



Canadian Radio-television and
Telecommunications Commission

Conseil de la radiodiffusion et des
télécommunications canadiennes

Canada



The Canadian Radio-television and
Telecommunications Commission

ACCESSIBILITY PLAN

2023-2025



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The Canadian Radio-television and Telecommunications Commission accessibility plan 2023-2025

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General

Provide feedback, request an alternative format or contact us

If you wish to request the Canadian Radio-television and Telecommunications Commission's (CRTC) accessibility plan or the description of the feedback process in an alternative format, or provide feedback, the CRTC can be reached by:

Mail:

Accessibility Champion
CRTC, Ottawa, Ontario K1A 0N2

Telephone (including Video Relay Service):

1-877-249-2782 from Monday to Friday, 8:30 a.m. to noon and from 1:00 p.m. to 4:00 p.m.
Eastern Time
Calls from outside Canada: 819-997-0313

Email:

accessible@crtc.gc.ca

Online webform or live chat:

Live chat is available from Monday to Friday, 8:30 a.m. to noon and from 1:00 p.m. to 4:00 p.m. Eastern Time (may not be compatible with screen readers)

[Support Centre | CRTC](#)

Teletypewriter (TTY):

Type to our teletypewriter toll-free (in Canada): 1-877-909-2782
Type to our teletypewriter from outside of Canada: 819-994-0423

Message from the Chair

Today, I am proud to introduce the CRTC's first-ever Accessibility Plan for 2023-2025. This action plan sets out our commitment to improving the accessibility of the CRTC as an organization for both our employees and the Canadian public.

The CRTC has built on past efforts and our consultations to come up with a plan that aims to reduce, eliminate and prevent barriers to accessibility. Some of our successes include publishing our first Notice of Consultation in American Sign Language (ASL) and Langue des Signes Québécoise (LSQ) in 2013 and accepting our first sign-language video intervention that same year. Since then, many decisions and information bulletins have been published in ASL and LSQ and we have learned from our experiences to continually improve the accessibility of our processes.



Mr. Ian Scott
Chairman of the CRTC

As an organization, it is important that we make commitments that are meaningful to all Canadians. After consultations with our employees and key stakeholders regarding how to reduce barriers, I believe we've come up with a solid plan for the next three years.

Our plan outlines several commitments such as live streaming public hearings in English and French with closed captioning, continuing to commit to flexible work arrangements for employees and seeking new ways to engage with even more Canadians of all abilities.

We want to hear from those that face barriers and will welcome any input that can help us become a better organization for all Canadians. The CRTC's goal is to promote efforts to increase accessibility and inclusion in Canada.

We hope that this plan will improve the accessibility of the CRTC and highlight our institutional commitment to accessibility.

Ian Scott

Chairperson and Chief Executive Officer

Introduction

The CRTC is an administrative tribunal that operates at arm's length from the federal government. We regulate and supervise broadcasting and telecommunications in the public interest.

The CRTC recognizes the importance of communication services to Canadians. We are dedicated to putting Canadians at the centre of the communications system. The CRTC oversees over 2,000 broadcasters, including TV services, radio stations, and others that broadcast in Canada. We also regulate telecommunications service providers, such as Internet, telephone and mobile companies.

The [*Accessible Canada Act*](#) (the ACA) came into force in July 2019. Its goal is to benefit Canadians, especially those living with disabilities, by realizing a Canada that is free of barriers by 2040. The ACA has seven key principles. These include that all persons are to have barrier-free access to full and equal participation in society and that persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures. The key principles of the ACA are outlined in the appendix. As part of the ACA, the CRTC is required to publish an accessibility plan.

The CRTC continually works on identifying, removing and preventing accessibility barriers. For example, we have responded to issues raised by our stakeholders about matters like

our hearings and our document filing system. However, more can always be done. The CRTC is committed to removing all barriers and facilitating accessibility.

The ACA identifies eight priority areas, of which five are relevant to the CRTC. These priority areas are employment, the built environment, information and communications technologies (ICT), communications (other than ICT), and the procurement of goods, services and facilities.

This plan summarizes the accessibility barriers we have identified related to those priority areas. It also sets out how we intend to identify additional barriers, remove the barriers we have already identified, and prevent new barriers in these areas. It covers the first three years after the publication of the present plan.

