



Canadian  
human rights  
commission

Commission  
canadienne des  
droits de la personne

Human Rights

# Canadian Human Rights Commission Accessibility Plan Progress Report

December 2023

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Cat. No.: HR4-86/2022E-PDF  
ISSN: 2817-0180

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# Overview of our accessibility progress

The Canadian Human Rights Commission is pleased to present its first Accessibility Plan Progress report. It outlines the progress we are making in implementing the concrete actions identified in our [2023-2025 Accessibility Plan](#).

For the Commission, accessibility is about more than complying with a federal law. Our unwavering commitment to accessibility is at the heart of who we are. We strive to be an inclusive and barrier-free organization for everyone we serve and everyone we employ.

As an employer, our priority is to offer a barrier-free environment for our employees. Accessibility touches all aspects of the employee experience, including recruitment, onboarding, retention, promotion and learning and development. It comprises our leadership in the built environment, employment and information and communications technologies. The Commission commits to ensuring every employee can contribute, succeed, and participate in our organization to the greatest extent possible.

As a service provider, our priority is to offer a barrier-free experience for people in Canada interacting with us. Accessibility ensures that everyone feels welcome and can participate fully. This spans all aspects of how we operate. From the procurement of goods, services and facilities to the design and delivery of the programs and services the Commission offers and supports. This includes our complaints process, our information, platforms and tools, and our advocacy work and engagement with the public.

Accessibility in our services is vital since we offer access to justice to people in Canada who have been treated unfairly. Accessibility is also a key guiding principle in our role as the body responsible for monitoring Canada's implementation of the United Nations Convention on the Rights of Persons with Disabilities (CRPD).

We appreciate that people with disabilities have unique and complex identities that shape their experiences. Many also experience forms of exclusion because of their race, sexual orientation, and gender identity. Our work is informed by our recognition of this through an intersectional lens.

Over this past year, across all our roles, the Commission has made great strides towards improving accessibility. We have improved our hiring practices, policies, and processes. We have offered training and tools to staff. We have continued removing barriers to our website. We have provided our Accessibility Plan in American Sign Language (ASL) and in Langue des signes québécoise (LSQ). We have updated our contracting directive and stakeholder relations practices to ensure accessibility is a key priority. We have continued to ensure our products, reports and engagements are accessible and inclusive to a diversity of rights holders. We have also explored how to improve our complaint processes, policies, and forms.

Although we made great progress this year, we know that much more work is still ahead. Our Accessibility Plan remains an ongoing commitment and is now embedded into every facet of our organization. Together, Commission employees from all levels of the organization are working to implement this Accessibility Plan. We will continue implementing the Plan in partnership with other Commission-wide efforts towards anti-racism, equity, and inclusion.

As we continue our work, we will rely on feedback from our employees, rights holders and people with lived experience, and stakeholders. We are approaching this with the key principles of “[Nothing Without Us](#).” And we remain committed and determined to identify, eliminate, and prevent barriers to accessibility.

As you read this progress report, you will find we have organized our progress by the same seven key areas outlined in the [Accessible Canada Act](#). They are: employment; built-environment; information and communications technologies; communications; procurement of goods, services and facilities; design and delivery of programs and services; and transportation.

The Commission remains committed to creating environments, services and experiences where everyone can belong, and feel valued and respected.

# General

## About our feedback process

We have designated our Director General, Corporate Management Branch, to receive feedback on behalf of the Commission.

You can send feedback anonymously or you can include your name and contact information.

You can provide feedback in the following ways:

- Send an email to [info.com@chrc-ccdp.gc.ca](mailto:info.com@chrc-ccdp.gc.ca)
- Call by telephone at 1-888-214-1090 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

We will confirm that we have received your feedback.

### *Alternate Formats*

You can ask for a copy of our Accessibility Plan Progress Report or a description of our feedback process in one of these alternate formats:

- Print
- Large print
- Braille
- Audio format

### *Electronic formats*

We will send you the document within 15 days. For Braille and audio formats, we will send them to you within 45 days.

