in existing tools
- Increasing awareness around non-visible disabilities, and a deeper understanding of a trauma-informed approach
- Enhancing workplace supports for employees with disabilities, such as creating employee resource groups or networks

3. Offering people the tools they need

- Ensuring that communications, platforms, tools and systems are accessible (for example, some internal applications introduced by the Government of Canada are not accessible)
- Exploring digital solutions such as use of artificial intelligence (AI) (e.g., AI-generated CART services)
- Improving accessibility of our intranet site
- Ensuring forms and other products for the public are accessible

4. Making the return to the office and our hybrid work environment more accessible for all

- Maintaining health and safety of the workplace, including air quality, lighting and customizable ergonomic equipment (e.g., chairs, desks, footrests)
- Addressing barriers presented by the return to the office for all employees, including employees with mental health and accessibility concerns
- Finding solutions to promote inclusion in a hybrid environment (i.e., a more equitable approach to ensure engagement for employees teleworking or in remote locations)
- Finding solutions for employees bringing equipment and belongings to the office (e.g., carrying equipment back and forth can present barriers, especially during winter months)
- Finding solutions to meet a variety of needs (e.g., light and noise sensitivity; need for assigned offices instead of rotating workspaces)
- Continuing to improve the physical work environment (e.g., wayfinding signage, emergency systems, maximizing use of quiet rooms)

5. Approaching accommodation with sensitivity and flexibility

- Offering multiple ways to communicate information
- Ensuring individuals don't need to keep reminding us of their accommodation needs throughout our complaints process
- Making sure telework is recognized as an accommodation
- Recognizing that solutions are not one-size-fits-all and may change over time
- Reducing stigma around asking for an accommodation

We are carefully considering all the comments we received and how best to address them. This feedback will also be used to inform our forthcoming updated Accessibility Plan.

Our progress under section 5 of the Accessible Canada Act

This section details the progress we have made over the past year on the key areas identified in section 5, the Purpose of the Accessible Canada Act. We have organized this section in accordance with the template provided to all federally regulated organizations.

Employment

Barriers we identified:

- Additional training on accommodation processes and practices would be helpful to managers and employees.
- Recent changes to the <u>Public Service Employment Act</u> that are meant to further reduce barriers and strengthen diversity and inclusion, including for people with disabilities, have not yet been included in the Commission's hiring processes and practices. (e.g., hiring managers proactively informing candidates that they can submit exams in an alternate format.)

Goal we set: Ensuring Commission staffing advisors value the innate abilities of candidates with disabilities, as well as the lived experience and perspectives they would bring to the job.

- According to the most recent data from Treasury Board Secretariat, the Commission has
 the second highest percentage of persons with disabilities of any federal government
 department or agency.
- We are finding new ways to continue hiring more employees with disabilities.
 Commission staffing advisors are helping managers hire more people with disabilities by leveraging specific job pools, such as the <u>Careers for Persons with Disabilities program</u>, the Virtual Door to Talent with Disabilities and Employment Opportunity for Students with Disabilities.
- We are ensuring that our hiring process is fair and open to everyone. Our goal is to make the process accessible from the start. Here are some of the steps we've taken:
 - Our job advertisements now include the human resources advisor's contact details at the top, so candidates can easily ask for accommodations. (i.e., If candidates have trouble with the "Apply online" option, they can contact us directly for help.)
 - We give candidates clear details about the hiring process, such as how many questions they'll answer and how long the interview will take.
 - We send interview questions at least 24 hours before the interview.
 - For take-home exams, candidates get at least 24 hours to complete and return their answers.

• We have reviewed and improved our email and document templates to make them accessible.

Goal we set: Ensuring that every employee has an opportunity for growth and career advancement.

Progress update:

- We've taken part in every round of the Treasury Board's Mosaic Program. This program
 gives employees from equity-deserving groups, including people with disabilities, a
 chance to work in executive roles to help them grow. The program is very competitive,
 with only 50 people chosen from across the government each time. We have successful
 candidates from the second and third cohorts.
- The Commission's IDEA-AR Division (Inclusion, Diversity, Equity, Accessibility and Anti-Racism) has started a Mentorship and Sponsorship Program to help employees from equity-deserving groups grow in their careers. Matches were made in September 2024, and the program will run for 18 months, with ongoing support and feedback collection.

Goal we set: Our employees will receive the training and tools they need to help achieve our accessibility goals for employment.