Consultations

The CRTC engaged with nearly 100 individuals through various internal and external processes to develop our accessibility plan. These consultations helped us put the principles of the ACA into action, especially that laws, policies, programs, services and structures must take disabilities into account and involve the participation of persons with disabilities.

During the development of this plan, the CRTC 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. LTRT assisted the CRTC in its consultations with its employees and its external stakeholders. This helped to identify current and potential accessibility barriers and to build our plan to remove those barriers and prevent news ones.

Internal Consultations

The CRTC's employees have direct experience of the organization's internal practices, policies, structures and systems. This gives them insight into accessibility and barriers within the CRTC. They also often interact with external stakeholders and the public. This gives them insight into how these groups experience accessibility and barriers when dealing with the CRTC from the outside.

The CRTC began its consultations with its employees by interviewing subject matter experts for the ACA noted priority areas on barriers. We then conducted an anonymous and confidential employee survey. The subject matter expert interviews helped to understand the institutional knowledge the CRTC has about the current state of accessibility and barriers. This also helped identify work that has already been done.

The employee survey collected feedback from employees, including employees with disabilities, to understand their experience and barriers they may have experienced or know about. The employee survey was deployed at the end of July 2022 to all CRTC employees and Commissioners, which represents approximately 595 individuals including students and temporary and full-time employees. Out of the 89 respondents, 44% (39) identified as being a person living with a disability. The respondents were asked to identify the type of disability they have, with many selecting multiple disabilities. These disabilities identified included mental health, cognitive, chronic, physical, sensory, and communication disabilities.

Following the subject matter expert interviews and employee survey, a preliminary report of findings, identifying barriers and opportunities was developed by LTRT. To explore the validity of the findings as well as to shore up any information gaps that remained, the CRTC sought comments from its employees on the draft report through an anonymous web form in September 2022.

External Consultations

In order to consult with external stakeholders and Canadians, including persons with disabilities, we used [CRTC Conversations](#), an online engagement platform. We asked for comments on the current accessibility barriers as well as opportunities to remove those barriers. We also shared our preliminary report. Through this engagement platform, disability advocacy organizations and the public were invited to participate in three ways.

An invitation was sent to over 100 organizations involved in accessibility issues. Firstly, participants were invited to respond to an online survey that gathered information such as who interacts with the CRTC, in what capacity, the disabilities that these people may have, and the barriers they have encountered when interacting with the CRTC. Secondly, the CRTC sought feedback on the draft report on the CRTC's current accessibility barriers through a discussion board. Finally, participants were invited to virtual focus groups on the CRTC's accessibility plan in English and ASL and in French and LSQ in order to gather more detailed feedback. Communication Access Realtime Translation (CART) captioning, a service that provides real-time captioning, was also provided for the duration of the focus groups.

All phases of the consultation informed the CRTC on identifying accessibility barriers and next steps on how to remove them and prevent new ones. These barriers and next steps are detailed in the sections below.

Employment

Addressing employment-related barriers will help the CRTC act on the ACA's principles. In particular, it 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.

Current practices

While identifying employment barriers, the CRTC looked at its hiring process, onboarding processes, employee wellbeing (e.g. accommodations), and sensibility training.

The CRTC has been responsive to the needs of its employees as they arise. Managers often have a formal role in the accommodations process as they are often the first person to be approached by an employee. Accordingly, managers, the accommodation team and employees work together to build managerial knowledge and come up with practical solutions to barriers experienced by an employee.

The CRTC has also held soft skills training which, while not specific to accessibility, does give employees some of the skills needed to respond to accessibility issues. These include how to meet employees' needs and change management training.

Finally, the CRTC has developed and deployed an annual internal Introspect survey in order to gather information on employee views and satisfaction specific to the CRTC. This helps the CRTC refine its existing programs, processes and strategies and points to areas where gaps exist. Among other things, the Introspect survey increased the CRTC's knowledge and understanding of the percentage of its employees with disabilities. Moreover, the CRTC has not stopped at data collection and is now analyzing how this data can be used to improve accessibility in the organization.

