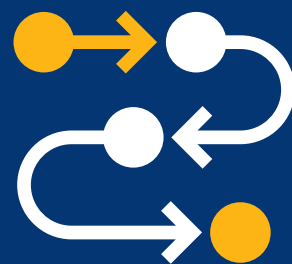


Accessible Service Delivery and Employment Accessibility Standards Engagement

What We Learned Report



BRITISH
COLUMBIA

Table of Contents

Executive Summary	2
Key Themes	3
Accessible Service Delivery	4
Employment Accessibility	5
Implementation	6
1.0 Introduction	7
Background	8
2.0 Engagement Opportunities & Process	9
Engagement Objectives	11
Communication Methods	11
Engagement Opportunities	12
Accessibility Considerations & Accommodations	14
Community-Led Sessions: Grant Opportunities & Process	15
3.0 What We Learned	16
Key Themes	17
Online Survey	21
Virtual Regional Town Halls	33
Sector Engagement	37
Written Submissions	41
Community-Led Sessions	47
Engagement Feedback	60
4.0 Next Steps	62

Executive Summary

The Provincial Accessibility Committee (PAC) was established in 2021 when the Accessible B.C. Act became law. Since January 2023, the Provincial Accessibility Committee has worked with technical committees on drafting recommendations for the **Accessible Service Delivery** and **Employment Accessibility** standards.

From May to July 2024, the Accessibility Directorate in the Ministry of Social Development and Poverty Reduction gathered feedback on these draft standard recommendations through provincewide public consultation. To ensure a diverse range of perspectives were reflected in the feedback, there were a variety of opportunities for people to participate, including an online survey, virtual regional town halls, workshops for sector partners, community-led sessions and written or video submissions.

A priority was placed on providing accessible opportunities for the groups most affected by the standards to participate, including people with disabilities and advocacy organizations, organizations such as public sector agencies and private businesses, and First Nations, Métis and Indigenous organizations.

The feedback gathered from participants on the draft standard recommendations includes a mix of positive sentiments and concerns about enhancing accessibility in B.C. Key pieces of overarching feedback on the draft standard recommendations include:

- Optimism about the potential for these standards to **promote greater inclusion** and **dismantle systemic barriers** faced by individuals with disabilities at work and when accessing services.
- A strong call for **clearer and specific requirements** in the standards to ensure effective implementation by businesses and employers.
- The need for a comprehensive approach that also actively **challenges societal attitudes** and **fosters understanding** of the many types of disabilities and accessibility needs that exist.

Key Themes



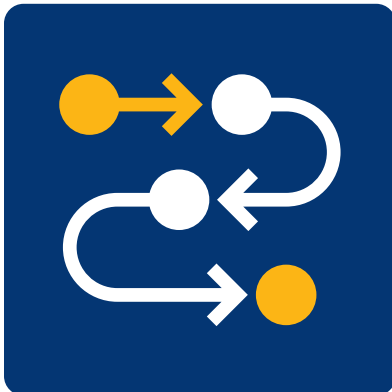
Implementation



Accommodations



Built Environment



**Compliance and
Enforcement**



**Communication
and Awareness**



Inclusion

Accessible Service Delivery

Participants generally supported the draft Accessible Service Delivery standard recommendations. At a high level, themes from the feedback included:

- **Too general:** some participants were concerned that the draft recommendations are too general or lenient, and recommended the standards be a “floor, not a ceiling” for accessibility requirements.
- **Clear guidelines:** participants felt that specific actions and clear, enforceable guidelines would help avoid challenges with implementation and support smaller organizations with less resources.
- **Training:** participants emphasized the importance of ongoing training with a focus on cultural sensitivity and lived experience.
- **Built environment:** participants wanted more specific built environment requirements, such as ramps and audible cues, and stressed the need for clear accessibility information for buildings to be available online.
- **Accommodations:** participants provided a variety of feedback on recommendations related to accommodations for assistive devices and service animals, with calls to expand definitions and align standards with provincial regulations.
- **Documentation:** participants shared concerns about documentation and evidence requirements, since obtaining proof for accommodations is burdensome for people with disabilities.
- **Communication:** participants advocated for plain language, multiple access points, and early public education on disability awareness.

“We are citizens, we are consumers, we have rights to full-service access.”

– quote from participant

Employment Accessibility



Feedback on the draft Employment Accessibility standard recommendations was generally supportive. However, participants did share some concerns and suggestions for improvement, including:

- **Vague terminology:** lack of clarity in the wording, particularly around “undue hardship”, which could lead to minimal compliance from employers.
- **Recruitment practices:** recruitment was identified as a significant barrier, with calls for accessible processes and training to combat biases.
- **Communication:** participants emphasized the need for ongoing communication about accommodations, flexible workplace policies and remote work options.
- **Enforcement:** participants felt strongly that clear monitoring and enforcement will be needed to ensure compliance.
- **Inclusion:** participants provided several suggestions related to ensuring inclusion, such as addressing intersectional discrimination, providing accessible training, recognizing the needs of individuals with invisible disabilities and including multilingual solutions.

“Proactivity is key in making workspaces accessible.”

– quote from participant

Implementation



Participants generally found the draft accessibility standard recommendations feasible to implement. In general, participants emphasized that organizations of different sizes have different resources and capacity to implement the standards. Key themes from the feedback include:

- **Immediate need:** individuals with disabilities stressed the urgency of implementation, calling for immediate action and pointing out that some of these changes are overdue.
- **Small versus large organizations:** participants from smaller organizations shared the need for flexible timelines for implementation due to resource constraints. Most large organizations felt two years would be insufficient to implement these standards.
- **Supports for implementation:** key supports that could assist with implementation include funding, expert guidance and training resources.
- **Phased approach:** a phased approach was widely recommended, allowing larger organizations to implement changes first, followed by smaller entities.
- **Involve people with lived experience:** participants also highlighted the importance of involving advocacy groups and individuals with lived experiences in the implementation and training process to ensure the standards consider diverse needs throughout B.C. workplaces and services.

“For new societal norms to be established, everyone needs to play a role.”

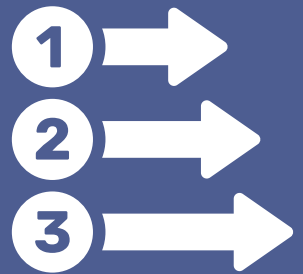
– quote from participant

“These proposed recommendations are simply good values that we should all carry with us through life.”

– quote from participant

1.0

Introduction



Background

In June 2021, the Accessible B.C. Act became law. It provides a framework to identify, remove and prevent barriers to accessibility.

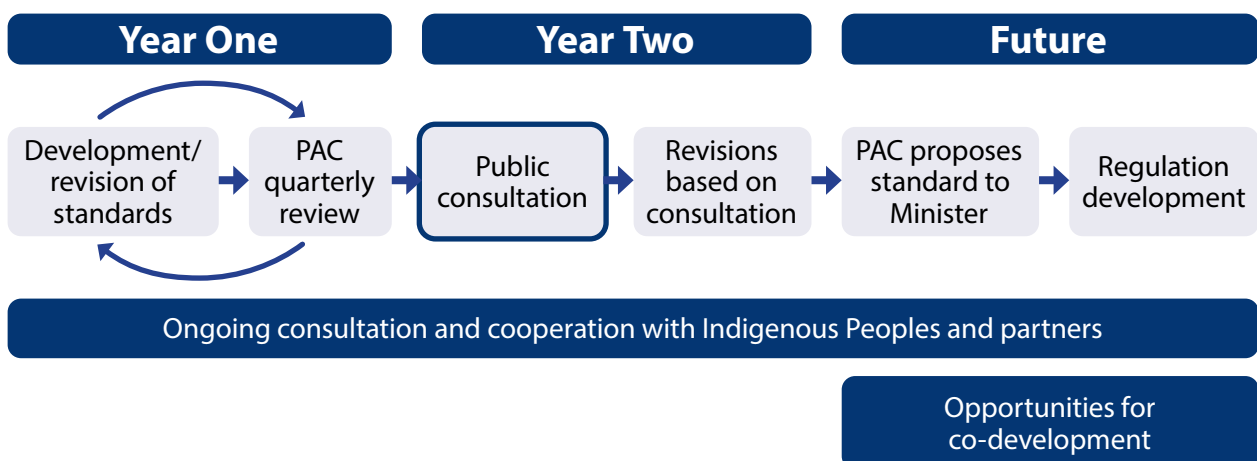
The Accessible B.C. Act also mandated the Provincial Accessibility Committee (PAC) to develop accessibility standards. These standards will be a set of rules or guidelines that provide best practices for accessibility in a range of areas. The first two standards in development are for Accessible Service Delivery and Employment Accessibility.

- **Accessible Service Delivery standards** are focused on addressing barriers both in the physical and virtual environment to ensure that events, activities, advice and the process of buying goods are provided in accessible ways.
- **Employment Accessibility standards** aim to identify, remove and prevent barriers to people with disabilities in hiring, training and retention.

PAC, with support from technical committees, completed the draft standard recommendations on these two standard areas in April 2024.

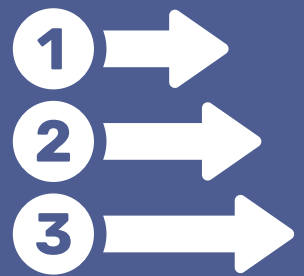
To gather feedback on the draft standard recommendations, provincewide public consultation took place from May 31 to July 31, 2024. Input from this engagement will be used to help ensure the recommendations the PAC brings to the Minister of Social Development and Poverty Reduction reflect the experiences of people with disabilities, as well as the perspectives of organizations and agencies that might be affected by the standards.

