Canadian Heritage (PCH) Accessibility Progress and Feedback Report 2023

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Table of Contents

General - Provide feedback or contact us

For more information, to get a description of our feedback process or to request alternate formats of PCH's Accessibility Plan or Progress Report (i.e. large print, Braille, or audio), you can contact:

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Free Video Relay Service (VRS Canada) or TTY at 1-888-997-3123 (for people who are deaf, hard of hearing or speech impaired)

You can also provide feedback on PCH Accessibility Plan or barriers that you have encountered within PCH online or through our Accessibility Feedback Mechanism.

Canadian Heritage at a glance

Our department and its portfolio organizations play a vital role in the cultural, civic, and economic life of Canadians. Arts, culture, and heritage contribute more than $57 billion to the Canadian economy. They represent more than 670,000 jobs in sectors such as

cultural industries, the arts, sports, official languages, Indigenous languages, diversity and inclusion, as well as youth.

Introduction

We are pleased to present you our 2023 Accessibility Progress and Feedback Report summarizing efforts in implementing our [Accessibility Plan 2023-2025](#)**.**

People with disabilities represent one of the largest marginalized groups in the world. In Canada alone, 6.2 million Canadians live with disabilities, meaning any physical, mental, intellectual, cognitive, learning, communication or sensory impairment or functional limitation - whether permanent, temporary or episodic in nature, evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society[1].

Disability is part of all our experiences. It is the essence of diversity, a universal condition that flows across other identity factors such as race, ethnicity, gender, religion, age, socio-economic status, and sexual orientation. It is the one community that anyone of us can join at any time. The goal of the PCH Accessibility Plan is to foster cultural change towards an inclusive Canada that celebrates the diversity, creativity and contributions of persons with disabilities.

Released in December 2022, our Accessibility Plan and Feedback Mechanism are guided by the principles of demonstrating federal leadership, empowering communities, building awareness and changing attitudes in compliance with the *Accessible Canada Act* (ACA).

The plan is ambitious and includes 131 actions to identify, remove and prevent barriers in disability inclusion through seven pillars:

1. Employment: Recruitment, retention, and promotion of persons with disabilities
2. Built environment
3. Information and communications technologies (ICT)
4. Communications
5. Procurement
6. Design and delivery of accessible programs and services
7. Culture change toward disability inclusion

Over the last year, the PCH Accessibility Office engaged regularly with our pillar leads for each priority area to:

- track our progress toward implementation of the PCH Accessibility Plan
- identify and address new barriers emerging through the Feedback Mechanism and within the context of our continuously evolving environment; and

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[1] [Accessible Canada Act](#)

- validate how we were bringing an intersectionality lens to our work.

This report details our progress to date and identifies areas where there continues to be work required to remove barriers in our practices towards achieving inclusion for persons with disabilities.

We are pleased to report that the department is making good progress overall. Over the last year, we have taken foundational steps under each pillar towards identifying, removing and preventing barriers for employees with disabilities and for the Canadians we serve.

In particular, we have seen some important cultural and transformational shifts:

- Accessibility is a part of PCH's Hybrid by Design approach.
- Accessibility is now a priority embedded in PCH integrated business planning.
- Accessibility is now part of the conversation at PCH at all levels of the organization.
- PCH has a Workplace Well-Being Tiger Team on Accessibility. [2]
- We are fostering an inclusive Culture of Care in which employees:
    - hold a high awareness and understanding of accessibility and why it matters;
    - value diversity of perspectives and experiences;
    - promote a human-centred approach focused on building relationships of trust.
- In October 2023, PCH launched a new office dedicated to Inclusion, Diversity, Equity and Accessibility (IDEA), representing a significant effort to alter the department's culture.

Moving forward, adjustments to the PCH Accessibility Plan are being proposed to add two new pillars:

1. **Harassment, Violence Prevention and Resolution:** to raise the profile of the higher rates of harassment, discrimination and violence faced by persons with disability and accelerate a sustained commitment to their prevention and resolution
2. **Transportation:** to broaden the scope of this pillar and more fully address accessibility barriers when employees travel for work-related purposes.