# The areas of our Accessibility Plan

## Employment

Our goal is to create a workplace that includes, empowers, and supports every employee. This includes every aspect of employment: recruitment and onboarding, career development, promotion, and departure. We are working to become a disability-confident organization. Last year, the Commission worked on improving its employment processes and practices to make them more accessible for all.

### *Hiring practices*

- We implemented the amendments to the [Public Service Employment Act](#) to ensure our recruitment processes and hiring practices are free of bias and barriers and take steps to remove or mitigate their impact, if applicable.
- We revised our Guidelines on the Duty to Accommodate and expanded its application to candidates participating in recruitment processes.
- We have a team of HR advisors committed to continuously learning about accessibility in hiring processes and improving hiring practices.
- We use our Employment Equity Action Plan to establish strategic staffing strategies to continue meeting or surpass representation targets in each of the four designated groups. They are: women, Aboriginal peoples, persons with disabilities, as well as Black and racialized persons
- We continue to emphasize our commitment to providing candidates with an inclusive, barrier-free experience. For example, we are allowing candidates to complete a three-hour evaluation over 72 hours. In turn, they can better manage their time, take regular breaks, and avoid undue stress.
- We encourage candidates to request accommodation measures throughout the hiring process and aim to provide them with an inclusive and barrier-free experience.
- We ensure that hiring managers place value on candidates with disabilities, on the unique abilities, lived experience and perspectives they would bring to the job.
- We continue to explore ways to reach employees with disabilities for our current and anticipated staffing needs. For example, we identified people with disabilities as an organizational need in a recently advertised process. We also participated in a Career Fair for Students and Recent Graduates with Disabilities in November.

### *Employment practices*

- We developed an easy, clear, and confidential process for accommodating employees per our revised Guidelines on the Duty to Accommodate.

- We implemented the Commission’s 2023-26 Employment Equity Action Plan and plan to revise it in 2024, following TBS’ departmental workforce analysis report in March 2024.
- We have enhanced our Memorandum of Understanding (MOU) with the Ombuds for Small Departments and Agencies (OSDA) to allow our employees to provide confidential feedback. This includes insights into their reasons for staying with or departing from the Commission. These voluntary and confidential stay and exit interviews serve as a temporary solution while we work towards establishing our independent program once we have the necessary internal resources in place.
- We encourage using the Government of Canada’s [Workplace Accessibility Passport](#) and promote it throughout our internal policies.

### *Training*

- We recently revised our Guidelines on Mandatory Learning and Training and have made “Making Documents Accessible” and “Addressing Disability, Inclusion and Barriers to Accessibility”, for example, foundational learning activities for all employees.
- We plan on further developing these guidelines in 2024, by adding branch-specific or role-specific learning and training activities. The Complaints Services Branch has already initiated this planned activity. They are developing an interactive training program to ensure their staff involved in the complaints process receive consistent and comprehensive training when joining the Commission.

## **Built environment**

Maintaining the accessibility of our built environment remains a top priority. With all our Commission offices already certified as accessible, we continue to identify and remove any barriers in our built environment.

- In 2021, the Rick Hansen Foundation conducted accessibility assessments of our built environment. Our Accessibility Action Plan identified several actions further to the assessments, including improvements that the Commission can implement as a tenant or through its service agreement with Public Service and Procurement Canada. For instance, several action items in our Ottawa tenant space have been completed. These include:
  - providing sit stand desks, ergonomic chairs and task lighting at all workstations,
  - installing power-operated door openers,
  - reconfiguring all cubicles and widening the corridors to ensure they are wheelchair accessible,
  - adding task lighting to all workstations to give employees more control over the level of light at their workstation,
  - reconfiguring the security reception desk to provide sufficient knee clearance, and
  - providing outlets at an accessible height.