Figure 1: Accessibility Standards Development Roadmap



2.0

Engagement Opportunities & Process



Public consultations for the draft accessibility standards were provincewide, with an emphasis on ensuring regional representation and a wide range of perspectives across sectors to ensure input was received from as many people in British Columbia as possible. There were a variety of opportunities for people to learn and provide feedback, including an online survey, virtual regional town halls, workshops for sector partners, community-led sessions and written or video submissions.

Priority was placed on ensuring diverse perspectives were received on the standards, and that targeted opportunities were provided for groups such as:

- **People with disabilities and advocacy organizations**, including individuals or organizations that serve people who:
 - Are blind or partially sighted
 - Are Deaf and hard of hearing
 - Are neurodiverse
 - Experience mobility challenges
 - Have developmental disabilities
 - Are children and youth
 - Are Indigenous, Black and People of Colour
 - Are Two-Spirit, Lesbian, Gay, Bisexual, Transgender, Queer, Intersex or Asexual/ Aromantic or otherwise members of the 2SLGBTQIA+ community
- **Organizations that are likely to be affected by these standards:**
 - Government agencies
 - Industries
 - Businesses
- **Rights holders and Indigenous partners:**
 - First Nations
 - Métis
 - Urban Indigenous Peoples and organizations

Engagement Objectives

The goals of the engagement were to:

- Ensure a robust and accessible process that provides space for a wide range of feedback.
- Learn from diverse perspectives throughout the province about:
 - Whether the proposed standards effectively address barriers experienced by people with disabilities.
 - The potential impacts of these standards on organizations that are likely to be regulated, balancing barrier removal with minimal regulatory burden.
 - Suggestions on how the standards can be improved.
- Raise awareness among participants about the overall process of developing accessibility standards under the Accessible B.C. Act, including upcoming standards.
- Gather lessons learned to inform future engagement processes for new standards.

Communication Methods

The engagement process and opportunities to participate were communicated with targeted audiences and the public in several ways:

- Emails were sent directly from the Accessibility Directorate to key partners, including advocacy organizations, government agencies and First Nations, Métis and Indigenous organizations.
- The Accessibility Directorate facilitated several in-person information sessions with key partners to spread awareness of engagement activities.
- A project web page was created to share background information and host online engagement opportunities.
- Opportunities to participate were promoted on social media.

Engagement Opportunities



The Accessibility Directorate initiated provincewide public consultation and engagement. Engagement consisted of five key methods to engage targeted groups of people: an online survey, virtual regional town halls, workshops for sector partners, community-led sessions and written or video submissions.

Online Survey

An online survey was available in six languages between May 31 and July 31, 2024. The survey asked about participants' thoughts on the draft standard recommendations.

There were four sections in the survey:

- Section 1 asked questions about the **Accessible Service Delivery standard**,
- Section 2 asked questions about the **Employment Accessibility standard**,
- Section 3 asked questions about the **implementation** of the draft accessibility standards, and
- Section 4 asked for **demographic information**.

The survey took approximately 15 to 30 minutes to complete, and participants were asked to review the draft standards for Accessible Service Delivery and Employment Accessibility to complete the survey.

Virtual Regional Town Halls

From June 11 to June 27, 2024, the Accessibility Directorate held a series of virtual regional town halls to collect input on the proposed Accessible Service Delivery and Employment Accessibility standards.

A total of five public virtual regional town halls were hosted. The regions and dates for these town halls were:

- Vancouver Island/Coastal Region on June 11, 2024
- Mainland/Southwest Region on June 11, 2024
- Thompson Okanagan and Kootenay Regions on June 13, 2024
- Cariboo and Nechako Regions on June 24, 2024
- North Coast and Northeast Regions on June 27, 2024

Sector Engagement

From July 3 to July 25, 2024, the Accessibility Directorate held a series of sector engagement meetings to collect input on the proposed Accessible Service Delivery and Employment Accessibility standards.

Participants self-selected into the following virtual sessions:

- Public sector session on July 3, 2024
- Business and industry associations session on July 4, 2024
- Labour organizations and unions session on July 9, 2024
- Education sector session on July 10, 2024
- Health and social sector session on July 11, 2024
- Transportation sector session on July 16, 2024
- Service and advocacy sector session on July 17, 2024
- Accessibility committees session 1 on July 18, 2024
- Youth and youth serving sector session on July 18, 2024
- Equity-deserving groups session on July 24, 2024
- Accessibility committees session 2 on July 25, 2024

Written or Video Submissions

All people living in British Columbia, including people with disabilities, advocates, business and industry groups, as well as Indigenous communities and organizations were invited to submit their input through written or video submission by July 31, 2024.

Community-Led Sessions

Indigenous organizations and partners, community organizations and organizations representing an equity-deserving group were invited to apply for funding to host small group roundtable discussions using a provided facilitation toolkit. All applications were welcomed, with priority placed on organizations serving rural and remote regions.

Accessibility Considerations & Accommodations



All virtual engagement sessions hosted by the Accessibility Directorate were designed to be as accessible to as many participants as possible. Prior to the sessions, participants were invited to identify any accommodations they would need to participate. Additional proactive considerations for the facilitation of each session included:

- American Sign Language (ASL) and Communications Access Realtime Translation (CART) were available at all virtual sessions.
- Participants were able to provide feedback in the sessions in multiple ways: verbally, through writing in the chat, or through writing in Mural, the virtual whiteboard tool used to take notes in the sessions.
- Participants were divided into breakout groups to have discussions in smaller groups.
- Facilitators adapted the presentation and conversation as needed during each session based on feedback from participants.

Community-Led Sessions: Grant Opportunities & Process

Grants to host community-led engagement sessions were awarded principally to non-profit organizations that work with a variety of groups facing barriers and challenges in B.C., particularly people with a range of disabilities, but also newcomers to Canada, Indigenous People and people living in northern and rural communities. Applications were open from May 31 to June 30 and an extension was given until July 15.

Grant Applications & Recipients

While a total of 47 organizations applied for funding, 35 grants were awarded. The main factors evaluated in the applications were whether the applicant understood and agreed with the purpose of the funding, the approach proposed for engagement and collecting information, and the budget. Almost all applicants who satisfied these requirements and responded to questions from the evaluator received funding. Funding was provided the week following financial information being provided by applicants.

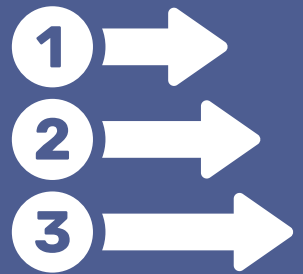
Applications are also summarized by geographical distribution zone. While most applicant organizations were based in the Lower Mainland, several of them completed engagements in other places, including the Thompson Okanagan and the North Coast. Several engagements hosted by organizations based in the Lower Mainland were online and open to residents throughout B.C.

Table 1: Applications by geographical distribution zone

Geographical Distribution Zones	Recommended Number of Approved Applications
Vancouver Island/Coast	7
Mainland/Southwest	17
Thompson-Okanagan	5
Cariboo	5
North Coast	1
TOTAL	35

3.0

What We Learned



Key Themes



The top themes heard in feedback on the Accessible Service Delivery and Employment Accessibility standards across all engagement methods were **Implementation, Accommodations, Built Environment, Compliance and Enforcement, Communication and Awareness** and **Inclusion**. These themes represent a range of sentiments on each topic:

- **Implementation:** how the standards are expected to be implemented by businesses and employers including timeline, responsibilities and availability of support including **training, funding** and **resources**.
- **Accommodations:** accommodations or access needs in employment and service settings.
- **Built Environment:** physical barriers to accessibility.
- **Compliance and Enforcement:** how the standards will ensure compliance and accountability, including consideration of penalties or fines.
- **Communication and Awareness:** clarity and accessibility of communication about the standards as well as accessibility of communication in service or employment settings.
- **Inclusion:** meaningful involvement of a diversity of people with disabilities in development of the standards, consideration in the standards and inclusion in activities related to implementing the standards.

Generally, the feedback on the proposed standards was supportive; most of the critical input looked for specifics on various aspects that ensures all people with disabilities will be meaningfully considered. Broad feedback was also identified:

- Optimism about the potential for these standards to **promote greater inclusion** and **dismantle systemic barriers** faced by individuals with disabilities at work and when accessing services.
- A strong call for **clearer and more specific requirements** in the standards to ensure effective implementation by businesses and employers.
- The need for a comprehensive approach that also actively **challenges societal attitudes** and **fosters understanding** of the many types of disabilities and accessibility needs that exist.

Accessible Service Delivery

Participants generally supported the draft Accessible Service Delivery standard recommendations. At a high level, themes from the feedback included:

- **Too general:** some participants were concerned that the draft recommendations are too general or lenient, and recommended the standards be a “floor, not a ceiling” for accessibility requirements.
- **Clear guidelines:** participants felt that specific actions and clear, enforceable guidelines would help avoid challenges with implementation and support smaller organizations with less resources.
- **Training:** participants emphasized the importance of ongoing training with a focus on cultural sensitivity and lived experience.
- **Built environment:** participants wanted more specific built environment requirements, such as ramps and audible cues, and stressed the need for clear accessibility information for buildings to be available online.
- **Accommodations:** recommendations related to accommodations for assistive devices and service animals received varied feedback, with calls to expand definitions and align standards with provincial regulations.
- **Documentation:** participants shared concerns about documentation and evidence requirements, since obtaining proof for accommodations is burdensome for people with disabilities.
- **Communication:** participants advocated for plain language, multiple access points, and early public education on disability awareness.

Employment Accessibility

Feedback on the draft Employment Accessibility standards recommendations was generally supportive. However, participants did share some concerns and suggestions for improvement, including:

- **Vague terminology:** lack of clarity in the wording, particularly around “undue hardship” could lead to minimal compliance from employers.
- **Recruitment practices:** recruitment was identified as a significant barrier, with calls for accessible processes and training to combat biases.
- **Communication:** participants emphasized the need for ongoing communication about accommodations, flexible workplace policies and remote work options.
- **Compliance and Enforcement:** participants strongly felt that clear monitoring and enforcement will be needed to ensure compliance.
- **Inclusion:** participants provided several suggestions related to ensuring inclusion, such as addressing intersectional discrimination, providing accessible training, recognizing the needs of individuals with invisible disabilities and including multilingual solutions.