Progress in implementing PCH's Accessibility Plan
Consultations (Who, how, when and where we consulted)

As part of the Accessible Canada Act, departments need to create transparent consultation and feedback processes for employees and clients with disabilities to address concerns faced through their lived experience. Guidelines have been created for engagement with key IDEA stakeholders, including organizations representing persons with disabilities.

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[2] Canadian Heritage Accessibility Plan 2023-2025

The PCH Accessibility Office continues to engage with equity-deserving employee networks representing Black, Indigenous, and other racialized communities, as well as religious communities and those who identify as 2SLGBTQI+ to gain a deeper understanding of the experiences of people with disabilities who belong to these communities. We also continue to work closely in collaboration with the Advisory Committee on (Dis) Ability (ACD) and to respond to the results from engagements held in the development of the Accessibility Plan.

In 2023, PCH concluded an External Benchmarking Study, developed through the Office of the Chief Audit Executive, to compare approaches for measuring and implementing disability inclusion provincially, federally and internationally. This study follows on the gap analysis completed in Spring 2022 to guide the PCH Accessibility Plan. Its goal is integrating best practices and lessons learned in implementation approaches.

Most Advanced Pillars

Pillar: Information and Communication Technology (ICTs)

Persons with disabilities continue to face significant challenges to accessing and to using ICTs. Our goal is to ensure our systems and equipment are accessible. Our Chief Information Officer Branch (CIOB) has been proactive in providing direct support to employees with disabilities and in tackling broader ICT challenges. Some examples of achievements in 2023 include:

Direct Support to Employees
- Established a 15-day working standard to obtain assistive technologies and ensure ongoing technical support.
- Reviewed systems, services, software, websites and equipment and created a plan to address shortfalls.
- Provided guidance to clients and administrative offices on how to incorporate accessibility clauses when buying adaptive technologies and monitor any remaining accessibility issues.
- Consulted with employees with disabilities to identify how CIOB services and ICTs could be made more accessible.

Broader ICT Accessibility Challenges
- Worked with Microsoft since July 2022 to improve the accessibility of its systems and software. CIOB reported accessibility issues on SharePoint sites, with Microsoft lists and forms, Microsoft Word and Sway. Microsoft has been very responsive to the flagging of these issues and has since corrected a third of the concerns.
- Taking part in the Central Accessibility Conformance Reports Shared Repository pilot, a platform where authorized experts share accessibility conformance reports.

- Ensured accessibility is a key consideration in the life-cycle management of PCH systems, like our internal Grants and Contributions Information Management System (GCIMS), and particularly any new ICT.
- Advanced priorities set by the Treasury Board Secretariat (TBS) to ensure that systems are compatible across the public service.

Pillar: Addressing Procurement Barriers to Accessibility

The PCH Procurement Office has modernized PCH procurement practices for goods, services and facilities to ensure accessibility requirements are woven into its various processes from the onset. Some examples of achievements in 2023 include:
- Trained procurement officers and Resource Management Directorates on accessibility so that they can advise Project & Technical Authorities of their obligations.
- Updated tools and templates to ensure that Accessibility requirements are considered in any procurement process.
- Ongoing collaboration with the Public Services and Procurement Canada's (PSPC) Accessible Procurement Resource Centre (APRC), to keep PCH procurement stakeholders aware of emerging accessibility standards and best practices as they become available.

Pillars Making Good Progress

Pillar: Built Environment

As part of the GC Workplace initiative, PSPC is committed to making workplaces more accessible and inclusive. While some buildings in the regions meet this standard, three floors of the Les Terrasses de la Chaudière complex (LTDLC) are being upgraded to create a healthy and sustainable work environment. These renovated floors have been designed with the needs of people with disabilities in mind.

Along with HQ modernization, other examples of achievements in 2023 include:
- Collaborating with the City of Gatineau, Brookfield Global Integrated Solutions and PSPC to address barriers such as sidewalk repairs, snow and ice removal and the addition of clearly marked accessibility drop-off points at all entrances.
- Working with various partners, such as the Bob Fern Centre and Occupational Health and Safety to provide accommodations which address concerns on the return to work in a hybrid environment.
- Piloting of GC Coworking sites where accessibility is being promoted.
- Creating an inventory of accommodation requests to better plan for the future.

