



Canadian Radio-television and
Telecommunications Commission

Conseil de la radiodiffusion et des
télécommunications canadiennes

Canada



ACCESSIBILITY PROGRESS REPORT

Canadian Radio-television and
Telecommunications Commission

2023



ISSN: 2817-9285

Cat. No.: BC9-40E-PDF

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General

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¹ You may request a copy of our accessibility plan, progress report, or a description of our feedback process in: Print or large print; braille; audio format; or electronic format compatible with adaptive technology.

Message from the Chairperson and Chief Executive Officer

On behalf of the CRTC, I am pleased to present the Progress Report for the first year of our Accessibility Plan.

I am proud of the progress we have made in just the first year of our plan. We have put in place many of the tools that will help us achieve our goals, including launching an accessibility hub to ensure Canadians can more easily access CRTC information, adopting measures to assist any participants requiring accommodations during our hearings, and making sign language content easier to access on our website.

Though we are pleased with our progress thus far, we know we still have much more to do. As we continue our work, we welcome input from those who still face barriers.

We are committed to creating a CRTC that is fully accessible and inclusive for all our employees and the Canadian public.



Vicky Eatrides

Chairperson and Chief Executive Officer

Summary

The Canadian Radio-television and Telecommunications Commission (CRTC) is a quasi-judicial tribunal that operates at arm's length from the federal government. We regulate broadcasting and telecommunications in the public interest.

The **Accessible Canada Act** requires the CRTC to publish accessibility plans and progress reports that describe the actions taken to implement our plans.

Successfully implementing our plan means identifying, removing and preventing barriers for persons with disabilities when the CRTC interacts with the public and its employees.

In the first nine months since launching its 2023-2025 Accessibility Plan in December 2022, the CRTC implemented the measures below.

Promoting accessibility-specific training and resources

- We implemented and promoted new mandatory accessibility training.
- We offered sessions on autism and bipolar disorder, and have a session on neurodiversity scheduled. Before the end of the year, we plan on giving awareness training on Deaf culture and communication with persons who are Deaf and use sign language.
- We hired an accessibility expert who is a member of the Deaf community and has experience living with multiple disabilities. We staffed three additional resources focused on accessibility, including a Senior Legal Counsel.
- We offered a plain language workshop and provided resources on accessible communications to all employees.
- The Procurement Team completed training on procuring accessible information and on communications technologies.

Promoting the hiring and retention of persons with disabilities

- Following amendments to the *Public Service Employment Act*, we implemented changes to address barriers in the staffing process.
- Executives now have a commitment in their performance agreements to support the accessibility plan and improve the representation of persons with disabilities.

Improving workplace accommodations

- A medical note is no longer required for most equipment-related accommodations.
- Automatically generated captions are available to employees during internal meetings. Communication Access Realtime Translation (CART) services and sign language interpretation are provided as needed.

Minimizing environmental and physical barriers

- We are operating from a temporary office space. While we cannot make permanent modifications to this space, we have conducted a walk-through to identify barriers to consider when we move back into our permanent offices.
- We offer flexible hybrid work arrangements and have a procedure in place for accommodation requests.

Improving the accessibility of our network applications and website

- We have created and staffed an Accessibility Center of Expertise for Information Technology to ensure that all web applications receive accessibility recommendations.

Increasing participation of persons with disabilities in CRTC processes

- We established a formal engagement function to engage with disability communities.
- We encouraged groups representing persons with disabilities to participate in key CRTC consultations.
- We promoted videos in sign language, and we now offer live streaming with closed captioning for all public hearings.

Providing more information in ASL and LSQ

- A centralized budget was established for accessibility-related needs, including ASL and LSQ interpretation, as well as CART services.
- We consulted with members of the Deaf community on how sign language content is presented on our website. As a result, we developed new practices including creating unique ASL and LSQ buttons to make the content easier to find.

As well as these measures not included in our accessibility plan

- We shared a blog post by a colleague living with an invisible disability about their accessibility journey and how the right accommodations can empower and play a big role in someone's well-being.
- We are acknowledging the gap in knowledge and attitudinal barriers around invisible disabilities such as mental health, cognitive disabilities and neurodiversity. We provide monthly tools, training and resources that are inclusive to all disabilities.

Consultations

We reached out to organizations across Canada for feedback on the implementation of our accessibility plan. People who are deaf or hard of hearing, people who are neurodivergent, and people with physical disabilities were represented during the consultations and provided their invaluable knowledge based on their lived experience.

Feedback

We received 16 emails from the public through our accessibility feedback process. These were related to the accessibility of the communications services that the CRTC regulates, rather than to the accessibility of the CRTC itself. They were handled by our Client Services team, in accordance with our regular procedures.