Implementation

Participants generally found the draft accessibility standard recommendations feasible to implement. In general, participants emphasized that organizations of different sizes have different resources and capacity to implement the standards. Key themes from the feedback include:

- **Immediate need:** individuals with disabilities stressed the urgency of implementation, calling for immediate action and pointing out that some of these changes are overdue.
- **Small versus large organizations:** participants from smaller organizations shared the need for flexible timelines for implementation due to resource constraints. Most large organizations felt two years would be insufficient to implement the standards.
- **Supports for implementation:** key supports that could assist with implementation include funding, expert guidance and training resources.
- **Phased approach:** a phased approach was widely recommended, allowing larger organizations to implement changes first, followed by smaller entities.
- **Involve people with lived experience:** participants also highlighted the importance of involving advocacy groups and individuals with lived experiences in the implementation and training process to ensure the standards consider diverse needs across B.C. workplaces and services.

Online Survey



Participant Overview

There were **1,344 responses** to the survey. When asked what best described their interest in or connection to the accessibility standards, respondents indicated that they were:

- A person with an impairment or living with a disability (1,096, 82%)
- An interested member of the public (451, 34%)
- An organization providing services to the public or a representative of a service-providing organization (133, 10%)
- An Indigenous person and/or representative of an Indigenous Nation, community or organization (First Nations, Métis and Inuit) (101, 8%)
- A representative or member of an advocacy organization (96, 7%)
- A member of a government agency (87, 6%)
- Someone with academic expertise in this area (84, 6%)
- An employer or representative of an employer (74, 6%)
- A private sector organization or business (27, 2%)

Note: respondents could select multiple options.

Key Themes

General

There were several common themes across survey responses, reflecting general feedback rather than suggestions specific to the standards in question.

A prominent negative sentiment was the limited representation of different disabilities throughout the Accessible Service Delivery standard and Employment Accessibility standard. Many respondents expressed that the information and examples seemed focused on visible disabilities (such as physical mobility limitations) and were not inclusive of a wide range of invisible disabilities. This includes cognitive, learning, sensory, neurodiverse/neurodivergent, chronic and language-based disabilities.

Another common sentiment was the information in the standards, and the survey itself, being hard to follow or understand, especially for those with learning or cognitive disabilities. Several respondents pointed out that some survey response options did not match the question itself, and responses to some questions suggest misinterpretation.

Many responses reflected opinions on broader ministry systems and processes related to the accessibility standards. Respondents shared negative experiences with, and suggested changes to accessibility-related programs and processes, including benefits, income, applications and eligibility requirements.

Accessible Service Delivery Standard

Overall, 63% of respondents indicated they had read the Accessible Service Delivery standard, 28% indicated they had partially read it, and 9% indicated they had not read it.

Generally, respondents indicated that the draft recommendations under each of the Accessible Service Delivery themes would be very important for removing accessibility barriers.

When asked about their thoughts on the proposed recommendations under the Accessible Service Delivery standard, there were several key themes among respondents' feedback.

Positive feedback

Many respondents provided general statements of support, and expressed that the standard was important, meaningful and valuable. Some respondents said the recommendations were thorough and comprehensive, with helpful examples and good use of plain language.

Respondents strongly supported the general obligation that organizations need to offer the same types of services for people with disabilities and need to make sure that people with disabilities are treated with respect.

Negative feedback

Contrary to some of the positive feedback, much of the negative feedback stated that the standard and recommendations were too vague, lacking detail, and not concrete enough. A general sentiment was that the recommendations did not go far enough – covering the bare minimum of what should be expected from organizations. Respondents stressed that the recommendations in the standard should be considered the “floor, not the ceiling” and that organizations can and should be encouraged to go further.

Other common negative feedback were concerns about implementation, compliance and enforcement of the Accessible Service Delivery standard recommendations. Many respondents expressed concerns that:

- Without clear and detailed guidance around implementation, many organizations will not implement the recommendations.
- The time and effort to implement the recommendations, especially for smaller businesses, will be challenging, especially without any supports being provided.
- Without clear and concrete mechanisms for monitoring and enforcing compliance, many organizations will not implement or uphold the recommendations.

More feedback about implementation can be found in the **Implementation** section below.

Training

Respondents were generally supportive of the recommendations for providing and documenting training. The importance of compulsory, comprehensive training for organizations and employees was emphasized.

Several respondents suggested more detail around this training was needed – including what it should cover and who would conduct it. Some suggested that qualified or experienced trainers, including people with lived experience of having disabilities, should be administering the required training to organizations.

Some respondents also suggested that training should include and emphasize sensitivity, respect and empathy, alongside any practical information about accessibility and accommodations.

Guide dogs and service animals

There was mixed feedback on the recommendation that organizations are not allowed to require formal proof or identification from people who use a guide dog or service dog. Some supported that recommendation, while others were against it. Concerns among respondents who were against the recommendation included:

- **Misuse:** some people may misuse or abuse the system, taking pets or untrained animals into public spaces, an issue already prevalent according to several respondents.
- **Risks:** people with allergies, fears or phobias could be placed at risk.
- **Other requirements:** the recommendation contradicts the provincial requirement to officially certify trained service dogs.

Some respondents also suggested the need to expand these recommendations to include other service animals, such as emotional support animals. The importance of clear definitions for service dogs, guide dogs and other support animals was suggested.

Built environment

Several respondents felt more detail was needed related to the recommendation that barriers in the physical environment need to be removed as much as possible. Respondents felt that more examples should be included of what barriers can and should be removed. Respondents also felt that firmer language was needed. Stating when these barriers can be removed “for very little or no money,” organizations need to remove those barriers “as much as possible,” was considered too lenient.

Some common suggestions for aspects of the physical environment, or accessibility features within physical environments, that should be specified in the recommendations included:

- **Built form:** more accessible entrances, ramps, elevators, lifts and building layouts, and more frequent maintenance of these features. This includes adherence to design standards.
- **Washrooms:** more accessible washrooms, and clearer wayfinding to accessible washrooms. The importance of universal access to washrooms (i.e., not limited to employees or customers), was emphasized in relation to those with digestive disabilities (such as irritable bowel syndrome and Crohn’s disease).
- **Air quality:** establishment, enforcement and communication of clean air standards, including air ventilation and filtration to ensure spaces are free of allergens, fragrances and airborne pathogens. Many respondents noted the importance of air quality in relation to those who may be immunocompromised or asthmatic.
- **Sensory spaces:** sensory-friendly spaces (i.e., environments with lower sound, lighting and visitor numbers), to accommodate those with sensory impairments or sensitivities.

Documentation and evidence

Survey respondents generally supported the recommendation that organizations are not allowed to ask people to prove that they have a disability or require accommodations. The processes involved in getting the documentation or evidence required as proof was noted by many as a significant barrier for people with disabilities.

The need for organizations to document information about accommodations and alternatives was supported by some respondents but critiqued by many. Documentation of a missing or refused accommodation is neither a solution nor consequence, so respondents questioned how this would hold organizations accountable or remove barriers.

Assistive devices

The recommendations that assistive devices should be welcomed and accommodated across organizations were well supported. However, survey participants suggested more examples of assistive devices were needed in the standard, to ensure representation of more disabilities, and better understanding among organizations. Suggestions for assistive devices that could be included were:

- Respiratory equipment, such as masks, inhalers and personal respirators
- Mobility scooters
- Hearing aids
- Health monitors
- Insulin pumps

Employment Accessibility Standards

Overall, 62% of respondents indicated they had read the Employment Accessibility standard, 28% indicated they had partially read it, and 10% indicated they had not read it.

Generally, respondents indicated that the draft recommendations under each of the Employment Accessibility standard themes would be very important for removing accessibility barriers.

Note: several respondents highlighted inconsistencies in the wording of this question (“drawing on your knowledge and observation of barriers people with disabilities experience in accessing employment, how would you rate the effectiveness of the draft recommendations under each of the Employment Accessibility standard themes to remove these barriers?”). The question asked about effectiveness, but the response options were framed in terms of importance.

Positive feedback

When asked about their thoughts on the Employee Accessibility standard, many respondents expressed support for the proposed recommendations. Many said that the recommendations were practical, well considered, and a positive step forward to creating more accessible and more inclusive workplaces.

Respondents appreciated that employers should provide accommodations for employees during their employment, as well as during the interview process. There was also support for not requiring proof of disability to receive accommodations.

When followed, the recommendations were generally seen to help remove barriers experienced by people with disabilities.

Negative feedback

Similar to the critiques about the draft Accessible Service Delivery standard, there was negative feedback about the vague, open-ended wording of some recommendations in the Employment Accessibility standard. Respondents emphasized the need for clear definitions of terms like “undue hardship” and “reasonableness” in accommodation requests. Without these, employers may find ways to avoid additional costs by providing ineffective accommodations, or options that only address the legal bare minimum. Participants said that employers would not change their business practices in a meaningful way or willingly make additional investments. As such, there was a sentiment that the draft recommendations were not realistic and would not ensure an employee’s accessibility needs are met.

Other respondents argued the opposite, saying that businesses who followed the recommendations would be spending too much on employee accommodations and would require additional financial support through grants.

Recruitment

Recruitment was seen as one of the biggest barriers for employing people with disabilities. Many respondents emphasized the importance of accessible recruitment processes and accommodations.

They believed that training employers on accessible technologies and inclusive hiring practices is essential, saying that current hiring processes allow for implicit bias and decisions based on the outward presentation of candidates. Similar biases may also be formed towards those with unseen disabilities (e.g., social anxiety, ASD, ADHD).