- In preparation for the hybrid return to work, we made sure our workplaces are
 accessible by design. This included accessible physical spaces (e.g., widened hallways,
 automatic doors, accessible washrooms, ergonomic desks and chairs), accessible
 technology tools (e.g., Microsoft 365 with built-in accessibility features), and accessible
 documents available on our intranet. Employees with disabilities helped us make these
 decisions.
- While we've reduced the need for individual accommodations, the Commission's
 Guidelines on the Duty to Accommodate are still there to support individual needs. We
 have reviewed and published the guidelines, and shared them with all staff. These
 guidelines explain how to request accommodations, ensuring everyone is treated fairly.
- We created a confidential Workplace Wellness mailbox, managed by human resources, for employees to request accommodations and for managers to get guidance on how to handle these requests.
- This past year, we launched the Commission's Guidelines on Mandatory Learning and Training. The Guidelines contain a matrix that coordinates all required training for staff, including courses on making documents accessible, adopting an inclusive mindset, and addressing disability inclusion. Managers must also complete a course on Disability Management and Workplace Wellness.

- We have made various learning sessions available to staff throughout the year, including:
 - LifeSpeak event on Overcoming Unconscious Bias (June 2023)
 - Public Services and Procurement Canada event for International Day of Sign Languages (September 2023)
 - Public service event for International Day of Persons with Disabilities (December 2023)
 - GC Workplace Accessibility Passport Info Session (February 2024)
 - Inclusion at Work Disability awareness training (May 2024)
 - o Public service event for National Accessibility Week (May 2024)
 - Multiple Chemical Sensitivity Training (June 2024)
 - Workplace Wellness events, including presentations on Employee Assistance Services (EAS), Informal Conflict Management Services (ICMS), and a session from the Shared Ombuds Services about contributing to a culture of care at work (October 2024)
- Commission human resources staff are expected to attend central agency accessibility
 and accommodation learning and development activities, know about Commission's
 publications like the <u>Workplace Accommodation Guide</u>, and participate in community
 practice groups related to accessibility and employee accommodation.

Built environment

Barriers we identified:

- The need for more signs and better colour contrasting signage at our building's entrance, parking and exterior
- Lack of assistive listening technology in reception areas, lounges and meeting rooms
- Inaccessible signage (too small; difficult to read; insufficient and inconsistent use of raised characters, Braille and tactile markings; insufficient colour contrast)
- Inconsistent mounting heights and locations and missing signage to identify rooms and closets
- Limited wayfinding signage and strategies, including no electronic wayfinding

Goal we set: Ensuring our workplaces are accessible and inclusive for all those who use them.

- As a tenant, the Commission has a service agreement with Public Service and Procurement Canada. Several additional improvements in our Ottawa tenant space have been completed:
 - We established a new multi-purpose room to be used as a quiet room, lactation room, and prayer room

- We updated the men's washrooms to make them more accessible for seated users and people of shorter stature
- We installed grab bars at each of the urinals
- We installed updated signage including: new room numbers that follow a sequential and consistent system from floor to floor; new room name signs to accurately reflect the function of each room; floor plan signage placed, where possible, to help people identify rooms of interest and aid in wayfinding; and elevator lobby directory boards updated to help people locate boardrooms as well as key areas, such as Security and the Mailroom
- We are working to determine if an electronic accessible wayfinding solution for the visually impaired is a viable option and, if not, what viable alternatives are there.
- We also addressed accessibility issues in our Toronto workspace by fitting-up and moving our Toronto office to a new location. Other regions will be addressed in future years.

Information and communication technologies

Barriers we identified:

- Accessibility of our website and mobile site:
 - o readability issues caused by low contrast and thin fonts
 - o checkboxes and radio buttons that are confusing to screen reader users
 - o videos missing captions, audio descriptions or transcripts
 - problems on the mobile site with the quick links menu, auto-scrolling and carousels
 - o difficulties completing our interactive forms, including the date fields
 - o form validation errors that don't disappear after correction
 - assistance features (tooltips) that do not work with some types of assistive technology
 - search function for the mobile site not working with Voiceover
- Platforms and systems:
 - various internal and external systems and platforms are not accessible, some of which are mandated by the Government of Canada

Goal we set: Ensuring clients, stakeholders and the general public do not face barriers when using our interactive web platforms.

Progress update:

- Since the last progress report, we have continued to convert online PDF documents into HTML format.
- We have also archived older publications to ensure the website is relevant, up-to-date, and provides accessible information. PDF documents will remain available on the website as an alternative format.
- We continued to develop products in accessible and plain language formats to ensure that a diversity of rights holders could engage with Commission content and materials. (For example, those with intellectual disabilities, and those who use assistive technologies, such as screen readers.)