Pillar: Communications, other than ICTs

As communication barriers were among the most pressing concerns identified in internal consultations, the Communications Branch is working closely with the PCH Accessibility Office in devising strategies to promote understanding of disability issues and why they matter. Fostering an organizational culture of disability inclusion requires a sustained effort to:

- Eradicate myths and attitudinal barriers including stigma, bias and judgement.
- Promote greater competencies and confidence in understanding the challenges faced by people living with disabilities.
- Render internal and external facing communications accessible to all abilities.
- Create accessible, inclusive content and distribute it in many alternate formats.

Example of achievements in 2023 include:

- Helped increase awareness of the PCH Accessibility Plan so that everyone recognizes that they have a role to play in achieving its implementation.
- Ensured that persons with disabilities are reflected in communications activities in a manner that is respectful rather than prejudicial, or that reinforces misconceptions and stereotypes.
- Set new standards to ensure events offer closed captioning, American Sign Language (ASL) and Langue des signes québécoise (LSQ) and Communication Accessible Real-time Translation (CART) services.
- Reviewed guidelines on producing accessible documents, in plain language, in alignment with standards set by Accessible Standards Canada.
- Established an interdepartmental Communications Community of Practice to build partnerships and share best practices across the GC and with stakeholders
- In the area of web communications:
  - Tracked comments and complaints related to web accessibility; and
  - Created an accessibility framework for employee-facing web content to align with upcoming GCWeb and Web Content Accessibility Guidelines (WCAG).

Pillar: Culture

Diversity is recognized as a fact of Canada, but inclusion is a choice. We seek to embed the aspirations of people with disabilities into our workplace organizational culture and ensure that their dignity and rights are respected and that they feel valued. Achieving this goal will require significant culture change.

Ableist mindsets need to shift from the deficit/ burden/ charity/ medical model of disability to the social model of disability so that persons with disabilities:

- can find enabling environments to participate on an equal basis with others; and
- are viewed as contributors to Canada's socio-economic and cultural fabric.

The PCH Accessibility Office has been fostering change and an inclusive culture of care through ongoing engagement with the ACD and other equity-deserving employee networks to ensure their lived experience is understood in an environment where inclusion means more than providing accommodations and invisible disabilities are recognized as real disabilities. Trust and belonging remain critical issues as employees with disabilities do not feel comfortable sharing their lived experience fearing reprisal.

Some examples of achievements in 2023 include:

- Developed mandatory training for 2023-24 for managers and employees towards building cultural competencies and a culture of care for the successful mainstreaming of disability perspectives into our work.
- Delivered experiential learning.
- Published a monthly newsletter, weekly accessibility tips and resources to support employees with disabilities.
- Supported Ombud's in applying disability into well-being action plans, training on mental health, activities to reduce stigma and build resilience.
- Delivered awareness events with positive images of persons with disabilities, including International Day of Persons with Disabilities, National AccessAbility Week, National Disability Employment Month, Red Shirt Day, Purple light.
- Created an Accessibility Allies network to help employees support one another.
- Supported new Deputy Minister Award in Accessibility.

Areas Under Development
The following pillars will be given priority in 2023-24 and going forward.

Pillar: Employment
Priority 1: Return to the Workplace and the GC Workplace Accessibility Passport
Since September 2022, return to the workplace in a hybrid work model has proved challenging in terms of accommodating employees with disabilities. Over the past 18 months, it has been the most frequently raised issue with the PCH Accessibility Office and with Human Resources (HR). PCH supported employees by:

- Establishing a Hybrid by Design Deputy Minister-led Committee.
- Setting up a working group with all partners involved in the implementation of accommodation policies to facilitate the coordination of work and the search for innovative solutions.
- Strengthening the Bob Fern Centre, a one-stop-shop for return to workplace accommodations, working with a Centralized Accommodation Fund, and in partnership with all corporate areas to address the large volume of requests.
- Satisfaction surveys and better tracking to lessen delays in addressing requests.
- Implementing the GC Workplace Accessibility Passport (GC Passport).