Respondents stressed that employers need to ensure that accommodations are made throughout the hiring process. However, some respondents expressed concern about the recommendation to not require proof of a disability from an applicant. They felt that this could pose challenges in differentiating the needs of an individual from someone who does not need accommodations.

These concerns were balanced by those who supported the same recommendation. They observed that the difficulty of obtaining medical proof is already a burden for many people with disabilities, especially people with invisible disabilities (cognitive, neurodivergent, chronic, episodic, etc.).

Accommodations at work

Respondents urged for better communication for both employers and employees when it comes to accommodations at work. Overall, respondents felt that the standards could help employers to understand their obligations to provide suitable accommodations at work. They also emphasized that accommodation should be an ongoing process throughout employment, as a person's needs change over time.

Ideas that respondents shared included:

- **Workspaces:** regularly checking and improving both physical and digital workspaces. This includes ensuring easy access to washrooms, providing necessary equipment and making the workspace itself accessible.
- **Policies:** policies like flexible work arrangements, mental health supports, and the ability to work part-time or reduced hours. These policies were seen as essential and would help employees with disabilities thrive in their roles without exacerbating their conditions.
- **Remote work:** the continuation and expansion of remote work options were highlighted as crucial. Many respondents noted that remote work has been beneficial for disabled individuals, especially during the COVID-19 pandemic. They argued that jobs that can be performed remotely should continue to offer work-from-home arrangements to ensure a more inclusive workforce.

Built environment

Respondents discussed improvements that could be made to the physical environment in workplaces to make them more inclusive spaces. Some respondents who are immunocompromised highlighted their need for well-ventilated, clean air to prevent exposure to COVID-19 and other airborne diseases. Other environmental triggers for respondents included strong scents, enclosed spaces, bright lighting and sounds. If no such accommodations could be provided within the workplace, then an arrangement to work from home was their preferred option.

Other respondents mentioned that some workspaces may not be equipped with physical features such as ramps, particularly in older buildings. Respondents also noted that there must be ways to safely navigate the workplace during an emergency evacuation, such as visual signage or alarms.

Overall, respondents urged that the standard should consider the environmental needs of all workers with any physical, emotional or neurological disabilities.

Compliance and enforcement

According to many respondents, the draft recommendations in the standard can only be effective if they are monitored and enforced across the affected organizations. Respondents felt that a comprehensive approach would be needed to measure the standard's effectiveness, and to ensure its recommendations are fostering a more inclusive work environment.

Some ideas given for these activities included:

- **Monitoring:** a complaints system for inadequate or missing accommodations; provincial reporting of organizations and their accessibility measures; recourse for wrongful dismissals.
- **Penalties:** fines; corrective actions.
- **Incentives:** awards for organizations with exceptional accessibility policies; financial incentives for companies with accessibility standards in place.

Implementation

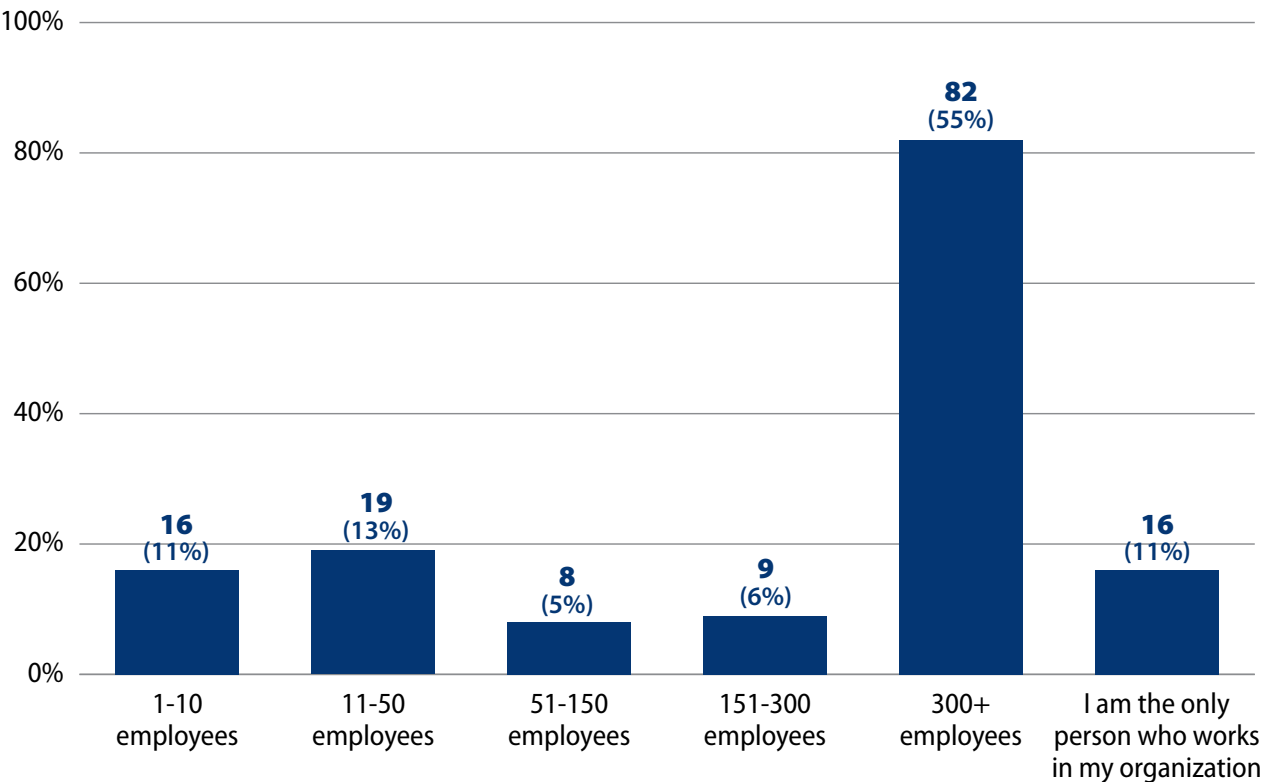
The survey asked several questions to determine how respondents felt about the process and feasibility of implementing the draft recommendations. Some considerations explored include:

Organization size

Respondents who indicated they were an employer or representative of an employer, a member of a government agency, or a member of a private sector organization or business, were asked for their input on implementation of the draft recommendations, based on the size of their organization. Organization sizes were defined as follows:

- 0-1 Employees: single-person organization
- 1-9 Employees: micro organization
- 10-49 Employees: small organization
- 50-99 Employees: medium organization
- 100+ Employees: large organization

Figure 2: What is the size of your organization?



Most of those respondents (55%) represented a large organization of 300 employees or more.

Overall, 71% of respondents felt that the draft recommendations in the service and employment standards are reasonable for all or most organizations to implement. However, it was frequently expressed that micro and small organizations should be allowed more flexibility in their uptake than large organizations due to resource constraints, particularly for costly physical infrastructure updates.

Timeline

All respondents were asked to share their input on a reasonable timeline to implement the draft recommendations based on organization size. There was little variation across organization sizes, with 59 to 65% of respondents expressing strongly that two years or less was enough time to meet these standards, and only 7.6% of respondents selecting “more than five years.” The biggest concerns included financial limitations of smaller businesses and “red tape” preventing immediate uptake in larger organizations. It was noted that a phased approach may make implementation easier for businesses of different sizes.

Note: Hundreds of respondents with disabilities felt that the question about implementation timelines downplayed how urgently these recommendations are needed for them to achieve basic access to services and employment. “ASAP,” “immediately” and other similar answers were expressed frequently. Part of this concern was the belief that organizations will take as long as allowed no matter what timeline is given, unnecessarily extending the length of the process.

Supports

Several key supports were identified that would aid organizations in the full implementation of the draft recommendations. Most frequently noted include:

1. **Funding:** financial support to make the recommended changes.
2. **Guidance:** direction from authorities or access to a trained consultant for guidance in implementing the recommendations.
3. **Information:** resources including templates, document supports and centralized communication around implementing the recommendations.
4. **Training:** training for employees, employers and leadership to understand the importance of the recommendations and how to implement them, particularly around ensuring appropriate accommodations for employees with disabilities.
5. **Tools:** hardware and digital tools to enhance accessibility in the workplace.
6. **Enforcement:** compliance measures to ensure that recommendations are met by all organizations.

Virtual Regional Town Halls

Participant Overview

Five public virtual town halls were hosted for participants from the following regions:

- Vancouver Island/Coastal Region (June 11, 2024)
- Mainland/Southwest Region (June 11, 2024)
- Thompson-Okanagan and Kootenay Regions (June 13, 2024)
- Cariboo and Nechako Regions (June 24, 2024)
- North Coast and Northeast Regions (June 27, 2024)

Key Themes

During each workshop, participants could provide comments about different areas of the draft standards recommendations.

The most common themes that emerged from the discussions were:

- Support employers with implementation
- Offer funding
- Give examples of accommodations (for the Employment Accessibility standard)
- Give standard definitions (for the Accessible Service Delivery standard)
- Provide training for employers
- Create education and awareness
- Engage with people with lived experience
- Create document templates for forms, policies, etc.

Implementation

Participants discussed the need for a detailed implementation timeline for the Accessible Service Delivery and Employment Accessibility standards, with flexibility for different organization sizes and existing resources. They initially suggested creating broad standards, then refining them for specific sectors. Quick wins could be achieved using readily-available resources and shared guidelines. Some examples are listed below:

- Implementation timeline must consider the type of standard. For example, local governments typically have a five-year budget cycle. If supplies must be ordered to implement, that can be built into budget.
- Smaller organizations should not be exempt, but alternative implementation could be made available to them. For example, access to a disability specialist who may not be on the permanent payroll.
- It can be challenging to dig into specific business needs and challenges. Set the standards broadly at first, and then dig into specific sectors.
- In some areas, legislation exists but regulations haven't been passed, and in those cases it's a longer timeline to implement standards incrementally.
- Some of the standards can be implemented using resources that already exist (for example, guidelines on accessible web pages and printed materials). If there was a shared "How to Get Started" document, every organization could begin to make progress.