Internally, 2 emails were received and actioned regarding the accessibility and readability of our internal document management system.

What we learned

We heard that you would like us to:

- **improve the accessibility of our website and share updates with the disability community;**
- **build awareness of disability in the workplace and streamline our accommodation procedure;**
- **hire more people with disabilities, especially in management roles;**
- **be more detailed and ambitious with our accessibility plan.**

Challenges

While our sign language content continues to steadily increase, interpreters and translators across the country are facing a growing demand. We are establishing a corporate contract that will streamline the production of content in sign language.

The way forward

The conversation on accessibility at the CRTC is evolving. We have moved from the question of what must be done to how to get it done and started to reflect on how we can be more ambitious in the future.

We acknowledge that the contribution of individuals with lived-in experiences of disability is the driving force behind our cultural change. To create a CRTC that is fully accessible and inclusive for our employees and the Canadian public, we welcome everyone's perspective because accessibility isn't one size fits all.

Introduction

The **Accessible Canada Act** (the Act) came into force in 2019, and aims to identify, remove, and prevent barriers for persons with disabilities in Canada in seven priority areas of which five are particularly relevant to the CRTC as an organization and employer:

- employment;
- the built environment;
- information and communication technologies;
- communication other than information and communication technologies; and
- the procurement of goods, services, and facilities.

The Act requires all organizations under federal responsibility, including the CRTC, to prepare and publish accessibility plans that set out their policies, programs, practices, and services in relation to the identification, removal and prevention of barriers in accordance with **the seven key principles of the Act**.

While the plans must be updated every three years, organizations are also required to prepare and publish progress reports that describe the actions taken to implement their accessibility plans. They must include information on:

- accessibility feedback received by the organization and how they took the feedback into consideration; and
- consultations the organization held with people with disabilities when preparing their reports.

This Progress Report covers the progress we've made since launching our in December 2022. Due to the time needed to review, translate and publish the report in multiple languages, this first report will span a period of eight months, from January 1, 2023 to September 30, 2023. The period from October 1, 2023 to December 31, 2023 will be covered in next year's progress report.

Accessibility at the CRTC

As a regulatory body overseeing over 2,000 broadcasters, including television and radio services, as well as telecommunications providers, such as Internet, telephone, and mobile companies, the CRTC takes to heart the objective of being free of barriers in federally regulated areas by 2040.

In the past months, we have worked hard on reviewing and implementing new procedures and finding new ways to improve accessibility at the CRTC, such as providing mandatory accessibility training and hiring a person from the Deaf community as our accessibility expert.

As we become more aware of accessibility needs, our internal culture is also changing. We are developing new reflexes and gaining a better understanding of what it is truly like to live with a disability, and how it can have a profound impact on someone's life. We are acknowledging that for persons with disabilities, removing barriers is the difference between knowing that potential exists and living out that potential.

Our plan has inspired us to act consistent with the principle of “Nothing Without Us” to make our work environment more inclusive and diverse. We have explored new technologies and methods to communicate with the public and educated our employees to identify, remove and prevent barriers. We started reviewing our accommodation processes to ensure everyone is able to participate fully and equally and have their voices heard, regardless of their background or circumstances.

The following sections will detail the steps we are taking to implement our accessibility plan in the seven priority areas.

Areas in section 5 of the Act

Employment

This priority area will help make sure that all persons have the same employment-related opportunities to make for themselves the lives that they are able and wish to have regardless of their disabilities.

Measures to promote accessibility-specific training or resources

Accessibility Plan Action Step	Action Taken in 2023
The CRTC will assess learning needs or gaps and tailor a learning plan for all employees, managers, and functional specialists ² by August 2023.	<ul style="list-style-type: none">An internal communication was sent to all employees in May 2023 outlining new mandatory and recommended training on accessibility. <p><u>The newly-hired accessibility expert</u> will continue to assess learning needs.</p>

² In the context of the Accessibility Plan and Progress Report, “functional specialist” refers to an employee who works in a service area dealing directly with the public.

Accessibility Plan Action Step	Action Taken in 2023
<p>Mandatory training related to accessibility will be included in all staff learning plans for the 2023-2024 fiscal year and future years.</p> <p>Consistent with these learning plans:</p> <ol style="list-style-type: none"> 90% of employees will have completed the mandatory training by March 31, 2024. 100% of functional specialists will have completed the mandatory training by March 31, 2024. 	<ul style="list-style-type: none"> Mandatory training has been communicated to all employees. As of August 2023, about 25% of all employees had completed the training. <p>The CRTC will continue to monitor and follow up with staff on training completion rates to ensure that we are able to meet our objective. We are hopeful that we will be able to reach 70% by March 31, 2024 and 90% by June 30, 2024.</p>
<p>The CRTC will host two internal presentations per year dedicated to exploring accessibility issues, beginning in the 2023–2024 fiscal year.</p>	<ul style="list-style-type: none"> A session on autism took place in the summer of 2023. A testimonial on bipolar disorder was offered in October 2023. A session on neurodiversity is scheduled for November 2023. Awareness training on Deaf culture and effective communication with persons who are Deaf and use sign language is planned for December 2023. <p>The CRTC will continuously ensure that learning opportunities meet employee and organizational needs while supporting mental health and well-being and fostering a culture of accessibility.</p>