Barriers and opportunities

Lack of knowledge and training

There is currently a lack of accessibility-specific training for all employees or resources for managers in implementing accommodations. Without building this knowledge, managers may be less successful in accommodating employees and removing barriers.

The employee survey that was deployed as the first phase of consultation highlighted the work needed to address accessibility concerns related to mental health disabilities, cognitive disabilities, other less visible disabilities and neurodiversity. The respondents to the employee survey stated a general lack of knowledge and information regarding these disabilities. This could lead to misperceptions about how to support persons with these types of disabilities, stigma around their abilities, and difficulty in creating policies that address these barriers.

Respondents pointed to instances where they faced negative attitudes or differential treatment for their mental health disability or their neurodiversity, both from colleagues and managers. In addition, accommodations may be more likely to be denied or questioned when it comes to these disabilities as they are less apparent and still misunderstood.

There is also a need for planned training for all employees around disability, ableism, stigma and accessibility. Full accessibility cannot be achieved without shifting institutional values, goals, culture and perceptions regarding disability.

Action steps

To respond to those barriers, the CRTC will identify introduction to accessibility training by March 2023.

Further, the CRTC will assess learning needs or gaps and develop an accessibility learning plan for all employees, managers, and functional specialists¹ by August 2023. This learning framework will:

- span the entire organization;
- be both broad (e.g., general accessibility principles and ableism training) and role-specific (e.g., manager training on types of accommodations);

¹ Functional specialists are defined as experts in a specific discipline. In the context of this plan, functional specialists refer to employees who work in a service area dealing directly with the public.

- be both built into the onboarding phase of a new employee and continuous throughout an employee's tenure; and
- build in a schedule of renewal and updating.

The training will pay particular attention to mental health disabilities, cognitive disabilities and neurodiversity. Priority areas for the training will be increasing awareness, decreasing stigma and best practices for accommodations. Mandatory accessibility training will be included in all staff learning plans for the 2023-2024 fiscal year and future years. As a result, 90% of employees and 100% of functional specialists will have completed the mandatory accessibility training by 31 March 2024.

The CRTC will further host two internal presentations per year, dedicated to exploring accessibility issues, beginning in the 2023-2024 fiscal year.

This accessibility training plan and presentations will ensure that a culture of accessibility is further built and maintained in the CRTC. It will reflect changing and improving accessibility standards, and reiterate the importance of accessibility in the eight areas of the ACA as these apply to the CRTC.

The CRTC will also continue to advertise courses by the Canada School of Public Service on accessibility and disability to its employees, while exploring other learning opportunities that may benefit the organization.

As an additional resource for accessibility and persons with disabilities, the CRTC will create and staff an accessibility expert position by June 2023.

The CRTC will also include language to encourage hiring of persons with disabilities from outside the public service as an objective within the performance management agreements for all executives for the 2023-2024 fiscal year.

Hiring process

There are gaps in terms of the CRTC's hiring and retention of persons with disabilities. External consultation participants noted that the CRTC needs to do more to attract people with disabilities, especially people who are Deaf. They noted that this would improve communication with Deaf people while also improving the knowledge base needed for regulating communications.

The employee survey also identified accessibility barriers in the CRTC's hiring processes, including the interview process, primarily when it comes to individuals with mental health disabilities or who are neurodiverse. Issues identified include time constraints, the format of questions, necessary testing, interviewers wearing perfumes, and interview processes that are rigid and anxiety-provoking.

The language used when communicating with applicants, for example in the job posting and post-application, may be another barrier.

Action steps

Key changes have been made to the [Public Service Employment Act](#). As part of the changes, a new definition of "equity-seeking groups" has been added. "Equity-seeking groups" is defined as a group of persons who are disadvantaged on the basis of one or more prohibited grounds of discrimination within the meaning of the [Canadian Human Rights Act](#). This definition includes the four designated groups under the [Employment Equity Act](#): women, Indigenous Peoples, persons with disabilities, and members of visible minority groups. It also includes groups not currently designated under this act, such as subgroups of visible minority groups and the 2SLGBTQI+ community.

Other changes to the [Public Service Employment Act](#) relate to biases and barriers that disadvantage members of equity-seeking groups in hiring processes. This includes evaluations of key assessment methods, such as interviews, reference checks and written exams, and evaluating if there are biases and barriers in qualification standards.