Goal we set: Ensuring our website, mobile site, and social media content fully complies with WCAG 2.1, Level AA.

Progress update:

- We revamped the Commission's public website using user feedback we have received since 2021, as well as internal audits and external reports.
- This new website ensures that identified barriers have been addressed. It also provides users with improved navigation and accessibility. For example, we have significantly improved the way information is structured and optimized the search engine.
- We have also improved the keyboard navigation and the mobile experience.

Goal we set: Integrating accessibility into the design of new digital solutions.

Progress update:

 An accessibility designer has been integrated, on an ad hoc basis, in the development of new digital solutions.

Goal we set: Ensuring our employees have access to internal and external systems (i.e., electronic document management systems, case management systems, human resource systems, financial systems, access to information and privacy system and library system).

- This year we replaced our ATIP case management system (Access Pro) with a new fully accessible one called ATIPXpress.
- The new system significantly improves the overall accessibility of our ATIP case management system.
- We are now focussed on replacing our document management system, eDocs, to improve accessibility.

• The Commission will continue to explore more accessible alternatives for other internal systems and work to find solutions to help address barriers presented by some government-wide applications introduced by the Government of Canada.

Goal we set: Aiming for website compliance with WCAG 2.1, Level AAA.

Progress update:

- Our newly revamped website better ensures compliance with the WCAG 2.1 Level AA standards. It displays information from the perspective of the user and the task they are hoping to complete.
- The new website prioritizes usability and accessibility standards. It is based on the Web Experience Toolkit, which provides templates that are accessible, usable, and interoperable. The Web Experience Toolkit conforms to the Web Content Accessibility Guidelines (WCAG 2.0) AA and leverages both HTML5 and Accessible Rich Internet Applications (WAI-ARIA) to further enhance accessibility.
- That said, the Commission will continue to aim to increase its compliance with AAA standards whenever possible.

Goal we set: Our employees will receive the training and tools they need to help the Commission achieve our accessibility goals for information and communication technologies. We will provide training to build accessibility and disability awareness.

Progress update:

• Training material and tools have been made available to help employees create accessible documents, emails, and presentations.

Communication (other than information and communication technologies)

Barriers we identified:

 Some of our videos do not have American Sign Language (ASL) and Langue des signes québécoise (LSQ)

Goal we set: Recognizing that Sign languages are the primary languages for communication by many Deaf, deafened and hard of hearing people in Canada.

Progress update:

Over the past year, we have produced new ASL and LSQ videos on key documents. They
include: the Commission's Accessibility Progress Report from 2023 and the Accessibility
Commissioner's message for his 2023 Annual Report.

• We have also collaborated with a media company to provide information related to the discrimination and accessibility complaint processes to the deaf community. This resulted in producing a video in ASL format.

Goal we set: Our employees will receive the training and tools they need to help the Commission achieve our accessibility goals for communication.

Progress update:

- Over the past year, the Commission has promoted its Accessibility Toolkit, training and best practices to staff. This was done via the internal newsletter, the placement of information on the homepage of the intranet, as well as on the TVs located at Commission headquarters.
- This year, the Commission developed internal policy and guidance documents to help staff understand the different standards to meet for public information. This includes accessibility of the documents, but also the plain language.
- With the launch of Microsoft 365, staff have now access to improved accessibility and plain language tools at their disposal.
- Our Web Services team members have continued taking training on Web accessibility.
 Once the WCAG 2.2 standards are released, the Web Services team members will take a refresher course.

Procurement of goods, services and facilities

Barriers we identified:

- Our contracting directive does not provide enough guidance to ensure Commission employees do not inadvertently create new barriers when they purchase goods and services
- Our process for hiring third parties to provide services on the Commission's behalf does not emphasize accessibility

Goal we set: Strengthening our contracting directive to ensure that the goods and services we obtain do not create accessibility barriers.

- We strengthened our contracting directive so that considering accessibility is a built-in requirement in our provision of goods and services.
- We revised the directive to make accessibility a key priority. This helps ensure there is an appropriate challenge function if a contract does not identify an accessibility feature.
- We made the revised policy and procurement forms available to staff on the Commission's intranet.

Goal we set: Ensuring that contracted organizations are provided with our accessibility policies, practices and processes.

Progress update:

• The procurement team and technical authorities are monitoring contracts to ensure that suppliers comply with our accessibility requirements as specified in the contracts.