Accessibility Plan Action Step	Action Taken in 2023
<p>The CRTC will continue to advertise courses by the Canada School of Public Service (CSPS) on accessibility and disability available to its employees, while exploring other learning opportunities that may benefit the organization.</p>	<ul style="list-style-type: none"> • Courses offered by the CSPS were shared with all employees during National AccessAbility Week. • Events offered by the Canadian Innovation Centre for Mental Health in the Workplace are promoted on a monthly basis (e.g. Defying Stigma: Mental Health, Mental Illness and Workplace Accommodation). <p>More resources will be shared with employees as they become available.</p>
<p>As an additional resource for accessibility and persons with disabilities, the CRTC will create and staff an accessibility expert position by June 2023.</p>	<ul style="list-style-type: none"> • In May 2023, the office of the Secretary General hired an accessibility expert who is a member of the Deaf community and has lived experience of multiple disabilities. • Two additional persons with an accessibility and diversity lens have also been hired in the Secretary General's Office • The CRTC's Legal Sector has staffed the position of Senior Legal Counsel, Accessibility.

Measures to promote the hiring and retention of persons with disabilities

Accessibility Plan Action Step	Action Taken in 2023
<p>The CRTC will develop a corporate plan that addresses the changes to the <i>Public Service Employment Act</i> no later than one month of those changes coming into effect and will monitor its implementation while staying informed on accessibility resources available through central agencies.</p>	<p>Changes to the <i>Public Service Employment Act</i> aimed at addressing barriers in the staffing process came into effect on July 1st, 2023.</p> <ul style="list-style-type: none"> • The changes were implemented immediately through an action plan that included: <ul style="list-style-type: none"> ○ training sessions to staffing specialists; ○ information sessions for hiring managers from July to September 2023; ○ Analysis of assessment tools as they are used to ensure that there are no biases or obstacles. <p>Additional information sessions are scheduled for October and November 2023.</p>
<p>The CRTC will launch a call for proposals for an Employment System Review by March 2023 aimed at decreasing barriers in the hiring process.</p>	<p>The call for proposals has not yet taken place due to procurement backlog and unavailable funding. The process will resume in the next fiscal year.</p>
<p>The CRTC will include language to encourage hiring of persons with disabilities as an objective within the performance management agreements for all executives for the 2023-2024 fiscal year.</p>	<ul style="list-style-type: none"> • Every executive now has a commitment in their performance agreements to: <ul style="list-style-type: none"> ○ support the objectives and the implementation of the Accessibility Plan; and ○ improve the representation of persons with disabilities within their team at all levels.

Measures to improve the clarity of the process to request workplace accommodations

Accessibility Plan Action Step	Action Taken in 2023
<p>The CRTC will evaluate its policies with the goal of creating a more centralized and clearer approach to workplace accommodations and accessibility in consultation with employees with disabilities. To this end, procedures and guidelines, including roles and responsibilities and monitoring for the accommodations process will be developed no later than December 2023.</p>	<ul style="list-style-type: none"> • A working committee is being formed to review and centralize the accommodation process, with an accessibility expert leading the group. • We are also working on a new onboarding form to facilitate the workplace accommodations process. <p>The objective will not be reached by December 2023, but we are committing to making it a priority in the coming months.</p>
<p>The CRTC commits to making it clear that a medical note is no longer required to request the vast majority of workplace accommodations such as for ergonomics (e.g., furniture, keyboards, mice) and adaptive technology compatible with GOC systems (e.g., screen readers for blind employees, noise-cancelling headphones or software to accommodate neurodiverse employees, etc.). The CRTC commits to providing ergonomic evaluations and equipment to its employees' primary place of work.</p>	<ul style="list-style-type: none"> • A medical note is no longer required for most equipment-related workplace accommodations. <p>The CRTC will further review its policies to reflect the change and support its staff in the development of procedures and guidelines for a new, more streamlined accommodations process.</p>