The CRTC will draft a corporate plan that responds to the new requirements of the [Public Service Employment Act](#) no later than one month following their coming into effect.

In order to further identify and remove barriers in the hiring process, the CRTC's HR Strategic Advisors will continually monitor and stay informed on accessibility resources available through central agencies as they become available.

Moreover, language will be included to encourage the hiring of persons with disabilities in the objectives of executive staff for the 2023-2024 fiscal year.

Finally, the CRTC will launch a call for proposals for an Employment System Review by March 2023.

Accommodation process

The accommodation process is clear to employees that have central responsibility for the process. But it may not be clear to employees with disabilities or their managers.

Many respondents to the employee survey with disabilities (74 %) reported encountering challenges in the accommodation process. These respondents reported having the necessity of accommodation questioned, challenging processes, and skepticism about what type of accommodation can and should be offered.

Furthermore, during the accommodation process, the CRTC may require third-party documentation from the requesting individual, such as a medical letter. Requesting documentation to support accommodation requests is in line with current norms and legal requirements. However, it is also complicated and frustrating for persons with disabilities and creates significant barriers.

Action steps

The CRTC will re-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 by December 2023.

The CRTC further commits to making clear that a medical note is no longer required to request the vast majority of workplace accommodations, such as for ergonomics (furniture, keyboards, mice) and adaptive technology compatible with Government of Canada systems (screen readers, noise-cancelling headphones or software to accommodate neurodiverse employees).

To support and account for the move to hybrid work, the CRTC commits to providing ergonomic evaluations and equipment to its employees' primary place of work. In exceptional circumstances where multiple or complex requirements exist and the confirmation of an effective accommodation, or combination of accommodation measures, would benefit from expert advice, consultation with Government of Canada accommodations experts (such as the Accessibility Accommodation and Adaptive Computer Technology) or documentation from a medical provider may be requested. This policy will be fully implemented by June 2023, and will include an explanation of the steps required to request an accommodation on the CRTC's intranet.

Workplace culture

According to some survey respondents, the culture of meetings and time pressures pose barriers. In particular, work that requires employees to sit at a computer all day, move from one meeting to another and participate in large meetings were identified as potential barriers. Long hours for managers and directors were also stated as a barrier for people with disabilities.

Many of the survey respondents indicated that continuing and further extending flexible work arrangement policies would support their needs and ensure greater accessibility at the CRTC.

Action step

The CRTC will continue flexible work arrangement policies, to the extent possible, and implement workplace norms that include standard meeting-free hours, breaks between meetings, and/or breaks during longer meetings.

In regard to 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 accommodations such as CART services and interpretation services.

The built environment

Addressing built-environment-related barriers will help the CRTC address the ACA's principles. In particular, it 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, and in the regulatory process.

Current practices

While identifying built environment barriers, the CRTC looked at its office and hearing spaces and the hybrid work environment.

The CRTC is currently in the midst of renovating its headquarters. Part of these upgrades will include a more accessible workplace and all workstations will be adjustable and ergonomic. The CRTC is committed to identifying and addressing accessibility concerns in the temporary space it will occupy later this year, while the renovations are being completed, and into any future long-term space it will occupy.

Barriers and opportunities

Known accessibility issues

The CRTC has taken steps to address environmental and sensory issues such as using light dimmers and increasing awareness about scents. However, built environment issues were brought up through the different phases of consultations, especially environmental considerations. Respondents to the employee survey indicated that scents, such as perfumes and cleaning products, are an ongoing issue even as the CRTC has raised awareness on this issue. Respondents also highlighted sharp, fluorescent lighting as a barrier they have encountered. Some respondents stated that they found it difficult to receive accommodations for this.

Furthermore, concerns surrounding the inaccessibility of open office floor plans were raised as it impacts the ability of employees to concentrate and work.

Other built environment accessibility issues were small or cramped spaces that do not have adequate space for mobility devices or service animals, lack of automatic door openers, no visual emergency announcements and no quiet or sensory rooms.

Action steps

The CRTC will evaluate structures and policies when it comes to the built environment to determine how it could remove and prevent barriers. Specifically, the CRTC will take into account sensory factors and built environment barriers and work with [Public Services and Procurement Canada](#) (PSPC) on the redesign of its offices that will begin in winter 2023.