Recruitment and Representation
While PCH is working to improve the recruitment, retention, and promotion of people

with disabilities through employment policies and practices that are inclusive in nature, PCH has not yet met its Workforce Availability Target (WFA) for people with disabilities and its hiring of employees in support of the GC commitment to hire 5000 new persons with disabilities to the public service by 2025. PCH's goal is to hire 61 new employees by 2025. As of March 2023, we have reached 41% of our target with 25 new hires.

In March 2023, there was a significant gap between our workforce representation of employees with disabilities (7.4%) and their WFA (9.3%). Hiring and retention trends show that this will worsen without focused efforts.

The ACD released its *Barriers to Employment Study* conducted jointly with Statistics Canada's disability employee network and dialogue was begun with HR to better understand the needs of employees with disabilities for career progression and in the return to the physical workplace. Action continues to be taken through:

- Training to managers and staffing advisors on inclusive hiring practices for a diverse workforce and on how to render job postings and job offers accessible.
- Public Service Commission's new orientations for barrier-free candidate assessment and monitoring candidate demographics throughout recruitment processes to identify potential barriers and ways to mitigate them.
- Dashboards to make disaggregated data on representation as simple as possible, and better targeting to hire persons with disabilities.
- Better tracking tools to capture response rates to HR annual self-identification promotion campaigns.
- PCH saw a steady increase in representation between March 2022 and March 2023:
  - The proportion of employees with disabilities increased from 6.1% to 7.4%
  - The proportion of managers with disabilities increased from 6.3% to 9.1%.

Future self-identification campaigns will emphasize the broader ACA definition of disability and will track whether greater representation of persons with disabilities at PCH is a result of our recruitment and retention efforts or of greater self-identification.

While targeting for equity in representation, we are also working to provide welcoming environments that attract IDEA communities to PCH and inspire them to stay.

Harassment and Violence Prevention and Resolution (HVPR)
Our PCH Accessibility Plan recognizes the higher rates of discrimination and harassment against employees with disabilities as compared to their counterparts. Our goals are to:

- Prevent incidents of harassment, discrimination and violence from occurring.
- Respond effectively to these incidents when they do occur.
- Support affected employees in the resolution process.
- Ensure more robust accountability.

In April 2023, HVPR was transferred from HR to the Office of Ombuds and Well-Being (OOWE). By bringing these teams together, PCH can provide a centralized safe space where employees can seek support when facing disrespectful behaviours, harassment, discrimination and violence. Guided by an intersectionality approach that acknowledges systemic discrimination, some actions undertaken by the HPVR include:

- Developing a policy of zero-tolerance for micro-aggressions, harassment, and discrimination and revamping emergency procedures to include these issues.
- Actioning a comprehensive plan identifying risk factors linked to the physical and psychological environment and contributing to harassment, discrimination and violence, offering preventive mitigation measures, and finalizing a formal recourse process should employees want to disclose or address workplace wrongdoing with an emphasis on early resolution.
- Sharing PSES findings with management and empowering them to address harmful behaviours swiftly and effectively through a zero-tolerance approach if incidents are reported to them or should they witness problematic behaviours.

Pillar: Accessible Programs and Services

Through its programs, PCH plays a vital role in funding arts, culture, heritage and sport sectors in Canada. It does so with an underlying mandate to support inclusive, diverse, equitable and accessible understandings of Canadian identities. High level common barriers across a myriad of programs were identified and proposals put forth by a Working Group consisting of programs from all regions in our Accessibility Plan. Since then, delays have been encountered in moving from intent to action.

A priority will be the launch of a Grants and Contributions (Gs & Cs) Program Review (2024-26), which will include looking at persistent systemic barriers embedded in our practices and mindsets and recognizing that even seemingly "neutral" policies can enable marginalization.

Program managers will pursue self-assessments of publicly oriented programs through a "disability" lens (eligibility, funding criteria, outreach practices) and determine whether there are concrete actions that can be taken to render them more accessible to persons with disabilities. The Centre of Excellence on Gs and Cs will join the Policy Research Group in developing disaggregated data collection models to address barriers.

Some examples of achievements undertaken by programs to date include:

- Revised Gender-Based Analysis Plus tools to include a disability lens and promote the more holistic concept of IDEA in policy development.
- Provided in person assistance in completing funding applications to the Canada Arts Presentation Fund as part of the Western region's oral application pilot.
- Created an accessible ministerial letter of approval for clients who are blind, visually impaired or otherwise print-disabled.