Measures to improve the culture of meetings

Accessibility Plan Action Step	Action Taken in 2023
The CRTC will continue flexible work arrangement policies, to the extent possible.	<ul style="list-style-type: none"> The CRTC is offering flexible work arrangements, including telework, to the extent possible.
The CRTC will implement workplace norms that require standard meeting-free hours, breaks between meetings, and/or breaks during longer meetings. A reference guide will be created to support making meetings more accessible by June 2023. This will include a list of service providers who can offer meeting accommodations such as Communication Access Realtime Translation (CART) services, language interpretation services, etc.	<ul style="list-style-type: none"> American Sign Language (ASL) and Langue des signes québécoise (LSQ) interpretation services are provided in part by the Translation Bureau. A Best Practices for Conducting Hybrid Meetings job aid is available on CRTC's intranet page. A list of CART service providers has been populated with the help of the Employment and Social Development Canada IT Accessibility Office. <p>Our accessibility expert is currently collecting information to create a reference guide for accessible meetings that will include information on how to shorten appointments and meetings. It is now expected that the guide will launch in 2024.</p>

The built environment

This priority area will ensure that people entering the CRTC's offices, including employees and stakeholders with disabilities, have barrier-free access to full and equal participation in society, in the workplace, and in the regulatory process.

Measures to reduce the existing, persistent, environmental and physical barriers

Accessibility Plan Action Step	Action Taken in 2023
<p>In working with Public Services and Procurement Canada (PSPC) on the redesign of its offices, which will begin in winter 2023, the CRTC will take sensory factors and built environment barriers into account. While the renovations are taking place, the CRTC will ensure that the temporary swing space used by its employees also takes into account sensory factors and action accommodation requests in a timely manner.</p>	<ul style="list-style-type: none"> • Given the temporary nature of our current office space, we cannot make permanent modifications. • We have conducted a walk-through to identify barriers that may hinder the accessibility of people with disabilities. They will be considered when we move back into our permanent offices. • We addressed concerns related to bright lighting by creating dimly lit workspaces.
<p>The CRTC will continue to promote and support flexible work arrangements wherever possible.</p>	<ul style="list-style-type: none"> • We implemented a hybrid work arrangement that provides all employees with the necessary flexibility, whenever feasible. • <u>We also have a procedure for accommodation requests in place.</u>
<p>To help reduce the possibility of negative experiences for its employees, the CRTC will continually review the built environment to ensure that it meets all accessibility best practices. The CRTC will also proactively prioritize, plan and work with Public Services and Procurement Canada (PSPC) to improve the accessibility of its physical space beyond the minimum standard.</p>	<p>The CRTC is regularly meeting with PSPC, accessibility experts, and other consultants to identify, remove, and prevent physical and environmental barriers in our future workplace by implementing the latest accessibility standards.</p>

Information and communication technologies (ICT)

This priority area is focused on ensuring that the CRTC's internal and external technological tools are accessible. This will help employees and the public have barrier-free access to full and equal participation in society, regardless of their disabilities, and help persons with disabilities become involved in the development of the CRTC's regulatory policies.

Measures to improve the accessibility of the CRTC's internal network applications and its website

Accessibility Plan Action Step	Action Taken in 2023
The CRTC will create a centre of expertise for accessibility within its IT team and develop an inventory of existing inaccessible tools by 31 March 2024.	<ul style="list-style-type: none">The Accessibility Center of Expertise in the ICT team has been created and staffed. <p>An overall inventory of all inaccessible applications is in development.</p>
By 31 December 2024, the CRTC will develop a work plan to make inaccessible tools accessible.	<ul style="list-style-type: none">A short-term plan has been established to ensure that all internal and external web applications receive accessibility recommendations. <p>A work plan to make all inaccessible applications accessible will be developed once the overall inventory has been finalized.</p>
The CRTC will create a page on its internal website to hold information related to the accessibility features of various ICT tools and how employees can request accommodations related to these tools.	<p>Accessibility resources are being gathered to be posted on our internal website. An initial inventory of available tools was shared with employees during National AccessAbility Week 2023.</p>