Funding

A common theme throughout the virtual regional town halls was that there needs to be practical and financial support for organizations to implement accessibility standards. In time, these supports may be included in budgets, but currently, funding is essential to encourage participation and overcome obstacles.

Accommodations

Many people feel unprepared to offer accommodations, and providing multiple examples for each standard could help. Guidelines for effectively supporting candidates, such as those who are blind, are necessary. Templates and processes should be in place to ensure people without advocacy experience receive the support they need.

Employers should actively offer accommodations and make this information publicly available, as uncertainty can prevent people from participating fully. Communication about available accommodations in advance can help potential job applicants anticipate their experience in the job. Specific comments related to accommodations in the workplace include:

- Each standard could include multiple examples to show how they could impact people with a variety of experiences. For example, individuals who have a sensory disability and use a wheelchair.
- Templates or guidelines for the process about what employers should offer candidates would be helpful. People should not have to advocate for themselves to have their needs met.
- Employers and unions don't provide the information related to accommodations to employees. Employees want to do a good job and sometimes put up with not receiving adequate support or reasonable timelines.
- During provincial engagement with youth with disabilities, a major theme was that youth felt they didn't have capacity to pursue employment and maintain jobs. Too much uncertainty caused anxiety. They felt they didn't have enough information on employers' accommodation strategies to make the risk worth it for them. Anything an employer can do to communicate accommodations in advance would help people anticipate their potential experience as an applicant.
- Employers could include a list of accommodations that they have offered in the past.

Education, resources and definitions

Education and training are crucial for identifying and addressing barriers to employment for people with disabilities, and for implementing these standards. It is important to ensure there are tools and resources available to assist training and understanding. Specific feedback related to education, resources and definitions included:

- Teach youth as they are transitioning into adults. Many people with disabilities do not understand what happens to them after they turn 18. If employment is part of their dream, they will not understand what they can or cannot do unless there is education available about standards, processes and supports.
- With more robust and comprehensive examples, including a variety of disabilities, the standards could help educate employers about their responsibilities to creating accessible workplaces.
- There is a lot of learning taking place in the public sector, but there may not be as much focus on accessibility in the private sector. Education is required for businesses to become aware of the standards and regulations.
- To remove implicit attitudinal barriers, the entire organization needs to be trained. It is of no value to have an employee experience a barrier-free application process if they're going to experience barriers as an employee. This cannot fall to the HR and hiring department; the entire experience organization-wide needs to understand and implement the shift.

Sector Engagement



From July 3 to July 25, 2024, the Accessibility Directorate held a series of sector engagement meetings to collect input on the draft recommendations for the Accessible Service Delivery and Employment Accessibility standards.

Participant Overview

For the public sector engagement sessions, participants self-selected into the following categories:

- **Public Sector:** 60 participants from groups such as the City of Vancouver, City of Chetwynd, District of Kent, District of Central Saanich
- **Industry Associations and Businesses:** 15 participants
- **Labour Organizations and Unions:** 27 participants from groups such as CUPE BC, BCGEU, and TRU
- **Education Sector:** 58 participants.
- **Health and Social Sector:** 19 participants
- **Transportation Sector:** 12 participants
- **Organizations Serving People with Disabilities/Advocacy Organizations:** 46 participants
- **Accessibility Committees:** 27 people attended the first session, and the second session had 46 participants
- **Youth and Youth Serving Sector:** 10 participants, most of which were those working with youth
- **Equity Deserving Groups:** 16 participants

Key Themes

During sector engagement sessions, participants provided feedback on different areas of the new standards. The most common feedback themes were related to:

- Using precise definitions
- Compliance and enforcement
- Supporting organizations with implementation
- Offering funding
- Training for employers
- Central resources for employers
- Applying standards to all employers

Definitions

Participants recommended that key terms be thoroughly and precisely defined within the standards. By having clearer definitions, it will help businesses and people understand the standards and implement them throughout their organization. Some of the responses are highlighted below:

- Terms included in the standards need clear definitions, such as “undue hardship,” and “duty to accommodate.”
- Some of the expectations for implementation are too vague. For example, standards that say, “as long as possible,” “if it doesn’t cost too much” or “reasonable accommodation” do not provide clear direction.

Implementation

Participants expressed that the standards should be implemented promptly, as they largely reflect principles of fundamental human decency. There was also a desire for a phased implementation approach where larger organizations adopt the standards first, alleviating the burden on smaller organizations when they eventually implement them.

To facilitate this process, organizations can begin preliminary training immediately, establishing a baseline and reducing implementation barriers. Although smaller organizations may need some flexibility, the standards are intended to be straightforward and intuitive, focusing on common-sense practices such as effective customer service and basic respect for individuals.

Many participants also emphasized the importance of setting reasonable timelines for organizations to implement the standards. However, they advocated for a relatively short time frame to create momentum and drive forward the necessary changes efficiently.

Compliance and enforcement

Enforcement is necessary to ensure organizations comply with the regulations. Participants expressed the need for accountability mechanisms to hold employers responsible if they do not provide accommodations, effective training or adopt appropriate technology. There is a call for clear compliance measures and potential reprimands for non-compliant employers.

Funding

Throughout the sessions, participants emphasized that funding is essential for implementing the standards. Effective implementation also requires dedicated roles and resources to support businesses, especially small for-profit ones, in this transition. Consideration of funding cycles and budgets is necessary for timely implementation. Below are some examples of comments provided.

- Schools are commonly barred from grants because they are publicly funded.
- In schools there is limited time to train staff so it must be done after hours and outside of the classroom, which costs even more money.
- If the Province provides funding for organizations to hire dedicated staff for workplace and employment accessibility, implementation will happen much more quickly.
- Many businesses that are eager to implement the standards want to know if funding will be available to support them. Funding must be considered as a piece of implementation and timelines should consider funding cycles/budgets.
- Having a series of resources ready at implementation, along with pockets of funding, will help businesses get started. Small for-profit businesses have a hard time accessing grants in the ways nonprofits can.

Written Submissions



All people in British Columbia were invited to submit their feedback on the standards in writing or by video before July 31, 2024.

Participant Overview

Government received 13 written submissions from organizations across B.C., including:

- Municipalities
- Service authorities
- Public associations
- Non-profit organizations

Key Themes

General

Resources

Organizations consistently highlighted the need for practical tools such as checklists, guides, and centralized frameworks to ensure consistent application of standards. This was particularly emphasized by smaller organizations, which may lack internal expertise. There was also a strong call for dedicated funding, grants and human resources to support the effective implementation of accessibility standards.

Proportionality and scalability

Feedback frequently noted that accessibility standards should be proportionate and scalable based on the size and capacity of organizations.

Jurisdictional challenges for local governments

Local governments anticipate facing higher expectations for compliance due to their public funding, which might necessitate clearer guidance on how to prioritize actions, set timelines, and establish support systems. School boards also expressed concern with meeting the standards in a way that does not redirect their already limited resources.

Compliance and enforcement

Multiple respondents expressed concerns about the enforceability of the standards, urging the standards to use clear language on accountability, oversight and compliance mechanisms. There was also a suggestion for a centralized monitoring system that would conduct regular audits and offer feedback mechanisms to ensure compliance with the accessibility standards.

Communication

Effective communication around the standards is seen as crucial to ensuring that all organizations are aware of the new standards well in advance. Some respondents also suggested that comprehensive awareness campaigns be conducted to promote understanding and compliance with accessibility standards across the province. Some written submissions expressed concern over the administrative and financial burden of offering multiple communication channels and suggest offering this on a case-by-case basis instead.

Documentation

Guidance was requested on developing scalable documentation processes to meet compliance requirements. This includes clarity on what documentation is necessary and how it should be maintained by employers and businesses.

Alignment and consistency

Respondents stressed the importance of aligning provincial standards with those of other Canadian jurisdictions or existing statutory requirements to avoid creating additional burdens for businesses operating in multiple regions. Respondents also recommended referencing or developing external technical guidelines to support consistent implementation across municipalities and other organizations.

Implementation

Respondents highlighted that implementing the new standards will demand considerable time, resources, and staffing. They recommended a phased approach over at least two years and staggered timelines tailored to organizations of varying sizes. Additionally, respondents emphasized the need for the government to offer sufficient support, including meaningful incentives and significant funding, during the implementation phase. They also suggested creating sector-specific standards or sections of the standards to better suit organizations of different types. Where possible, the committee requirements should specify local representation to ensure “on-the-ground” knowledge is included.

Accessible Service Delivery

Tensions with existing standards

Respondents noted potential conflicts between the proposed standards and existing building codes and accessibility legislation, urging close integration to avoid duplication and confusion. One example is the introduction of a new interpretation of duty to inquire, which may cause confusion if it differs from what is already established by the BC Human Rights Tribunal and case law.

Built environment

Respondents noted that many businesses are tenants and do not maintain their own physical spaces, indicating that the standards should address this specific situation in infrastructure update recommendations. Feedback therefore suggested that the management of aspects regarding the physical environment be accomplished through amendments to the B.C. Building Code instead. Respondents also felt that this recommendation may take the longest and that a phased approach would be appropriate to allow organizations of all sizes time to meet occupational health and safety requirements, building and fire code requirements, and permitting to make alterations.

Documentation and evidence

Feedback highlighted that the documentation requirements are vague and may impose significant burdens. Respondents also indicated that the guidelines around evidence are unclear, which may make implementation difficult and uneven. For example, the phrase “a lot of time or money” is undefined.

Training

Feedback pointed out the substantial costs associated with training. Respondents suggested that more detailed examples or guidelines would help businesses understand how to meet this standard. Concerns were also raised about the lack of clear guidance on the role and responsibilities of accessibility representatives.