Goal we set: Our employees will receive the training and tools they need to help the Commission achieve our accessibility goals for procurement.

Progress update:

• We are currently gathering materials to provide training and tools to employees so they can help the Commission achieve our accessibility goals for procurement.

Design and delivery of programs and services

Barriers we identified:

- The Commission's discrimination complaints process is complicated (i.e., the forms required to file a discrimination complaint under the Canadian Human Rights Act, and the forms used during the process)
- Some complainants do not have enough ways to communicate with the Commission during the complaints process
- Some complainants cannot access the information and documents they receive from respondents
- Communicating through case numbers is not accessible for screen readers
- We lack relevant and current demographic data, including data on disability, which can help us design our programs and services

Goal we set: Providing better access to justice by improving the accessibility of our complaints processes and making better and more accessible products from the start.

- We are updating our complaint infrastructure with a new case management system that simplifies the intake and processing of human rights complaints. The goal is to improve how we input, track and update complaint information, and better manage our disaggregated data. The new system will allow us to report better on disaggregated data related to the complaints we receive, which will improve our analysis and our decision-making. In turn, this will help us create more inclusive and accessible services for the people who come to us needing help. We are aiming to launch the Commission's first iteration of the new case management system in fiscal 2025–26.
- We are updating the Complaints Services Branch Accommodations Policy to become an Accommodations Policy for members of the public who participate in any of our legal processes under the <u>Canadian Human Rights Act</u>, the <u>Accessible Canada Act</u> and the <u>Pay</u> Equity Act. This updated policy will be made available in 2025.
- Email is now our preferred method of communication on human rights complaints. The
 templates used to share our complaints kit have been updated to let complainants know
 that they can submit their complaint by email, online or by mail. Also, an individual
 filling out an online form automatically receives a copy of their form by email, in PDF
 and in HTML format. We continue to invite feedback regarding the accessibility of our
 forms and templates.
- The subject line of our human rights complaints emails now includes the parties' names and file number based on feedback from our blind stakeholders; the file numbers follow the parties' names in the subject line as a result of that feedback. We continue to review all templates and email communication to ensure they are inclusive, accessible and in plain language.
- This past year, the Commission's Complaints Services Branch addressed other types of accommodation requests from rights holders at different stages of our complaint process. For example:
 - we have coordinated translation and interpretation services when complainants have requested services not in English or French, including requests for ASL and LSQ interpretation
 - we have accommodated the diverse needs of rights holders with respect to the type, time, and duration of our communications and services — allowing rights holders a measure of control over the pace of specific aspects of the complaints process while also taking into consideration procedural fairness obligations that are owed to all parties. This is also in line with our trauma-informed approach.
- We are welcoming accommodation requests throughout our Mediation and Conciliation process by allowing space for discussion with the parties about their accessibility needs with the aim of providing appropriate accommodations at every step of the Mediation or Conciliation process, and removing barriers to full participation.

We have updated our Mediation Procedures and created a checklist for mediators. This
work will help ensure that Mediation services are efficient, inclusive and that we meet
accommodation needs. While virtual mediation and conciliation is now our standard
practice, we hold in-person mediations and conciliations as an accommodation. The
Commission has also enlisted ASL and LSQ interpretation services as well as translation
services when needed for mediation and conciliation files.

Goal we set: Collecting disaggregated data about people who use our complaints process, including information on disability.

Progress update:

- New complainants who submit their complaints to the Commission using our online complaint form now automatically receive an invitation to participate in our voluntary demographic data survey. Complainants who submitted their complaints to the Commission by mail or email as far back as fiscal year 2023–24 receive a paper or emailed survey that retroactively collects their voluntary demographic data.
- We will conduct a comprehensive analysis of all survey responses collected via different channels and a report will be produced by the end of fiscal 2024–25.

Additional actions we have taken to improve and promote accessibility

- Commission executives participate in regular inclusion, diversity, equity, accessibility
 and anti-racism (IDEA-AR) meetings where they brief each other on their team's
 contributions to the Commission's action plans, and their ongoing efforts to promote an
 accessible and inclusive workplace for all.
- The Commission met with Employment and Social Development Canada to identify accessibility data performance indicators to assist them in meeting their measurement objectives. This will also be informed by disaggregated Commission complaints data on human rights complaints that site the ground of "disability."
- We responded to feedback and adjusted documents used with external stakeholders to improve the accessibility of those documents.
- We continue to support and encourage training on accessibility and procurement of accessible services and products (e.g., software).
- We conducted user testing to ensure business systems and interfaces are accessible for internal and external users (e.g., our accessibility inspection database).