- State Ceremonial, Celebrations and Commemoration Services have undertaken several improvements including: completed baseline assessment of accessibility and reasonable accommodation for celebrations, commemorations and events and developed the Canadian National Anthem in ASL/LSQ.

Conclusion

The PCH Accessibility Plan provides a roadmap towards sustainable and transformative change towards accessibility and disability inclusion. Through corporate commitments, organization-wide collaboration, and ongoing communication efforts, we are creating the culture change needed to become an inclusive employer, an accessibility-confident organization and service provider.

At PCH we understand that we can and must also continue to do better. While our commitment must be long-term, the need for action is immediate. As we shift from awareness to action, we must continually challenge ourselves to assess our biases and rethink our viewpoints so that we may see dis-ABILITY in a different light.

Next Steps:
In 2023-24, we will prioritize:
- Measurement approaches (performance indicators, dashboards) will be applied to track progress in implementing the 131 actions in the PCH Accessibility Plan.
- A department-wide survey to gauge whether perception of accessibility at PCH is aligned between employees, persons with disabilities and senior management.
- Efforts to meet our PCH hiring commitment of persons with disabilities by 2025, including through the addition of a commitment in Performance Management Agreements for executives and excluded managers.
- Successful onboarding of people with disabilities, to provide them with the tools and the accommodations they need to succeed, along with barrier-free access to the same career development opportunities as colleagues without disabilities.
- Efforts to continue to encourage GC Passport implementation and integration into employee recruitment, retention and advancement processes and practices.
- Collaboration with TBS to produce a digital version of the GC Passport expected to be launched in March 2024.
- Engagement with external disability stakeholders on barriers that may be preventing them from fully accessing our programs.
- Stronger relationships with Indigenous people as part of our commitment to building culturally appropriate and distinctions-based services, programs and spaces within First Nations, Inuit, and Métis communities that advance the inclusion of persons with disabilities.
- Investments in accessibility as part of the modernization and return to Les Terrasses de la Chaudière.

- Research to identify root causes to prevent incidents of harassment, discrimination and violence as they continue to pose significant health and safety risk for employees, especially employees with disabilities.
- Promoting use of the PCH Feedback Mechanism to hear and support employees in addressing barriers identified, as noted in the next section of the report.
- Proposing two new pillars to the PCH Accessibility Plan to address Harassment, Violence Prevention and Resolution, as well as Transportation.

Glossary – the glossary will be linked upon publication.

Annex A: Feedback

PCH launched its Accessibility Feedback Mechanism in December 2022 to offer employees and Canadians the opportunity to provide their comments and concerns on accessibility barriers and on our Accessibility Plan. Feedback can be provided online via a HTML form, by email, by phone (including VRS) and by physical mail. People can choose to identify themselves or remain fully or partially[3] anonymous.

As we are required to publicly report on the feedback received and how we have addressed it, when we receive a submission, it is:

- Entered in our tracking system and analyzed to determine which team at PCH should take the lead in responding in a timely manner.
- If barriers are more complex in nature and touch upon more than one pillar, we have set up a cross-pillar committee, the Accessibility Feedback Group, that allows response in a collaborative fashion.
- An acknowledgement is sent to the individual (if non-anonymous) thanking them for their feedback, informing them that their feedback is being reviewed, and that they will be provided a response when a resolution has been determined.
- Once a resolution is determined, a response is sent, and the case is closed.
- For comments received anonymously, information on the obstacle identified and its resolution is included in our newsletter or on our News@PCH intranet site.

This report shows feedback received from both internal and external sources and how this feedback was addressed.

PCH Accessibility Feedback

Since the launch of the feedback mechanism, the PCH Accessibility Office has received valuable observations helping us ensure that we continue to actively eliminate barriers for our employees and for Canadians we serve. Here are the principal concerns raised:

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[3] Individuals who provide feedback may consent to our Accessibility Office knowing their identity. However, they may wish to remain anonymous to anyone else in the department working on their case. For more information on how the department handles anonymity please see our Accessibility Feedback Process.