Accommodations

Respondents expressed concerns about the vagueness of terms such as “a long time,” which could lead to high costs and lengthy implementation of accessible features. Feedback also highlighted that the standard may deter businesses from providing accessibility features due to increased administrative burdens, especially for tenant businesses where maintenance is controlled by landlords.

Examples of accommodations requested in the written feedback include providing clean, indoor air for immunocompromised people and available public bathrooms in all service spaces to ensure dignity for people with conditions that cause incontinence (such as Crohn's and colitis). Their feedback made clear that customers should not have to disclose or prove their disabilities to receive accommodations.

Service disruption

Respondents noted that the standard is unclear about acceptable notification methods for service disruptions. Suggestions included specifying whether signage or other methods are acceptable and clarifying the responsibilities of tenants versus landlords. Feedback also indicated that the guidelines for communication are too vague, particularly concerning social media. Respondents suggested addressing the significant costs and potential inequities between businesses in ensuring accessibility across different platforms.

Self-service devices

Feedback suggested aligning with Ontario's standards to avoid onerous costs and operational impacts. Concerns included addressing information security issues and clarifying requirements for alternative options and descriptions. Communication around accessible alternatives must be available when self-service devices are undergoing repair.

Guide dogs and service animals

Similarly, feedback suggested aligning with Ontario's and Manitoba's standards and being clear about accommodations for emotional support animals. It was also requested to remove guide dogs and service animals as an example of an accommodation, as this is a blind person's right.

Employment Accessibility Standards

Compatibility with existing frameworks

Concerns were raised that some employment standards could conflict with existing human rights jurisprudence, creating uncertainty. Respondents advised consulting with a labour lawyer to ensure these standards align with existing laws. They also recommended integrating these standards into existing statutory frameworks like the Workers Compensation Act and the Human Rights Code, rather than making them standalone requirements.

Flexibility

It was recommended that some flexibility is intentionally built into the standards to allow for individualized application that is place-specific. For example, creating policies in collaboration with local accessibility committees. Regarding employment flexibility, respondents recommended that standards more clearly address hybrid and flexible work options.

Tools and technology

Respondents raised concerns about potential bias in artificial intelligence tools and emphasized the need for employees to understand how to use accessibility settings. They stressed that technology should not perpetuate harm or discrimination, nor relieve organizations of their responsibility to accommodate employees with disabilities. There is support for ensuring the availability of tactile or protactile interpreting, intervenor services, captioning and the provision of technology for an accessible work environment. Respondents are supportive of specific standards that ensure virtual workspaces are accessible and that employees are reimbursed for the purchase of assistive devices.

Emergency response

Feedback suggests that accessibility in emergency response is too significant of a topic to be covered just as one aspect of this standard. Other concerns were also raised about the costs and challenges of aligning general emergency response systems with individual accessibility needs. Respondents highlighted the importance of tailored emergency plans.

Recruiting and onboarding

Respondents highlighted potential issues with collective bargaining agreements for unionized employers, particularly around the requirement for businesses to provide accommodation ideas. There also were concerns that onboarding materials could be onerous and costly, with uncertainties about whether these accommodations apply only in B.C. or nationwide. However, some respondents expressed support for offering accessible onboarding materials without individuals needing to make a request.

Also related to recruitment, respondents suggested that the standards incorporate accessibility considerations for external contractors. Participants also felt that more detail about accommodation and accessibility practices are needed in job descriptions.

Communication

Ensuring all employee communication is accessible was identified as complex and potentially burdensome, especially for large employers. The timeline for implementation was deemed too short, and there was concern about the impact on small businesses that might not have employees who require accommodations.

Training

Feedback indicated that mandatory training obligations could be costly and burdensome, with a longer implementation timeframe needed. There were concerns about the accessibility of materials from outside suppliers, and respondents suggested that the B.C. government should provide all mandated training in accessible formats. While people with disabilities are the experts of their own experience, participants felt that a defined training curriculum would aid with monitoring and compliance.

Leave, benefits, and compensation

Feedback indicated potential impacts on unionized workplaces, with suggestions to ensure that employees with disabilities have equal access to plans or reasonable alternatives.

Inclusion

Respondents recommended that the standards explicitly address discrimination towards people with intersecting identities, not just regarding ability. They also called for an inclusive workplace strategy to increase representation of diverse identities.

Definitions

There were concerns about the wording used to describe accommodations in the standards, such as the use of the word “choose” in certain areas, which was flagged as implying that accessibility needs are voluntary for people with disabilities. Respondents also suggested that the term “undue hardship” be clarified as it could vary greatly between businesses. Lastly, respondents suggested that multilingual solutions be incorporated into the standard, such as providing guidance on Google Translate widgets and making feedback, documentation and reporting available in multiple languages.

Invisible disabilities

Respondents requested more examples and evidence of consideration for non-apparent disabilities to be included. For example, dyslexia can have its own unique barriers for employees due to the difficulty in acquiring diagnoses. Participants also advocated for accommodations for Crohn’s and colitis, specifically accessible bathroom access near workstations or the flexibility to work from home.

Overall, the written feedback highlighted general support for the draft recommendations but flagged concern around lack of detail. There is a desire to see greater integration with existing statutory requirements to avoid confusion and duplication. Respondents acknowledged the significant commitment for organizations to undertake these changes and requested clear guidance and provision of resources to ensure clear comprehension and smooth uptake. There is an opportunity to be clearer with language in general and explicitly outline considerations for diverse types of disabilities.

Community-Led Sessions



Organization and Participant Overview

35 organizations across B.C. delivered a total of **80** community-led engagement sessions to gain feedback on the draft standards.

A total of **1,102** people from diverse audiences attended the engagement sessions, including:

- Urban and rural populations
- Disability-specific groups, including participants with intellectual and developmental disabilities, physical disabilities, neurodivergent individuals, and those with multiple disabilities
- Cultural and ethnic communities
- Newcomer communities
- Indigenous communities
- Advocacy and support groups
- Student associations

Key Themes

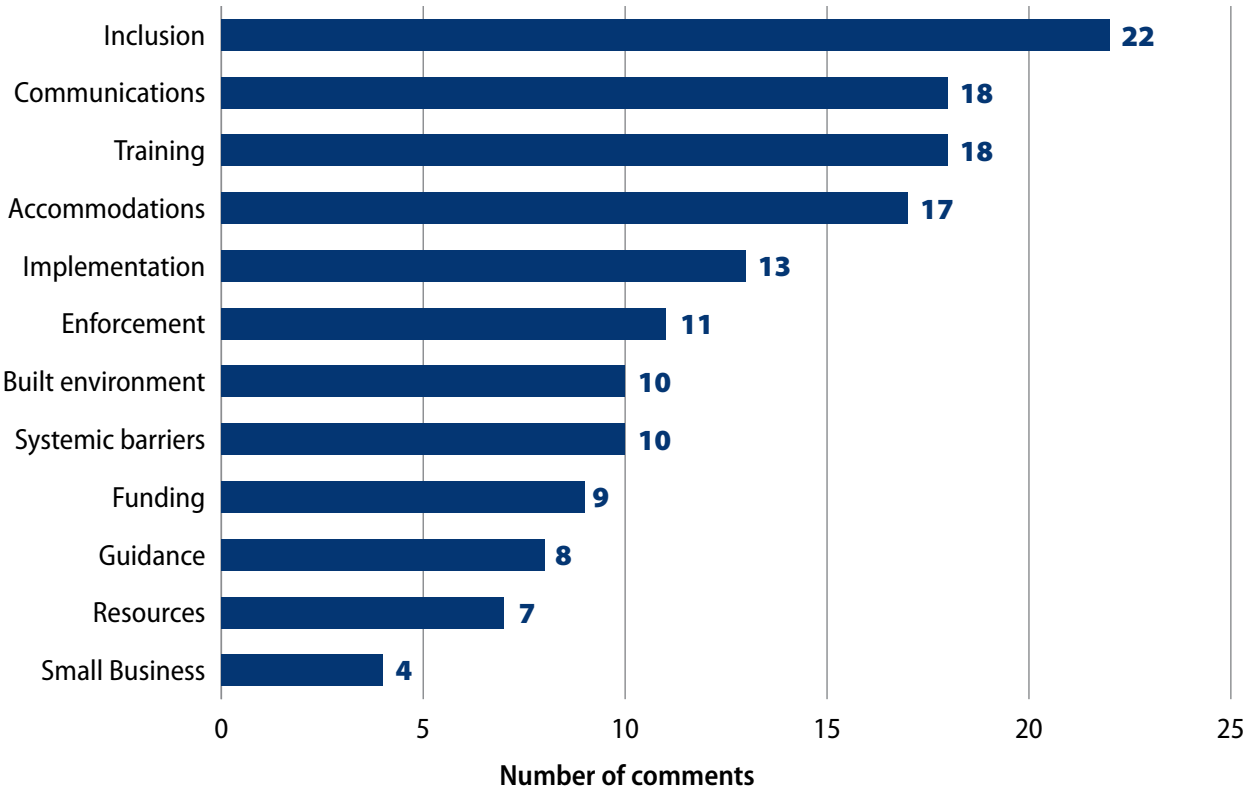
Organizations that facilitated the community-led sessions were asked to submit a report that summarized their feedback. The feedback received was largely consistent with key themes across other engagement methods, with some targeted feedback particular to specific disabilities.

Accessible Service Delivery

Feedback on the Accessible Service Delivery standards was generally supportive across the engagement sessions, with most questions and concerns relating broadly to specificity to ensure the standards suit the needs of all people with disabilities. Key themes include a desire for clear communication, proper training, and effective enforcement to implement the recommendations. There is also an emphasis on ensuring that people with various types of disabilities are considered and included in the standards.

A significant amount of feedback was given regarding specific types of accommodations and the built environment.