While the renovations are taking place, the CRTC will ensure that its temporary workspace also takes into account sensory factors and will action accommodation requests in a timely manner.

The CRTC will also continue to promote flexible work arrangements wherever possible.

Complying to standards and responding to requests

Given that the CRTC is a tenant in its office building, it does not have full control of its built environment. Nonetheless, the CRTC is responsible for the accessibility of its space and for identifying accessibility barriers, addressing what it can address and advocating for changes it cannot address itself.

While the CRTC is in compliance with current applicable standards, these are typically a minimum requirement and not reflective of full accessibility.

Currently, accessibility needs related to the built environment that go beyond these standards are addressed on a reactive, as necessary basis. This means that the CRTC is relying on individuals to identify accessibility concerns related to its built environment.

Action step

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 PSPC to improve the accessibility of its physical space beyond the minimum standard.

Information and communication technologies

Addressing ICT-related barriers will help the CRTC act on the ACA's principles. In particular, ensuring that the CRTC's internal and external technological tools are accessible 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.

Current practices

The CRTC looked at its internal and external websites, applications and key internal systems when identifying information and communication technologies (ICT) barriers.

The CRTC's Information technologies (IT) team has implemented many processes and policies that have improved accessibility. For example, when the CRTC develops and deploys new IT systems, accessibility considerations are built at all stages of the process. This ensures that there will be fewer barriers that users experience and it also means that fewer adjustments need to be made later on to render the system more accessible once deployed.

The CRTC has also built in internal IT procurement standards and processes to improve on aspects which it can control. The CRTC has adopted accessibility standards such as accessibility standards for Government of Canada websites and accessibility evaluation tools (WAVE and Achecker) that it is committed to maintaining. In addition, the CRTC allows employees to download apps to meet their needs without having to go through approval, and tests internal and external tools and sites for accessibility using automatic and manual processes.

Barriers and opportunities

Internal website, systems and tools

While the CRTC has worked towards greater accessibility, its internal website and applications contain features that are older and are not accessible, such as the Application Support System, a web-based application we use to manage broadcasting and telecom applications, including documents and interventions received from the public. The CRTC is aware of the gap and we have already taken some steps toward making greater accessibility, but there is still more work to be done.

During the consultation phase, employees highlighted accessibility barriers with some of the other systems and tools that are available to them, which are not easy to use or customizable to their needs.

Furthermore, the process to request ICT-related accommodations is not clearly defined for both the employees and the IT staff. This lack of clarity can delay or prevent implementation of accessibility measures that are may already exist in our IT systems.

Action steps

The CRTC is committed to address the accessibility gaps in current technological systems and tools. As such, the CRTC will create a centre of expertise for accessibility within its IT group and develop an inventory of existing inaccessible tools by 31 March 2024. By 31 December 2024, the CRTC will develop a work plan to make inaccessible tools accessible.

To ensure accessibility testing is truly all-encompassing, the CRTC will leverage the new centre 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 to help with accessibility testing.

The CRTC is currently in the process of redeveloping and migrating the internal sites and applications. The CRTC is committed to continuing this process. Moreover, the CRTC will maintain accessibility testing for internal IT systems to ensure that systems and web developments are in line with the requirements of the new Standard on ICT Accessibility, which is currently being developed and will replace Treasury Board's existing Standard on Web Accessibility.

The CRTC is currently reviewing the Application Support System. Accessibility considerations will be key in the design and implementation of any replacement systems.

Furthermore, the CRTC will create a page on its internal website for information related to the accessibility features of various ICT tools and how employees can request accommodations related to these tools.

Finally, the CRTC will create an inventory of tools, resources, and training opportunities, such as training with the [Accessibility, Accommodation and Adaptive Computer Technology program](#), and promote it to functional staff and front-line providers by March 2025.

External website

Website accessibility extends beyond specific technical requirements regarding compatibility with screen reading software. It can include an individual's ability to easily maneuver through the site to find the information they need. While the CRTC has done accessibility testing through both the development and deployment phase of its website, consultations found that users still report some difficulty navigating and using the website and its elements.

Action steps

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 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.