Accessibility Plan Action Step	Action Taken in 2023
<p>The CRTC is currently in the process of redeveloping its internal sites and applications. The CRTC is committed to continuing this process. The CRTC has built-in accessibility testing at multiple stages of web development, which it is committed to maintain.</p> <p>This accessibility testing ensures that its website will be compliant with the new Standard on ICT Accessibility, which is currently being developed and will replace the Treasury Board's existing Standard on Web Accessibility.</p>	<ul style="list-style-type: none"> • A mandatory process has been implemented whereby the Accessibility Center of Expertise is engaged on all new development to ensure that it receives the necessary accessibility recommendations and validations. • Legacy sites and applications are reviewed by the Accessibility Center of Expertise when maintenance releases are performed, and accessibility improvement opportunities are included when possible, or documented for future implementation.
<p>In order to ensure that testing for accessibility is truly all-encompassing, the CRTC will leverage the new Accessibility Center of Expertise and reach out to other government departments to expand its knowledge of diverse types of disabilities. Further, the IT team will solicit volunteers among employees, specifically those with accessibility needs, to help with accessibility testing.</p>	<ul style="list-style-type: none"> • Guidance has been published and a process has been implemented which requires developers to have their applications validated by the Accessibility Center of Expertise. <p>In addition, the accessibility expert attended interdepartmental meetings regarding accessibility to stay up to date and understand better the reality of people with different types of disabilities.</p>
<p>The CRTC is currently updating its Application Support System, an internal file management program used by most employees.</p> <p>Accessibility considerations will be key in the design and implementation of the system and any other replacement systems.</p>	<p>The Application Support System will be included in the inventory of inaccessible systems and all updates will consider and address accessibility considerations.</p>

Accessibility Plan Action Step	Action Taken in 2023
<p>The CRTC will create an inventory of tools, resources, and training opportunities, such as training with the <u>Accessibility, Accommodation and Adaptive Computer Technology (AAACT) program</u>, and promote it to staff by March 2025.</p>	<ul style="list-style-type: none"> An initial inventory of available tools was gathered and shared with all employees during the May 2023 National AccessAbility Week, including sessions delivered by the AAAC. <p>Ongoing communications regarding new tools will be promoted as they are made available.</p>
<p>The CRTC now has built-in accessibility testing at multiple stages of web development, which it is committed to maintain. This accessibility testing ensures that the CRTC's public website will be compliant with the new Standard on ICT Accessibility. As various Web, creative and client services products are updated, the CRTC will take the opportunity to build-in accessibility through the exploration of new ways to test and consult on various accessibility needs.</p>	<ul style="list-style-type: none"> In May 2023, the CRTC launched an <u>Accessibility Hub</u> on its homepage, ensuring Canadians can more easily access CRTC accessibility regulatory information - minimizing the number of clicks for those navigating the CRTC's website for this information.

Communication, other than ICT

This priority area will help make sure that all persons are treated with dignity regardless of their disabilities, and that all persons have meaningful options and the freedom to make their own choices, with support if they desire, regardless of their disabilities. It will also ensure that CRTC decisions and policies take into account the disabilities of persons, the different ways that persons interact with their environments, and the multiple and intersecting forms of marginalization and discrimination faced by persons.

Measures to increase participation of persons with disabilities and remove barriers in CRTC proceedings

Accessibility Plan Action Step	Action Taken in 2023
<p>The CRTC will develop a plan for the creation of a discussion group of stakeholders connected to communities of persons with various disabilities. As part of this project, the CRTC will identify a list of potential stakeholders, and review potential mechanisms to compensate participants by 31 March 2024.</p>	<ul style="list-style-type: none"> • The CRTC hired new engagement resources in August 2023, with a mandate to engage disability communities. <ul style="list-style-type: none"> ○ They will be collaborating with policy analysis staff to share lessons learned and best practices. ○ Internal collaboration will be extended to the CRTC Communications staff and Legal staff. • We are monitoring the development of the Accessibility Exchange, which is a new platform that will connect people with disabilities to federally regulated entities. We intend to use the platform to ensure we engage with as broad an array of disability communities as possible. • The CRTC has engaged with the Canadian Human Rights Commission to understand how it developed its Policy on Stakeholder Compensation and to consider any best practices into account in the development of future CRTC Policy.

Accessibility Plan Action Step	Action Taken in 2023
<p>In regard to engagement, the CRTC will develop outreach strategies to promote awareness of the CRTC mandate by December 31, 2023. These outreach strategies will be geared at engaging groups reflecting various disabilities on upcoming or current major Commission proceedings.</p>	<ul style="list-style-type: none"> • The outreach strategies implemented by the Engagement Office to date include: <ul style="list-style-type: none"> ○ Sending emails to various groups representing persons with disabilities to encourage their participation in key CRTC consultations; and ○ Promoting videos in ASL and LSQ to facilitate their participation. <p>Further strategies are in development to promote upcoming consultations to persons with disabilities and related stakeholders.</p>
<p>In order to make consultation processes more accessible, the CRTC commits to make available a live and pre-recorded generic information session for the consultation process and pilot consultation-specific information sessions in plain language by 31 March 2024.</p>	<p>The CRTC is currently preparing an information session that will be used as our pilot project. The pilot is scheduled to take place in October 2023.</p>
<p>The CRTC is developing an Accessibility Accommodation policy. Its purpose is to make requests for accessibility accommodations by a member of the public in a Commission proceeding transparent and predictable. The new Accessibility Accommodation policy is anticipated to be finalized and published on the CRTC website in 2023, including in ASL and LSQ.</p>	<ul style="list-style-type: none"> • The guidelines for providing accessibility accommodations have been drafted. • Consultations on the draft were held with accessibility stakeholders in October 2023. <p>In order to incorporate the feedback received from the consultation into the final guidelines, they will have to be published in early 2024.</p>