- We supported the Federal Housing Advocate in issuing two letters advocating the human rights of people with disabilities be upheld as it relates to accessible housing and the National Building Code:
 - o <u>In the first letter</u>, the Advocate wrote to Minister Fraser and Minister Khera to call on the Government of Canada to ensure that all housing options in the catalogue of blueprints are based on universal design principles and are either accessible or adaptable.
 - In the second letter, the Advocate wrote to the same Ministers alongside Minister Virani and Minister Champagne to advance five recommendations, including: 1) improving consultation process for changes to the national building code for persons with disabilities; 2) developing a more comprehensive accessibility standards for small scale housing; 3) improving current accessibility standards for multi-residential buildings 4) explicitly incorporating Canada's international and domestic human rights into mandates of code developers; 5) undertaking and publishing further research on the risks that current building codes present for people with disabilities and seniors.
- In June 2024, the Commission, in its role as the body responsible for monitoring Canada's implementation of the Convention on the Rights of Persons with Disabilities, and the Federal Housing Advocate released a new monitoring project. Together we have created a framework to track Canada's implementation of the right to adequate housing for people with disabilities. The preliminary framework findings confirmed that people with disabilities are overrepresented in nearly all aspects of inadequate housing and homelessness. The framework is published on the web and was developed with the input of people with disabilities, their families and caregivers, including those who have experienced homelessness and inadequate housing.
- The Commission continued to ensure that the principles such as accessibility, intersectionality, and "Nothing Without Us" continued to guide us in developing our monitoring framework on the right to adequate housing for people with disabilities.
- We continued to engage with disability communities, including when developing
 projects and materials. We made sure our engagement events were inclusive and
 accessible. For example, we provided Sign language interpreters, live captioning and
 documents in accessible formats. We compensated participants for their contributions,
 using the Commission's Stakeholder Compensation Policy. We also asked participants
 for feedback to help us improve our events.
- The Commission also developed and published a suite of tools and resource documents this year for federally regulated employers on their human rights obligations with respect to accommodating workers.
- We continued to engage with staff, delivering presentations on the Commission's new workplace accommodation guidance documents to raise awareness.

Ongoing training

Goal we set: Our employees will receive the training and tools they need to help the Commission achieve our accessibility goals for the design and delivery of our programs and services.

Progress update:

- To mark National AccessAbility Week in May 2024 and its theme, Forward Together: Accessibility and Inclusion for All, the Commission provided organization-wide training to its employees on:
 - "Inclusion at work" training on disability awareness delivered by the John
 Humphrey Centre for Peace and Human Rights, hosted by the IDEA-AR division.
 - "Why does accessibility legislation matter?" a presentation followed by a
 discussion on consultation of people with disabilities and what can be done to
 ensure that everyone is meaningfully included, hosted by the Office of the
 Accessibility Commissioner
- The Commission is developing a new fully accessible onboarding program to ensure employees who are responsible for screening human rights complaints receive consistent and comprehensive training. The onboarding program will be available on an internal online platform to help coordinate ongoing training for Commission staff who deal with human rights complaints. It will serve as a "one-stop shop" to ensure employees handling complaints have access to the most up-to-date training, including multiple units about accessibility.
- In May 2024, focused training was provided to Commission employees on the duty to accommodate and undue hardship. Further training is planned focusing on how to apply accommodation guidelines. All training will be catalogued and made available to all future employees during onboarding to ensure accessibility training an essential part of early learning.

Transportation

The Commission does not provide transportation services to the public.

Conclusion

The Commission holds firm in our understanding that accessibility remains an ongoing and ever evolving set of goals and practices and conversations. The work is never finished because our processes, our technologies, and the needs of the people we serve and work with are also ever evolving.

Understanding this, the Commission will continue to monitor and measure our accessibility progress to make sure we are not only meeting our accessibility goals set out in our plan, but that we are constantly striving to be better in removing and preventing barriers for people with disabilities in Canada. We will ensure that our efforts remain ongoing in engaging and raising awareness about accessibility. And we will continue to ensure that accessibility is built into all that we do, and across all our lines of service.

Over the coming year, the Commission will prepare an updated Accessibility Plan, revising and building upon our first iteration. It will allow us to take the invaluable feedback we have received on our current plan and let it inform a set of updated goals and actions. Ongoing input from our employees, stakeholders, rights holders and people with lived experience will help us better understand how we are improving and where we can focus our continued efforts.

At the heart of accessibility is ensuring that every voice matters and every voice is heard.