Communication, other than ICT

Addressing communication-related barriers will help the CRTC act on the ACA's principles. In particular, it 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.

Current practices

There are two main ways that the CRTC interacts with the public.

The CRTC holds public proceedings to support its regulatory activities. Proceedings have many forms, including public hearings. Proceedings may involve the CRTC communicating with members of the public in person, virtually, or in writing.

The CRTC also has a client services support centre that Canadians can contact to ask questions, make complaints, or leave feedback. Members of the public, including persons with disabilities, can contact client services to receive information on a range of issues related to the broadcasting and telecommunications services that the CRTC regulates.

To this effect, the CRTC ensures that hearings are as accessible as possible. Among other things, the CRTC will generally consider what accessibility features are available in hearing areas, and what alternative formats of documentation should be provided. The CRTC provides information, including hearing transcripts promptly and in screen-read-compatible formats. Access to hearing areas for service animals can also be provided, and hearing participants can request additional accommodations during the hearings process.

Further, the CRTC has committed to live stream its hearings with CART.

You can get more information about accommodations in CRTC proceedings by sending an email to hearing@crtc.gc.ca. The manner in which the CRTC communicates with individuals will take their specific needs into account as much as possible.

In regard to client services, the CRTC has digitized its TTY system, resulting in the ability to receive TTY messages on any computer, not only on TTY machines. This enables the CRTC's client service employees to respond to clients faster.

The CRTC has also implemented training on disability awareness with a specific module on Deaf culture to its front-line staff and to its Commissioners.

The CRTC also assessed the ways people can interact with the CRTC and access information. For example, we reviewed our external website, social media platforms, documents (both public-facing and internal, and in alternative formats), and videos to see what improvements to accessibility could be made.

As a result, we have taken concrete steps to improve accessibility. For example, the CRTC's website now includes an online form that allows visitors to submit accessibility concerns. If their concerns fall outside the CRTC's area of responsibility, the CRTC ensures a seamless handoff process in connecting these individuals with the right agency. This "no wrong door" approach reduces confusion and bureaucratic red tape, and makes for a simpler process for the individual.

Barriers and opportunities

Participation of people with disabilities in CRTC proceedings

The CRTC promotes the participation of persons with disabilities in hearings and other proceedings. However, there is room for improvement. Broader outreach, in terms of communicating what the CRTC does and how its proceedings work, could increase the participation of persons with disabilities. This could bring more diverse perspectives to the CRTC's attention and would help CRTC decisions be more reflective of Canadian society.

In addition to more general outreach, the CRTC is also aware of a specific need to expand its efforts to consult persons with cognitive and intellectual disabilities, who have not been well represented in CRTC proceedings in the past.

During the external consultation phase, Deaf stakeholders also noted that communication with the CRTC frequently takes place via email. These stakeholders considered the inability to communicate directly in sign languages to be a significant barrier to meaningful engagement with the CRTC.

Action steps

The CRTC will develop a plan for 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 how it can promote the participation of these participants by 31 March 2024.

The CRTC will also develop outreach strategies to promote greater awareness of what the CRTC does and how its proceedings work by 31 December 2023. These outreach strategies will be geared at engaging groups reflecting various disabilities on upcoming or current major CRTC proceedings.

In order to make CRTC proceedings more accessible, we also commit to making available a live and pre-recorded general information session and to pilot consultation-specific information sessions in plain language by 31 March 2024.

The CRTC is developing an information document that explains its accommodation and accessibility practices in its proceedings. Its purpose is to make the process for accessibility and accommodations requests by a member of the public transparent and predictable. This document should be finalized and published on the CRTC's website in 2023, including in ASL and LSQ.

The CRTC will also implement a Gender-Based Analysis+ guide in 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.

Plain language

The CRTC has reviewed its decision, notice and order templates for plain language. We have also used the Flesch-Kincaid scale to measure the readability of the English transcripts used for ASL and LSQ videos. Moreover, web content aims to meet the [Canada.ca Content Style Guide](#). Content intended for general audiences aim for grade eight reading level while consultation profile pages aim for grade six to eight reading level. However, despite these efforts, complexity of language remains an accessibility barrier, partly because of jargon.

Action steps

The CRTC will continue to monitor the work of [Accessible Standards Canada](#) towards the development of a Plain Language Standard.