Trend 1. Return to the physical workplace
Barriers:
- Delays due to high volume of requests received in a short timeframe.
- Lack of tracking mechanism to monitor progress of requests.
- Confusion between Duty to accommodate and 6 exceptions first outlined by TBS for approving full time telework which made no mention of people with disabilities.

How are these being resolved:
The Bob Fern Centre has set up a committee of key departmental partners (HR, IT, Facilities Management) to coordinate the efforts of the various partners to improve efficiency, find innovative solutions and implement them quickly. Its staff has been strengthened and a new request tracking tool has been internally developed.

Every letter of offer now includes reference to the Bob Fern Centre's responsibilities for employee accommodation services. This action enables the Bob Fern Centre to proactively communicate with these new employees and their managers to put accommodations in place before the employee arrives and, where possible, transfer accommodation measures to the new workplace. This makes for a simpler, more personalized welcome.

While PCH is an early adopter of the GC Passport, the return-to-work experience has shown that managers need a better understanding of how to practice a 'yes-by-default' approach to lessen resistance to accommodation measures. The Bob Fern Centre has stepped up information sessions to demystify accommodation and use of the Passport, and developed tools to help them navigate various options.

Trend 2. Attitudinal and unconscious bias toward invisible disabilities
Barriers:

Employees reported conversations with their management teams which lean towards the presence of unconscious bias related to employees living with a disability. Barriers were attitudinal in nature and often related to accommodation requests.

They underscore that there is still much misunderstanding about the capabilities of employees with disabilities, especially invisible disabilities. Many continue to operate under the Medical rather than Social Model of disability. Our Accessibility Plan speaks to the need for "a paradigm shift away from the inability of an individual to engage with their environment to the need of environments to be inclusive of all abilities."[4]

How are these issues being resolved:
- Training for employees, managers and executives related to unconscious bias.
- Corporate-level communications strategies regarding ableism.
- Educating employees and their managers about the social model of disability.

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[4] https://www.canada.ca/en/canadian-heritage/corporate/accessibility/plan.html#a1c

Trend 3. Issues related to requests for medical notes

Barriers:

A number of managers (sometimes on the advice of the Labour Relations team) have asked employees to provide medical notes in support of their request for accommodation, suggesting a continuing misunderstanding of the need for 'medical notes'. In some cases, employees who had provided medical notes were asked to provide additional medical evidence or to seek advice from a doctor chosen by the employer. Requests for medical or health-related information can create a sense of mistrust between managers and employees, with the latter feeling that they must constantly prove the existence of their disability, rather than being taken at their word. This goes against the principles of the GC Passport and the spirit of the ACA. It is a step backwards towards the medical model of disability, where people are seen as needing to be 'fixed' and having to justify their accommodation.

How are these being resolved:

According to TBS detailed instructions on the GC Passport, while managers can ask employees for 'medical notes', 'employees are not required to disclose any medical or health-related information'.[5]

- Mandatory training for managers, employees and executives related to bias and discrimination towards persons with disabilities.
- Corporate-level communications promoting the GC Passport and addressing the paradigm shift away from the medical model of disability[6] towards the social model of disability[7].
- Promoting a culture of care where employers and managers listen and trust their employees, understand their needs rather than assume what is right for them.
- Frequent presentations and discussions at management tables on the question of the need for 'medical notes' in the accommodations process.
- Promotion of the GC Passport as the tool to use to support conversations on accessibility and accommodation. Promotion of the following messages:
  - Rather than asking for a medical note, managers and employees should follow the GC Passport guidelines and focus their conversations on the situation (working conditions, responsibilities), the barriers faced by the employee in performing those tasks, and the solutions that will address those barriers.

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[5] GC Workplace Accessibility Passport/ Passeport d'accessibilité au lieu de travail du GC - GCpedia

[6] The medical model of disability "frames disability as a medical concern involving impairment or abnormality of mental or bodily function." - Lysaght, Rosemary, Hélène Ouellette-Kuntz and Cheng-Jung Lin. 2012. "Untapped Potential: Perspectives on the Employment of People with Intellectual Disability." Work 41, 4 (2012): 410.