Figure 3: Top themes from community-led engagement on Accessible Service Delivery standards



Inclusion

Inclusion was a top theme across all engagement session reports, which was consistent with feedback expressed by people with disabilities through other engagement methods. There is a strong desire to include as many people with disabilities (and their accommodation needs) as possible in the development process of the standards as well as the considerations of the standards. Participants felt that this meant centering people with disabilities as experts, giving them decision-making power, and when possible, paying for their expertise.

Several groups noted specific demographics they would like to see addressed in the standards, including:

- Youth and children with disabilities
- Newcomers and immigrants with disabilities
- Individuals with autism
- People with disabilities for whom English is not their first language
- People with intellectual, developmental or physical disabilities
- Indigenous People with disabilities
- Individuals with vision loss
- Individuals who are Deaf or hard of hearing
- People with spinal cord injuries
- People with disabilities who live in rural communities

Accommodations

Many participants were people with disabilities or represented an organization that serves people with disabilities, and therefore specific accommodations were a major theme in the sessions. Accommodation suggestions for the Accessible Service Delivery standards included providing stipends for American Sign Language (ASL) interpreters, requiring visual cues for people who are deaf or hard of hearing people, audible cues for people who are blind, and consideration of overwhelming/loud sensory public environments.

Feedback about the inclusion of assistive tools and communication devices in the draft standards was positive. The point was made several times that although accommodations are essential, people should not be forced to disclose or prove their disability. Accommodation suggestions related to successful implementation of the standards include offering resources or implementation support in multiple languages and ensuring plain language or alternative communication formats. Participants noted that the Chinese translation of the draft standards was poorly translated and missing key examples present in the English version.

Built environment

Participants provided significant feedback about barriers that exist in the built environment including bathroom stall size, braille signage, elevators, ramps, and visual challenges such as using a restaurant drive-through. The sessions identified several ways that the built environment could be more accessible through the Accessible Service Delivery standards such as by providing accessible bathroom equipment (i.e. adult change tables, lifts) and easy-to-press automatic doors. Self-service options are also seen as important to ensure that services are accessible for a variety of access needs. Where technology and built environment overlap, regular machine monitoring and evaluation is recommended to ensure features are reliably available.

Another common sentiment was that lack of information around the built environment makes navigating public space and services difficult. Suggested solutions include incorporating clear accessibility statements on websites, as well as visual tools like maps, floor plans, and virtual tours. These resources would help users understand the layout and accessibility features of a building before visiting.

“For self-service, it is crucial to have effective help options, ensure machine maintenance, and consult people with disabilities when purchasing new equipment.”

– quote from participant

Communication

Feedback on communication in accessible service delivery emphasized the importance of using clear, inclusive language and providing multiple ways for people with disabilities to access information. Participants felt that the original standards summary language was too weak and suggested that providing the full document to the public would have allowed for better assessment of its effectiveness.

There was a strong call for public awareness and education about disabilities, starting from an early age, and ensuring information is accessible through plain language versions, videos, and alternative formats. Participants highlighted the need for varied communication channels, such as email, phone, chat, and video calls, to accommodate different preferences. Among the suggestions was a simple question such as, “do you have any accessibility needs?” that would be helpful in identifying specific needs in service settings. Additionally, the idea of recognizing people with disabilities as experts in their own experiences was positively received but participants recommended that it be reframed to “believe people with disabilities” to emphasize proactive leadership.

Training

Feedback highlighted the need for robust, culturally sensitive, and ongoing training to ensure service providers can effectively support people with disabilities. Participants noted the challenges faced by small or rural organizations that may lack resources for proper training, especially without additional support. There was a strong call for general training on accessibility, including understanding invisible disabilities and the cultural nuances in how disabilities are defined and communicated. Tailoring training to the experiences of newcomers and Indigenous communities was seen as crucial, with a particular focus on trauma-informed practices, empathy and cultural competency.

While emphasizing the importance of hands-on training from individuals with lived experiences, participants suggested that such approaches could better educate staff on accessibility and barrier removal. The need for standardized, documented training—updated annually—was also underscored. Investment in community-specific training programs was recommended to create more inclusive practices, rather than relying solely on formal qualifications.

Implementation

Feedback on the theme of implementation highlighted the need for tailored, collaborative approaches to ensure successful adoption of accessibility standards by service providers. Participants stressed the importance of clear guidance and resources to help organizations prioritize compliance tasks based on expert recommendations. Concerns were raised about statements suggesting that organizations only need to provide accommodations if costs are minimal, which could undermine the duty to accommodate under the B.C. Human Rights Code. A three to five-year timeframe for implementing accessibility standards was recommended by one participating organization, recognizing that significant time is needed to organize and execute changes, “similar to starting a business.”

Participants emphasized that government entities and organizations share responsibility for implementing accessibility policies. They suggested involving advocacy groups and individuals with disabilities in the review process to ensure that lived experiences are meaningfully integrated. There were specific concerns about challenges for small, micro and single-person organizations in meeting compliance requirements, underscoring the need for government support to alleviate undue burdens. Lastly, investments in infrastructure, including internet access and technology integration, were seen as critical for equitable access in rural or remote areas.

Funding, guidance and resources

Related to implementation are the connected themes of funding, guidance and resources. These specific supports are seen as essential by participants to make implementation equitable and achievable across organizations of different sizes and in rural areas. The theme of funding was mentioned most frequently, indicating strong approval for allocating financial resources to help services incorporate the standards more quickly. Guidance was also mentioned often, marking a desire to see a clear outline for what is expected to reduce confusion and enhance uptake. Resources refers to the necessary materials, expertise and information to implement the standards. One group suggested providing Standard Operating Procedures (SOPs) and templates to reduce the burden on businesses.

“Small businesses require financial support and clear guidance to meet accessibility standards without undue burden.”

– quote from participant

Compliance and enforcement

Feedback on compliance and enforcement stressed the need for a tiered approach, allowing smaller businesses more time to meet accessibility standards while ensuring accountability. Participants highlighted concerns about the challenges of enforcing standards, calling for clear oversight mechanisms, realistic timelines and defined accountability roles. Stronger enforcement was suggested, including the creation of regulatory bodies for physical and virtual environments, and implementing financial consequences for non-compliance.

Participants expressed frustration with current feedback systems, feeling that complaints often went unaddressed. To improve this, they recommended transparent processes where concerns are acknowledged and tracked, with regular updates on actions taken. Emphasizing the importance of mandatory accessibility for all businesses, they noted that both physical and virtual spaces must be fully accessible, including features like audio descriptions, braille and accessible emergency plans. The need for government oversight and the appointment of an accessibility officer were also highlighted to ensure compliance.

Systemic barriers

Participants highlighted several systemic barriers to accessible service delivery, including limited access to ASL interpreters and overall societal stigmatization of people with disabilities. One group suggested including a diversity clause in the accessible service delivery standards. Discrimination based on disability and Indigeneity was a significant concern, and many stressed the need for standards to address these broader issues with cultural sensitivity. Attitudinal and social barriers, such as misunderstandings of hidden disabilities and insensitive language, further hinder accessibility.

Participants emphasized the importance of allowing individuals to express their needs freely and establishing clear processes for addressing those needs as they arise. The shortage of registered ASL-English Interpreters in British Columbia and across Canada was identified as a critical gap, with no provisions in the standards for expanding this essential workforce.

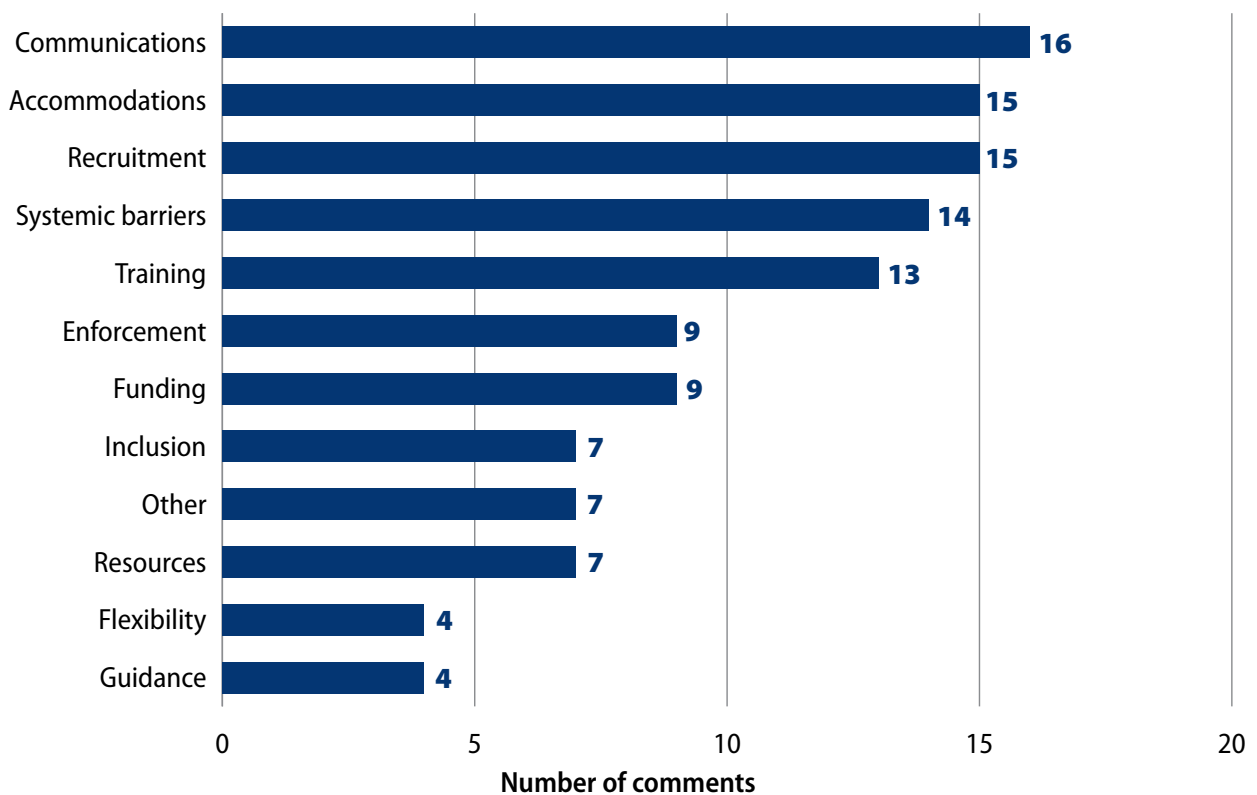
Transportation

One area of feedback not reflected in the top themes was the common mention of public transportation. Many participants expressed experiencing transportation barriers, including trouble with street features and design, which hinders equitable access to services for people with disabilities.