Moreover, the CRTC will offer its employees annual plain-writing workshops, beginning in the 2023-2024 fiscal year.

Finally, the CRTC will continue to ensure that plain language standards are incorporated into web communications and employing feedback processes to gather additional perspectives on accessibility.

Sign-language interpretation

The CRTC is committed to providing as much information as possible to the public in sign language. It ensures that ASL and LSQ interpretation is proactively provided at hearings that focus on accessibility-related services (for example the Video Relay Service hearings). For other hearings, participants can make specific requests.

Currently, the CRTC uses an external service provider for the production of ASL and LSQ videos. However, this service provider will no longer offer these services, which affects the CRTC's ability to provide more information in these languages.

Participants in the external consultation noted that the CRTC does not have decisions, orders, forms, templates, or other frequently accessed pages posted in sign languages (ASL, LSQ and Indigenous Sign Languages). This presents a significant barrier to Deaf individuals who would like to engage with the CRTC.

Further, consultation participants took issue with the timelines for sign-language submissions to the CRTC's proceedings. In their view, these are too short and amount to a barrier given the substantial time commitment required for the production of ASL and LSQ videos.

Action steps

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.

The CRTC has created a centralized budget to facilitate the organization's contracting for services that increase accessibility for its stakeholders. For example, to fund the production of more videos in ASL and LSQ, to hire interpreters, to provide CART services during meetings, and other accessible services.

Some of the CRTC's key consumer policies and information are already available in ASL and LSQ. As a first 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 enhancing the availability of content in ASL and LSQ.

Accessibility of documents

The CRTC is working to ensure that the documents submitted by parties in CRTC proceedings are in accessible formats. Currently, parties are encouraged to submit documents in accessible formats. We have provided guidance on how to do that, and a

person with a disability can request an accessible format of a party's document if none exists. While this helps address the communications needs of people with disabilities, there are ways in which it can be strengthened. For instance, the need to make a request in some cases could lead to a lack of consistency.

The procurement of goods, services and facilities

Addressing procurement-based barriers will help the CRTC act on the ACA's principles. In particular, it will help make sure that all persons have a barrier-free access to full an equal participation in society, regardless of their disabilities.

Barriers and opportunities

The CRTC currently relies on Shared Services Canada (SSC) for the procurement of digital technology and therefore, relies on the SSC's accessibility checks.

Presently, the CRTC does not consistently review the Accessibility Conformance Reports of procured software or have the expertise to do so. As a result, the CRTC may be procuring goods and services that do not incorporate accessibility.

When the CRTC rents space for its public hearings that are not managed by the Government of Canada, it must ensure that the space is accessible. Currently, there is no established formal checklist of requirements for employees to refer to when searching for rental space. This could create potential barriers to accessibility if items are missed.

Action steps

In order to ensure digital technologies are accessible, the CRTC will clarify its understanding of the accessibility standards used by SSC and build this information into its individual procurement strategies.

The CRTC will ensure that all procurement specialists are trained in accessibility and look to other departments for best practices on considerations related to procurement.

The CRTC will also create a checklist of requirements for public hearing spaces that will be used as a tool to help ensure the accessibility of these spaces.

The design and delivery of programs and services

The CRTC is an administrative tribunal that Parliament has given the responsibility of regulating broadcasting and telecommunications in the public interest. 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 focussed on communicating with Canadians, these barriers and action areas have been listed under [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 made under paragraph 117(1)(b)

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

Conclusion

This accessibility plan identifies successes, barriers, and next steps to remove those barriers and prevent new ones based on the feedback received through the internal and external consultation phases.

The CRTC is committed to the implementation of this plan for the first three-year cycle which will provide a solid foundation toward a fully accessible Canada by 2040.

APPENDIX – The Principles of the ACA

The Principles of the ACA are set out at [section 6](#) of that Act. They are:

- (a) all persons must be treated with dignity regardless of their disabilities;
- (b) all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities;
- (c) all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- (d) all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- (e) laws, policies, programs, services and structures must 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;
- (f) persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
- (g) the development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

The CRTC took these principles into account in preparing its accessibility plan. We explain how we took them into account by listing the principles that are most relevant to different parts of the plan.