- Other changes are underway for the Ottawa office, such as establishing a multipurpose room used for prayer, breastfeeding, or quiet space. We will address accessibility by relocating the Toronto Office in fall 2023. Other regions will be addressed in 2024.
- The Rick Hansen assessments also identified changes to our built environment that fall under Public Service and Procurement Canada’s responsibility. We have shared the assessment report with PSPC.

## Information and communications technologies

The Commission continues to ensure everyone can access the same information and receive the same services using information technology. This is done by ensuring our website, mobile site, web applications, electronic documents, software, and hardware do not create barriers for people with disabilities.

### *Accessibility for our employees*

- We started deploying Microsoft Office 365 in July 2023. Since then, we have provided training and learning tools to all staff.
- We have created the Accessibility Toolkit, which explains how to create accessible documents for each format. We share this resource regularly with our staff. In addition, we required staff to take mandatory training offered by the [Accessibility, Accommodation and Adaptive Computer Technology \(AAATC\)](#) or an accessibility workshop created in partnership with the [Canada School of Public Service](#).
- We have purchased several [Visible Thread Writer](#) licences. This software performs a plain language analysis of documents and content. The Commission provided training for a few “superusers”. These users are now able to assess documents to ensure the readability level matches the target audience.

### *Accessibility for our clients, stakeholders and general public*

The Commission's first door to the public is its website. It is of the utmost importance that we ensure clients, stakeholders and the general public do not face barriers when using our interactive Web platforms.

- Over the last year, we converted all our public complaint forms into HTML. This also includes the Pay Equity Request for Information Form and the Housing submission tool.
- We are prioritizing converting our 300 online PDF documents into HTML format. This work is well underway, and many documents are now available on the website. This includes products and reports related to our designation as the body responsible for monitoring Canada’s implementation of the Convention on the Rights of Persons with Disabilities. We will also archive 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 have conducted a comprehensive review of our website’s accessibility and have hired a consultant to fix technical issues. For example, we have improved keyboard navigation, disabled animation and corrected other technical issues.
- We have initiated the revamp our website and this work will continue over the next year. We will also consult with people with disabilities and the organizations that represent them.
- We have introduced software called [Read Speaker](#) so that users can choose to have a webpage read without using a screen reader.

## Communications

The Commission continues making accessible communication a permanent part of our culture. It is the way we reach our employees and our diverse audiences.

### *Internally*

- Communication is critical to ensure the safety of everyone when there’s an emergency. This is why the Commission hired a consultant to review and update the emergency handbook and building evacuation code. This review ensured we include people with disabilities and how to ensure their safety during an emergency.
- Our emergency handbook is now available on the Intranet. We shared it with staff as part of our return to the office plans. We will turn our attention to develop an emergency handbook for the regional offices.

### *Externally*

- We made sure to provide alternative formats of our Accessibility Plan after its launch last year. We created and posted ASL and LSQ videos, and an audio version for our Accessibility Plan on our website.
- We regularly provide documents in alternate formats when requested.
- We have created a procedure for alternate formats. We informed our staff about this new procedure and the required timeframe. It includes sending documents in 15 days or less. For Braille and audio formats, sending them in 45 days or less.
- We make best efforts to make accessibility services and alternate forms of communications available to facilitate stakeholder participation, including: sign language interpretative services, CART captioning services, and choice of communication by phone or email.

### *Training*

- All Web Services team members have Certification in 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

The Commission continues to imbed accessibility into its procurement policies, processes, practices, and in the procurement of goods and services.

### *Procurement*

- We are strengthening our contracting directive to ensure that the goods and services we obtain do not create accessibility barriers. Over the last year, we have 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 are updating all procurement forms to ensure they are accessible and in line with the revised directive on accessible procurement. We will publish the revised policy and forms on the intranet before the end of December 2023.