[7] "The social model views disability as part of the diversity of the human condition. In this view, disability is not necessarily undesirable nor a condition in need of being cured." - Lysaght, Rosemary, Hélène Ouellette-Kuntz and Cheng-Jung Lin. 2012. "Untapped Potential: Perspectives on the Employment of People with Intellectual Disability." Work 41, 4 (2012): 410.

- o If employees do not know how to describe their barriers or what solutions might be possible, they should be directed to experts, via the Bob Fern Centre, who can help them. This will ensure managers have enough information to approve accommodations in the GC Passport.
- o The ACA is about creating workplaces that value the skills and talents that every employee brings and equips them to achieve their full potential.

Trend 4. Failure to respect persons with disabilities' rights to privacy
Barriers:

Employees were asked to widely share medical information or asked to self-identify to their manager to receive accommodations. Additionally, when the type of information being sought was unclear, employees often felt that their circumstances were being publicly discussed and that their privacy was not being respected.

How are these being resolved:
- Presentations on the right to privacy and the GC Passport to employees and managers across the department to encourage understanding and its adoption.
- Promotion of the GC Passport through communication products.

Trend 5. Improved services for people using assistive technologies
Barriers:
- The need for a cleanup of PCH computers, laptops and tablets as the number of applications on the desktop can be an accessibility barrier for some people.
- The need for more user testing with people with lived experience to ensure that all documents, websites and forms prepared by PCH are accessible.
- Insufficient knowledge to support employees and clients with speech disabilities:
  - o Suggestions: those providing services to employees over the phone could offer the use of the chat function, such as MS Teams, to fully understand what the employee needs. This solution may also be useful to all, as they may find chat function easier for articulating their needs.
- Challenges related to PDF forms in funding applications especially for Apple devices.
- Lack of an internal service at PCH to create accessible PDFs, and limited capacity to migrate PDFs from funding programs to the Canadian Heritage Funding Portal (CHFP), a grants and contributions online system. This keeps PCH relying on externally created accessible PDFs. In addition, internal forms created through the O365 platform are not accessible due to platform limitations.

How are these being resolved:
- PCH is developing a Business Case to replace legacy systems. If secured, PCH could begin replacing legacy systems, such as GCIMS/GCLinks.

- PCH has begun onboarding programs to the new digital CHFP, where the primary forms are web pages, accessible to those using adaptive technologies. PDF format will only be provided as an alternative, upon request.

Next Steps: Measuring the success of the Feedback Mechanism

To help us determine whether we need to better promote our Feedback Mechanism and/ or adjust how we handle feedback going forward, the PCH Accessibility Office will be conducting surveys to measure:

1. awareness of the Feedback Mechanism itself by PCH employees and the public
2. the satisfaction rate of those who provided feedback.

Conclusion

Feedback brought to light discrepancies between legislation that preceded the ACA and the ACA itself, and the misunderstanding this creates for processes across government. It highlighted the need for us to continue to work towards alignment as well as greater understanding of the ACA and the tools that support its implementation, such as the GC Accessibility Workplace Passport.

The feedback received also underscored our shared responsibility to improving our environments, so they are inclusive of all abilities. At PCH, we believe that fostering a culture of care and implementing a "Yes-by-default" approach to accommodations will be critical to getting us there. This will require diligence, dedication, training, and deliberate collective action to address our biases.

Statistics

As of October 13, 2023, PCH has received a total of 50 submissions, 28 from internal sources (employees) and 22 from external sources (the public).

Table 1: Feedback by Pillar in Accessibility Plan

Pillar	Submissions received from internal sources	Submissions received from external sources
Employment (specific to accommodation)	14	0
Built Environment	2	1
Information and Communication Technology (ICT)	6	1
Communications	3	2
Procurement	1	0
Program and service delivery	5	2
Culture	10	2
Total	**41**	**8**

Note: Some feedback received was identified under a few barriers.

Table 2: How feedback was provided

How feedback was provided	Number of submissions received internally	Number of submissions received externally
Online form	20	19
Email	7	3
Phone	1	0
Video Relay Service (VRS)	0	0
Physical mail	0	0
Total	**28**	**22**

Note: For one internal feedback submission, the same feedback was sent by email and through a form. This feedback was reflected in these statistics through the form submission only as it pertained to the same issue.