Accessibility Plan Action Step	Action Taken in 2023
<p>The CRTC will develop a corporate-wide Gender-Based Analysis (GBA)+ guide by September 2023 to assist analysts in considering how diversity and intersectionality can be integrated in policy development as well as in the CRTC's engagement with Canadians.</p>	<ul style="list-style-type: none"> A draft of the CRTC "Evergreen" GBA+ tool was circulated for approval in August 2023 and finalized in September. The document is now being revised and translated. <p>It is anticipated that a final version of the guide will be available to employees of the CRTC before the end of the year. Its aim is to make CRTC proceedings more inclusive and diverse, to provide a holistic method for the assessment of systemic inequalities, and to assess how diverse groups may experience policies, programs and initiatives.</p>
<p>The CRTC will also create a checklist of requirements for public hearing spaces (i.e., spaces that the CRTC rents to hold its public hearings) that will be used as a tool to help ensure the accessibility of these spaces.</p>	<ul style="list-style-type: none"> The accessibility checklist was finalized in November 2022. <p>It will be continuously updated to comply with the latest accessibility requirements and advancements in technology.</p>

Measures to improve the organization's use of plain language

Accessibility Plan Action Step	Action Taken in 2023
<p>The CRTC will continue to monitor the work of <u>Accessible Standards Canada</u> towards the development of a Plain Language Standard. towards the development of a Plain Language Standard.</p>	<p>The CRTC will verify that all Decisions, Notices, and Orders published on their website are accessible to all Canadians while waiting for the implementation of the new Plain Language Standard.</p>
<p>The CRTC will offer its employees annual plain-writing workshops, beginning in the 2023-2024 fiscal year.</p>	<ul style="list-style-type: none"> • A plain language workshop was offered in late 2022. • In spring 2023, all employees received a resource titled "How to make Communications Accessible." <p>Additional resources on plain language will continue to be developed, and learning opportunities will continue to be shared with employees who create content intended for the public.</p>
<p>The CRTC will continue to ensure that plain language standards are incorporated into web communications and will use feedback processes to gather additional perspectives on accessibility.</p>	<ul style="list-style-type: none"> • Web content is created according to the Canada.ca Content Style Guide, which has plain language at its core. <p>The CRTC will continue to use a readability tool to check the reading level of English content, aiming for grade 8 level or below for content that is intended for a general audience.</p>

Measures to increase the amount of information provided in ASL and LSQ

Accessibility Plan Action Step	Action Taken in 2023
<p>The CRTC will create a centralized budget to facilitate the organization's contracting for services that increase accessibility. For example, to fund the production of more videos in ASL and LSQ, to hire interpreters, to provide CART services during meetings, and for other accessible services.</p>	<ul style="list-style-type: none"> • A centralized budget is in place under the Secretary General's Office for all accessibility-related needs, including ASL and LSQ interpretation, and CART services.
<p>Some of the CRTC's key consumer policies and information are already available in ASL and LSQ.</p> <p>As a further step, the CRTC intends to engage with communities whose first language is sign language to assess their priorities and needs. This feedback would then inform a future, measured approach to enhance the availability of content in ASL and LSQ.</p>	<ul style="list-style-type: none"> • We consulted with members of the Deaf community on how sign language content is presented on our website and made several changes. <ul style="list-style-type: none"> ○ We have begun to treat ASL and LSQ as standalone languages. Therefore, we have created unique ASL and LSQ buttons to make the content easier to locate. ○ We are working on a new search function and central repository to group all sign language content together.

The procurement of goods, services and facilities

This priority area will help make sure that all persons have barrier-free access to full and equal participation in society, regardless of their disabilities.

Measures to promote accessibility of goods, services and facilities procured by the CRTC

Accessibility Plan Action Step	Action Taken in 2023
In order to ensure digital technologies are accessible, the CRTC will clarify its understanding of the accessibility standards used by Shared Services Canada and build this information into its individual procurement strategies.	The process has begun. We are gathering resource materials to install, planning and developing a timetable of each part.
The CRTC will ensure that all procurement specialists are trained in all matters related to accessibility and look to other government agencies and departments for best practices on considerations related to procurement.	<ul style="list-style-type: none">• The Procurement team completed a session entitled “Procuring Accessible Information and Communication Technologies” in June 2023. <p>The team is actively looking for more training opportunities linked to accessibility.</p>
The CRTC will establish a contract with a new interpretation service provider by March 2023 to ensure that ASL and LSQ video production will continue. These services will be accessible by all sectors within the CRTC.	<ul style="list-style-type: none">• We have initiated the process and are currently:<ul style="list-style-type: none">○ Evaluating the organization's various needs to create a corporate contract for ASL/LSQ translation and interpretation; and○ Writing the statement of work. <p>In the meantime, we are contracting for sign language services on an as-needed basis.</p>

The design and delivery of programs and services

Because the CRTC operates at arm's length from the government, it does not administer government programs or provide government services. The CRTC interacts with the public in two main ways: through public proceedings and its client services support centre.