### *Services*

- We are ensuring external venues for our stakeholder meetings do not create barriers to participants with disabilities. We are ensuring we provide a consistent level of accessibility and remove any barriers when planning annual stakeholder engagement sessions, including engagements that are planned with a diversity of rights holders in our role as the body responsible for monitoring Canada's implementation of the CRPD.
- We have developed Guidelines on External and Stakeholder Engagement, published in April 2022. The guidelines contain accessibility questions and tips to help staff pose the right questions when planning an engagement. We will bolster them to capture a list of service providers with whom the Commission has worked to ensure bilingual and accessible virtual events. A similar list will be compiled and will comprise accessible venues and caterers. We will make an updated version available on March 31, 2024.

### *Facilities*

The Commission will be implementing the Treasury Board Secretariat Hybrid Directive starting November 2023. Based on this hybrid model, most employees will be rotating through the workplace two days a week.

## Design and delivery of programs and services

This past year, informed by user and stakeholder feedback, we have continued working towards providing barrier-free programs and services. We are committed to improving the accessibility of our complaints, audits and enforcement processes, including by building accessibility into our various products from the start.

### *Access to justice*

- We have implemented system-wide changes to improve access to justice. These changes will also help us meet our service commitments and build in equity throughout a service lifecycle. This includes facilitating user testing with persons with lived experience for many of our modernization initiatives.
- We have updated our human rights [Complaint Rules](#). They now include language around inclusion, accessibility, official languages, and clarifications related to gender inclusion and not referencing a transgender person's "[dead name](#)."
- We are reviewing our internal Procedures Manual for human rights complaints staff to ensure that it is inclusive and accessible. For example, we are adding best practices for complaints where jurisdiction is not clear. In turn, it ensures our approach is similar to the approach taken under [Jordan's Principle](#) in cases involving the delivery of services to First Nations children.
- We worked with an external firm this past year to ensure the human rights [complaint process forms](#) on our website are accessible. We also consulted several users with disabilities using a variety of assistive technologies to review the forms.
- We are reviewing our human rights complaints templates and email communications to ensure that they are inclusive, accessible, and plain language. For example, we use the plain language software 'Visible Threads' to ensure the appropriate reading level.
- Our Accessibility Unit is designing an inspection database to provide an accessible interface for employees. The accessibility of the database will be confirmed by conducting user testing. More precisely, the Accessibility Unit will engage rights holders and regulated entities on the design of its complaints process and key tools.
- We continue to provide the option of issuing audit or inspection reports in alternate format to employers upon request.

### *Disaggregated data*

The Commission recognizes the importance of data analysis in identifying trends and patterns. It informs our decision-making process and improves the way we serve the people who use our system.

- Over the past year, we launched the replacement project for our human rights case management system. We expect to launch the new system in 2025-2026, that it will allow us to better track processing of complaints and improve reporting capabilities. In turn, this will help us create more inclusive and accessible services.

- In March 2023, we launched an integrated data collection strategy focused on collection of disaggregated demographic data from those accessing our services. A demographic data survey is now linked to the new expanded online complaint form. Collecting demographic data from those using traditional forms of engagement with the Commission (e.g., mail) will be the next area of focus.
- We are exploring ways to build an internal data collection system that will allow access to accurate and timely human resources data to monitor trends, and compare them with other available data.
- We are developing a joint monitoring framework in the Commission's role as the CRPD monitoring body and with the Office of the Federal Housing Advocate. The objective of this framework is to monitor the progressive realization of the right to adequate housing for people with disabilities in Canada. This includes using disaggregated data results to highlight data gaps and to assess progress in relation to this important area of human rights.

#### *Accommodation needs*

With access to justice as a priority, we are committed to ensuring everyone in Canada can fully participate to the greatest extent possible when accessing our complaint process.

- 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 [Canadian Human Rights Act](#), the [Accessible Canada Act](#) and the [Pay Equity Act](#). This updated policy will be published in 2024.
- This past year, we received various types of accommodation requests from people at different stages of our complaint process. For example, we have coordinated translation services when the request is not English or French, including ASL and LSQ requests.
- We have revamped our mediation services to allow discussion with the parties around accessibility needs. This ensures we provide proper accommodations ahead of mediation sessions to remove all barriers to full participation.
- We have updated our Alternative Dispute Resolution 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 is now our standard practice, since April 2023, we hold in-person mediation as an accommodation. The Commission has also enlisted ASL and LSQ services when needed during mediation.