Accessible Employment Standards

Feedback on the Accessible Employment standards generally expressed support for the recommendations, with many considering the standards to be a strong framework for improving employment accessibility. However, much of the feedback also communicated concerns regarding ongoing stigma and discrimination, particularly throughout recruitment and hiring, that the standards could go further to address. Other common themes included a call for clearer communication, comprehensive training to support the standards, specific workplace accommodations that should be included in the standards, and a call for a clear system of monitoring, compliance and enforcement.

Figure 4: Top themes from community-led engagement on accessible employment standards



Recruitment

Much of the feedback related to the Accessible Employment standards related to recruitment and hiring. Many participants expressed concerns about ongoing discrimination in hiring practices, with a fear of rejection when disclosing their disabilities being common. In one session, many participants reported they had “never personally seen or experienced inclusive hiring processes or accommodations in employment settings.”

Participants expressed that accommodations and support are required throughout the entire recruitment and hiring process, from job hunting through to interviews and onboarding/orientation. The feedback also emphasized that accommodations should be offered to all applicants, without requiring proof of disability. Examples of accommodations included receiving interview questions in advance, flexible interview formats, and multiple communication methods being made available (email, phone, video conferencing).

Another common sentiment was that recruitment should focus on “skills, rather than rigid requirements that could be accommodated.” Many common criteria in job requirements can automatically exclude applicants with disabilities, for example, the need to lift certain weights or have a particular driver’s licence. It was suggested that these criteria be removed when they are not essential to the position. Participants expressed that these non-essential requirements and inadequate accommodation of disabilities means there are limited opportunities available to people with disabilities. Some participants noted that while minor accommodations are sometimes available, more complex needs are particularly underrepresented in the workforce.

Several organizations also reported a need for clear, comprehensive and transparent communication throughout the recruitment and hiring process. For example, job descriptions should include clear accessibility statements supported by concrete examples of accessibility in action, including detail on what accommodations are available. Several participants noted that, without this detail, statements around accessibility can feel inauthentic.

Communication

Another common theme in the feedback was the need for clear, transparent communication related to the standards themselves and throughout hiring and employment. Some participants noted that the information presented in the standards was too complicated or hard to follow (particularly for those with developmental disabilities), or not clear enough to support implementation. Participants expressed concern over the wording of “to the point of undue hardship, employers need to identify, remove and prevent barriers to accessibility.” Without a definition of “undue hardship,” participants worry employers will be able to prioritize costs over full and effective implementation of the standards. Many participants suggested that all statements reducing the obligations of employers or organizations due to financial costs be removed.

Participants expressed that organizations should publish comprehensive information about their accessibility measures. This includes what accommodations are available and how to request them. Participants also noted that many people with disabilities, especially those with additional language barriers, face communication barriers. This feedback emphasized the importance of using clear, inclusive language, and providing multiple ways to access information, such as through translated materials or translation services, accessible digital formats, visual and audio information, braille and sign language.

Systemic barriers

Discussion around broader, systemic barriers was a common theme across focus groups. Many participants reported having experienced discrimination during employment, particularly during hiring and onboarding. A common sentiment was that “a sense of shame or stigma was attached to asking for accommodations,” often leading to accommodations not being made and needs not being met. Many participants also reported that they hid their disabilities or avoided disclosing them out of fear of discrimination or job loss. These discussions emphasized that policies alone are not enough to create inclusive workplaces. Practical implementation of policies and standards often falls short without the associated cultural shifts within organizations.

“Even with the accessibility standards in place, there will always be stigma as a barrier.”

– quote from participant

Training

A common theme throughout the discussions was the need for comprehensive training on how to implement the standards and create inclusive work environments. This training was considered critical for ensuring organizations can effectively recruit, hire, support and retain people with disabilities. Participants expressed that this training should be mandatory for both employers and employees, and should be catered to diverse learning styles.

The importance of this training addressing a broad range of disabilities and accessibility needs was emphasized. Specific examples that were discussed included physical and cognitive disabilities, translation needs for those with language or communication barriers, and meeting the needs of hard of hearing people. To ensure the training is comprehensive and effective, participants suggested that training support and resources be made available to employers, specifying who will be trained, where, when and how. Another suggestion was for training to potentially involve external experts, to ensure accommodations can be tailored to diverse needs.

Accommodations

Discussion around workplace accommodations stressed the importance of flexibility in work arrangements. Remote work and flexible hours were frequently highlighted by participants as one of the most impactful accommodations for many people with disabilities, especially those with chronic conditions or fluctuating health.

“Remote work often eliminated many physical barriers, such as inaccessible office buildings or transportation challenges.”

– quote from participant

Modified workstations, job-sharing and flexible time off were also suggested as important accommodations to include in the standards. Specific examples included adjusted sick days to accommodate complex health needs and leave to accommodate a blind person taking time to train a new guide dog. Participants also emphasized the importance of accommodations being tailored to individual needs, and not assuming one size fits all. For example, people who are hard of hearing have varying levels of hearing loss, so need different accommodations.

“Offering personalized accommodation ensures that everyone’s unique needs are met, enhancing their overall experience.”

– quote from participant

As mentioned above, participants expressed that accommodations should be offered to all applicants throughout the recruitment and hiring process, without requiring proof of disability. Examples of accommodations included receiving interview questions in advance, flexible interview formats and multiple communication methods being made available (email, phone, video conferencing).

Participants also repeatedly called for employers to offer accommodations as part of the workplace and job structure itself, rather than requiring employees to request and advocate for their needs. The physical, mental and emotional labour of requesting accommodations was described as overwhelming and exhausting, leading to reduced job satisfaction and in some cases, the decision to leave the workforce entirely.

Compliance and enforcement

While many participants felt the standards provided a strong framework for improving employment accessibility, they emphasized the need for clear guidance around compliance and enforcement to ensure the standards are upheld. There were calls for regular monitoring of organizations of all sizes and continuous review and documentation of accessibility related issues to hold workplaces accountable. It was noted that compliance-based evaluation should prioritize the quality and inclusivity of services and accommodations, i.e. how well accessibility needs are met, rather than the size of the organization.

Some participants also expressed concerns about repercussions or job loss when filing complaints or reporting noncompliance with the standards. They suggested a neutral third party be involved in the monitoring system. As well as enforcement through fines or penalties, some participants suggested positive incentives to encourage businesses to improve their accessibility practices. For example, financial incentives like tax breaks, grants and subsidies could be awarded to proactive and exemplary organizations. These positive incentives could be particularly helpful for smaller organizations who may otherwise lack the resources to invest in significant accessibility upgrades. Stricter enforcement and penalties were considered more suitable for larger corporations.

“Accessibility must be treated as a core responsibility, not just something done to avoid legal penalties.”

– quote from participant

Engagement Feedback

In the survey, respondents were asked for feedback on how best to accommodate the diverse needs of people living with disabilities in the engagement process. Other engagement methods also received feedback on the execution of the engagement for the draft standards.

This feedback highlighted:

- **Meaningful outreach:** a common theme was that the survey was not distributed in enough targeted places to reach a diverse or large enough selection of individuals with disabilities. Respondents felt that greater effort could be made to connect with people with disabilities across the province, through spaces and/or services they already frequent. Respondents also requested early opportunities to contribute to the standards before they were drafted.
- **Accessibility:** several respondents highlighted that engagement methods must be as accessible as possible, using plain language and avoiding jargon or being too text heavy. The time-out limit on the survey platform was also flagged as a barrier.
- **Variety:** feedback emphasized the importance of offering a variety of engagement opportunities, including one-on-one interviews and in-person group discussions.
- **Feedback:** in drafting future standards, respondents suggested having multiple opportunities for feedback throughout the engagement process, both on the standards and the engagement itself.

➤ **Cultural Sensitivity:** as part of the survey, respondents were asked to share their thoughts on how to consider the unique cultural and geographic diversity of Indigenous communities in the engagement process. Key considerations included:

- The importance of speaking to members from different Indigenous groups to gain diverse cultural perspectives.
- Making meaningful effort to gain Indigenous feedback through engagement processes, with care to uphold cultural protocol.
- Acknowledging the perspectives of on- and off-reserve populations.
- Combating stigma and racialization, and using a trauma-informed lens.
- Offering tailored implementation support to Indigenous communities as they undertake the recommendations.

Additionally, feedback from the community-led sessions flagged that engagement and reporting deadlines should aim to avoid time conflicts with Indigenous hunting and harvesting seasons, annual community events and other significant cultural activities. For example, the community-led session reporting deadline was on September 30, the National Day for Truth and Reconciliation. Multiple Indigenous organizations who facilitated the sessions flagged this as a cultural sensitivity concern.

4.0

Next Steps



Input from this engagement will be used to help shape standards recommendations that the Provincial Accessibility Committee will bring to the Minister of Social Development and Poverty Reduction in 2025. These recommendations will form the basis of future accessibility regulations in B.C. The Accessibility Directorate will share feedback relevant to other government programs with the designated ministries.



BRITISH
COLUMBIA