As these services are focused on communicating with Canadians, and use ICT tools, these action areas have been listed under Information and Communication Technologies and Communications, other than ICTs.

Transportation

The CRTC does not offer transportation services and therefore has nothing to report under this heading.

Areas designated under regulations

The Governor in Council can designate additional areas in which barriers are to be identified and prevented under section 5 of the Act. As of the writing of this report, it has not done so. If additional areas are designated in the future, the CRTC will address these in later accessibility plans and progress reports.

Other initiatives

We are implementing additional commitments that are not included in the 2023-2025 Accessibility Plan to improve the experience of people with disabilities.

Measures to improve disability, accessibility and mental-health awareness

Initiative	Action Taken in 2023
<p>Connecting and understanding the perspective of our colleagues with disabilities.</p>	<ul style="list-style-type: none"> • The CRTC sent one message per day to all employees during National AccessAbility Week to promote accessibility awareness. • A blog post written by an employee living with an invisible disability was shared with all employees. It touched on how the right accommodations can empower someone and play a big role in their well-being.
<p>Acknowledging the gap in knowledge and attitudinal barriers around mental health disabilities, cognitive disabilities and other invisible disabilities, including neurodiversity.</p>	<ul style="list-style-type: none"> • The Accessibility expert and Mental Health and Wellness teams meet monthly to bridge the accessibility and mental health gap by: <ul style="list-style-type: none"> ○ building awareness and developing a culture that protects psychological health; ○ putting a focus on empathic leadership; and ○ providing tools, training and resources that are inclusive to all disabilities. <p>Requesting support requires relationships built on trust to feel safe from the interview/onboarding process, all the way to the departure/retirement.</p>

Measures to improve the experience of people with disabilities in CRTC proceedings

Initiative	Action Taken in 2023
Measures to assist participants requiring accommodations during hearings.	<ul style="list-style-type: none">Changes in our web form for parties wishing to appear before the Commission to proactively ask whether they have accessibility requirements. <p>We continue to offer Live streaming with closed captioning for all public hearings.</p>

Consultations

To get input on the progress that we made on the implementation of our accessibility plan, we reached out to 15 organizations across Canada that advocate for people with a wide range of disabilities. Seven organizations responded and agreed to participate in the consultations. These organizations included those that represent people who are deaf or hard of hearing, people who are neurodivergent, and people with physical disabilities.

Number of organizations reached	Number of organizations who participated in the consultations
15	7

For these consultations, we retained the services of Left Turn Right Turn Inc. (LTRT). LTRT is a consulting firm with a department focusing on accessibility. Their employees, in addition to their own lived experience, have expertise in accessibility policy, leading practices, and disability law.

Consultation Format

We ran four virtual consultation sessions over the course of two weeks in October 2023 in both French and English. All sessions were conducted over the Microsoft Teams platform. Sign language interpretation and live captions were available at all sessions. Participants were also invited to share any other accessibility needs they had prior to the session.

Participants were given some pre-reading material ahead of each session, including a draft of the Progress Report, and were then asked to share their feedback through a series of questions. LTRT employees facilitated each session and took notes.

Input on the CRTC 2023-2025 Accessibility Plan

Some participants found the plan to:

- be difficult to understand for someone with a developmental or learning disability;
- lack measurable goals; and
- be unclear as to how the CRTC defines disability and whether it includes neurodivergent people and other invisible disabilities.

Input on the Progress Report

The pre-reading material included a short summary of initiatives and action steps in plain and simple language. Participants shared that they generally would have liked:

- more details about the initiatives;
- more information about the person who has been hired as an accessibility expert;
- to see more progress in disability and accessibility training; and
- to be informed about new accessibility initiatives.

Input on CRTC's Consultations Process

Some participants recommended that the CRTC:

- invest more energy in building relationships with a wider variety of advocacy organizations;
- give a longer window of time to prepare for the consultations;
- standardize its consultation practices; and
- compensate participants for the time and effort it took to prepare for and take part in the consultations.