#### *Training*

We continued to promote accessibility awareness through events that target disability inclusion.

- To mark [International Day for Persons with Disabilities](#) on December 2, 2022, the Commission organized a presentation delivered by Award-Winning Champion of Inclusion, Diversity, Equity & Accessibility, Lorin MacDonald. She has been a human rights lawyer, disability subject matter-expert, and accessibility advocate for over 30 years.

- During [National AccessAbility Week](#) in May 2023, the Commission delivered training to its employees on disability history and justice. This training, called "History of disability: From Pity to Protests and Pride", covered topics such as types and models of disability, evolving language, stereotypes, institutionalization, eugenics, and the disability rights and justice movements."
- Our Accessibility Unit has identified training needs through their training plan. Their training plans also integrate learning and development into service and program delivery. For example, unconscious bias, disability and human rights law, inspector and investigator training.
- Human rights complaints staff and inspectors have been trained to use [NonVisual Desktop Access](#) (NVDA), a screen reader, along with receiving training on how to work with parties to address accommodation and access needs.
- We are exploring training that would benefit inspectors who have received different kinds of training. For example, the Web Content Accessibility Guidelines and a presentation delivered to the Commission staff on disability inclusion.

## **Transportation**

The Canadian Human Rights Commission does not provide transportation services to the public.

# Consultations

The Accessible Canada Act requires the Commission to consult persons with disabilities in preparing its progress reports. We conducted consultations for our first progress report with the principle of “Nothing Without Us.”

## What we consulted on

As part of our consultations, we asked participants to provide feedback on their experiences interacting with and working at the Commission. We invited participants to tell us about the type of interactions they had, and any barriers they experienced. We also invited them to provide suggestions on how we can further improve.

## When we consulted

In Fall 2023, we sought feedback from our employees with disabilities and lived experience, other individuals with disabilities, and disability organizations.

## Who was consulted

We invited several individuals and organizations to participate in our consultations. They represent a cross-sectional lens of disability and advocacy for equality, diversity, and inclusion. Stakeholders we invited to provide feedback include:

- Arch Disability Law Centre
- Alliance for Equality of Blind Canadians
- The British Columbia Aboriginal Network on Disability Society (BCANDS)
- Canadian Association of the Deaf
- Canadian Alliance on Race and Disability (CARD)
- Canadian Autism Spectrum Disorders Alliance (CASDA)
- Canadian Council of the Blind
- Canadian Mental Health Association (National)
- Canadian National Society of the Deaf-Blind, Inc.
- CNIB - Canadian National Institute for the Blind
- Council of Canadians with Disabilities
- Communication Disabilities Access Canada
- Canadian Council on Rehabilitation and Work
- DisAbleD Women's Network of Canada (Dawn Canada)
- Eviance
- Guide Dog Users of Canada
- National Coalition of People who use Guide and Service Dogs in Canada
- NEADS - National Education Association of Disabled Students
- Realize Canada
- Spinal Cord Injury of Canada
- Inclusion Canada
- Canadian Hard of Hearing Association
- Barrier-Free Canada

- Canadian Centre for Diversity and Inclusion
- Accessibility for All
- ASE Community Foundation for Black Canadians with Disabilities
- Ontario English Catholic Teachers Association
- Hauser & Associates Ltd.
- Persons With Disabilities Network, Health Canada
- The Mosaic Institute
- Make a Difference Through Inclusion Ltd. (MADTI)

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

## **How we consulted**

The Commission ensured the consultations were inclusive and accessible. The consultations on the Commission’s Accessibility Plan first progress report took place in two stages. First, we completed an external consultation to provide external insights on the Commission’s progress implementing its Accessibility Plan. We invited people to submit their written feedback by email. We accommodated virtual one-on-one meetings by request for added accessibility.