Conclusion

These consultations provided us with first-hand knowledge of how our plan and report are perceived by persons with disabilities. It will help us reflect on what we can do to improve. We have taken note of these important recommendations and will continue to work actively on them.

We also received some positive feedback from people in the disability community:

- They were encouraged to see the use of more ASL/LSQ videos and that CRTC plans to increase the number of such available videos in the future.
- The Live Chat functionality of our feedback process was tested by a participant prior to the consultations. They were appreciative of the fact that they were able to reach a real person in under a minute and found this to be an effective way to communicate with the CRTC for people who are deaf.

As a new initiative to strengthen its connection with the disability community, the CRTC will be creating a mailing list that organizations can subscribe to if they wish to receive updates about CRTC's accessibility progress.

Feedback

The CRTC's feedback mechanism includes a mailing address, an email address, a telephone line, including Video Relay Service (VRS), an online webform and live chat, and a teletypewriter service for employees and members of the public to provide comments on any accessibility barriers that they may have encountered in dealing with the Commission or on how the CRTC is implementing its Accessibility Plan.

External feedback received	Internal feedback received
16 emails	2 emails

Since the inception of this mechanism, 16 interactions with members of the public through the accessible@crtc.gc.ca email address were recorded. None of these were in relation to the accessibility of the CRTC or its Accessibility Plan.

Members of the public often seek to communicate with the CRTC on various issues related to their communications services and other federal government files. In doing so, they often use the first means of getting in touch with us they can find on our website. Having a "no wrong door" policy, all the interactions received were forwarded to our Client Services team or to other agencies for action as appropriate.

Internally, 2 emails were received from the same intervenor pertaining to the accessibility and readability of our internal document management system. Those messages were relayed to our Accessibility Champion, who is also the Chief Information Officer for the organization. He tasked his team to investigate the issue, and the intervenor was contacted promptly with recommendations on how to improve the readability of the application as a short-term solution. A longer-term strategy related to the upgrade of the application was also put in place. No additional feedback was received through the other means of communication, including the phone line with VRS.

What we learned

Progress on accessibility and disability inclusion is not just a matter of meeting the requirements of the Act. This is an opportunity to create a diverse and inclusive work environment and regulatory agency where everyone can flourish and succeed in meeting the evolving needs of all Canadians.

Through the analysis of our data and insights derived from our consultations, we identified some key areas where we can focus our efforts to further remove barriers:

- **Improving the accessibility of our website**

We heard that our website could be improved upon, with pages that are less text-heavy, with short summaries in clear and simple language and more direct access to alternative content such as sign language videos.

- **Building awareness of disability in the workplace**

We heard that staff would benefit from more education around disabilities and accommodation to dismantle misconceptions and attitudinal barriers.

- **Improving workplace accommodation procedures**

We heard that our current process could be streamlined and simplified.

- **Hiring more people with disabilities**

We heard that disability representation is key, especially in management roles.

- **Sharing initiatives with the disability community**

We heard that the community would like to be informed about new accessibility features directly from us.

- **Being more detailed and ambitious with our accessibility plan**

We heard that we need to provide receipts and take more actions towards our plan objectives, rather than simply intending to do so.

Challenges

As we start moving in a more deliberate way to eliminate bias and systemic discrimination faced by equity-seeking groups, we encountered some challenges in the implementation of this plan.

While our sign language content continues to steadily increase, sign language interpreters and translators across the country are currently facing a huge surge in demand, attributed to a desire to better meet accessibility standards. Additionally, contracting for services on an as-needed basis can create delays. In the context of this new reality, we have started working towards securing a corporate contract that will significantly reduce the time, effort and resources required to procure the production of content in sign language. We are also being mindful of how we use these services to avoid putting unnecessary pressure on the system.

The way forward

The conversation on accessibility has been changing over the last year. We have moved from the question of what must be done to how to get it done. We are now starting to reflect on how we can do it even better and how to be more ambitious in our next plan. As a participant from our consultation said to us: “It’s better to be ambitious and miss a few targets than to avoid setting them from fear of failure.”

But we also know that all ambitious plans need small steps that are achievable on our busiest days, so we can keep making steady progress in prioritizing accessibility, eliminating obstacles, and moving towards a barrier-free Canada.

As we work on fostering a culture of accessibility, we acknowledge that the contribution of individuals with lived experiences of disability is the driving force behind our cultural change. At the CRTC, we welcome everyone’s perspective because accessibility isn’t one size fits all. Whether it’s through the feedback we get from the consultations with the

disability community, through our colleagues or our feedback process, we are always eager to learn and improve what we do for the benefit of all Canadians.

As we continue our work, we invite you to submit feedback, through our [feedback process](#) page, on our Accessibility Plan, Progress Report, or any barriers you encountered while dealing with the CRTC.