Second, we consulted our employees. Of the people we talked to, some have disabilities, some are racialized, and some are part of other equity deserving groups. We invited all employees to virtual group discussions, while emphasizing the importance of hearing perspectives from employees with lived experience and allies. Employees were also able to submit written comments. We invited written comments from our unions and our internal Decolonization and Anti-Racism Consultation Committee.

## **What we learned from our consultations**

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

- Raising awareness on accessibility, especially around non-visible disabilities, and promoting our accessibility work;
- Sharing best practices on conducting accessible meetings and events and exploring ways to align our approach;
- Creating accessible documents and continuing training with all employees;
- Continuing growth conversations with employees and exploring ways to support their development and career progression;
- Fostering accessibility and inclusion in the hybrid work environment;
- Leveraging technology, tools, and website renewal as a means to increase accessibility;
- Leading by example and striving for leadership as an accessible and inclusive organization;
- Creating safe spaces and modelling inclusive leadership behaviours at work;
- Finding other ways to seek advice from and engage with employees with disabilities, such as through the creation of a consultation committee or network;



- Exploring ways to collect feedback, as well as anonymous feedback, on a more frequent basis through different mediums (meetings vs. written comments);
- Providing flexibility in our approach to accommodations as much as possible to help provide a barrier-free experience for people using our complaints system;
- Designing systems, platforms, tools and related processes with user experience in mind to help anticipate and prevent barriers for people with disabilities, in particular the Blind community;
- Collaborating with human rights partners across jurisdictions to remove barriers for people with disabilities, for example aligning approaches to and definitions of service dogs.

The Commission’s Accessibility Plan identifies actions to improve our systems, processes, tools and supports in order to remove and prevent barriers. Such actions include a focus on training for example. Continued commitment to these priorities and actions will help us address the points raised during our consultations. We have also identified future opportunities to go further based on what we learned from our consultations ([Key opportunities](#)).

## Feedback

The Commission recognizes 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 its 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.

In 2023, the Commission received feedback about inclusive language used in our reports and communications. Feedback emphasized the importance of using inclusive terminology and avoiding language such as “the Commission’s vision” and “what we heard.” Further to this, the topic of inclusive language was discussed with the Commission’s internal accessibility steering committee. Training was also delivered to all employees in February 2023 regarding [ableism](#), which touched upon the importance of inclusive language.

# Key opportunities

This section provides more detail on key opportunities the Commission has identified and is exploring while creating, implementing, or updating its accessibility plan.

- In 2023, the Commission appointed a Director of Inclusion, Diversity, Equity, Accessibility and Anti-Racism. The creation of this new dedicated role presents a key opportunity to align the Commission’s approach to matters of accessibility, diversity and inclusion. The Commission also created the role of Special Advisor, Accessibility, to lead accessibility implementation.
- The creation of new dedicated roles also presents an opportunity for the Commission to consider its internal governance structure related to accessibility and inclusion. Doing so will help strengthen accountability, long-term sustainability, and support the integration of accessibility priorities.
- We have identified potential for greater internal and external promotion about the work that we do related to accessibility. There is also an opportunity to continue efforts to raise disability awareness with all employees.
- The Commission continues its focus on modernization to strengthen the user experience for people using our tools, platforms, and services. With this in mind, there is an opportunity to explore ways to streamline how we collect and analyze feedback related to accessibility. As we explore new data collection solutions, there is potential to increase regular promotion of our feedback mechanism, and to bring more sophistication to how we collect employee feedback.
- We continue to be mindful of “consultation fatigue” within the stakeholder community, and we are exploring ways to help ensure meaningful engagement without overburdening the community. We are also considering other ways to engage with and consult internally with employees with disabilities.
- The Commission is welcoming employees back to the office and is implementing a hybrid approach. Employee experience will continue to be top of mind as the transition continues. Understanding that accessibility is not one-size-fits all, seeking continuous feedback and engaging our employees in finding solutions will help us be flexible in our approach.