British Columbia's
**Office of the Human Rights
Commissioner**

Accessibility at BC's Office of the Human Rights Commissioner

Report | 2023

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REPORT | DECEMBER 2023

BCOHRC recognizes the important relationship between protecting the natural environment and protecting human rights. One way we reduce our environmental impact is by limiting print copies of our reports. However, if you have difficulties reading this report in its electronic format, you are welcome to contact our office to request a printed copy.

This publication can be found in electronic format on the website of British Columbia's Office of the Human Rights Commissioner: bchumanrights.ca/accessibility-report-2023
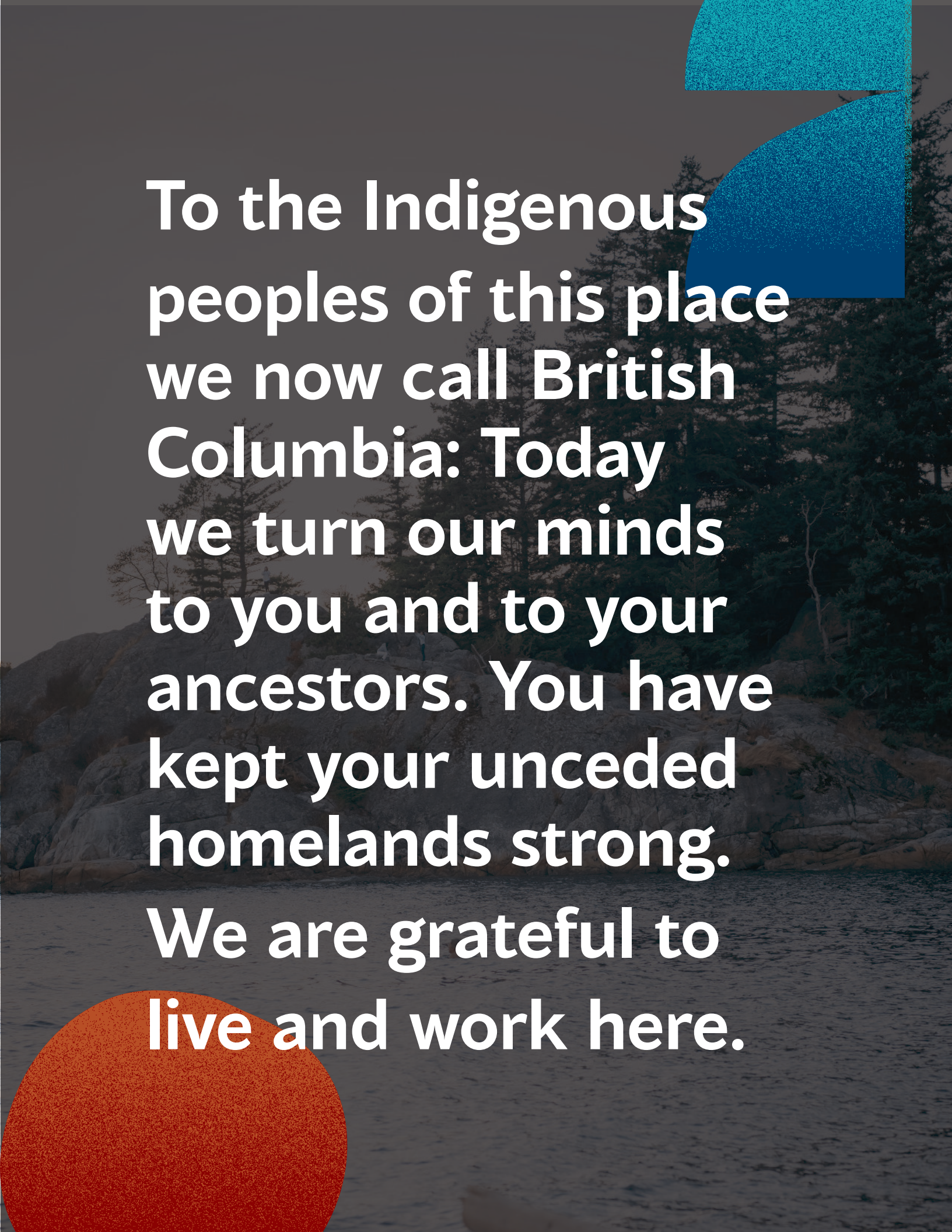
To the Indigenous peoples of this place we now call British Columbia: Today we turn our minds to you and to your ancestors. You have kept your unceded homelands strong. We are grateful to live and work here.

Accessibility at BC's Office of the Human Rights Commissioner

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If you are unsure about terminology used in this report, we invite you to visit our Human Rights Glossary at: bchumanrights.ca/glossary

Introduction

About BC's Office of the Human Rights Commissioner

In 2018, changes to B.C.'s *Human Rights Code* established the Human Rights Commissioner as an independent officer of the Legislature. The Commissioner is the first independent Human Rights Commissioner in our province's history.

BC's Office of the Human Rights Commissioner (BCOHRC) exists to support the Commissioner in addressing the root causes of inequality, discrimination and injustice in our province by shifting laws, policies, practices and cultures. BCOHRC does this work through education, research, advocacy, inquiry and monitoring. Its vision is a province free from inequality, discrimination and injustice where we uphold human rights for all and fulfil our responsibilities to one another.

Accessibility statement

This report is accessible to PDF Universal Accessibility (UA) standards. If you require an alternative format or would like to report errors or give feedback, you can contact BCOHRC at info@bchumanrights.ca or 1-844-922-6472.

Acknowledgement of key contributors

We would like to thank the following organizations for their support in developing our accessibility plan and this report.

- BC Aboriginal Network on Disability Society
- Disability Alliance BC
- Terrace and District Community Services Society
- Third Space Charity
- Victoria Disability Resource Centre

We would also like to thank the members of our internal BCOHRC Accessibility Working Group for their efforts in coordinating the creation and review of our accessibility plan and this report. We also thank the Accessibility Committee, which comprises members of several independent offices of the Legislature, for their review of this report.

Our plan was developed based on the thorough guidance provided by Disability Alliance BC in their 2023 document, "Developing your first accessibility plan: A guide for BC prescribed organizations."

A note about language

Language preferences can be highly personal and vary from community to community and person to person. In this document we alternate between person-first and identify-first language to reflect this diversity. BCOHRC is guided in our language choices by our Rights Based Language Guide, which asserts that individuals should be able to refer to themselves using the terms they prefer wherever possible.

Message from the Commissioner

Accessibility is essential to the project of human rights. At BC's Office of the Human Rights Commissioner, we know accessibility is not only integral to realizing our mandate but is also fundamental to a human rights approach overall. Accessibility is not merely a checkbox to be ticked.

As outlined in Article 9 of the UN Convention on the Rights of Persons with Disabilities, the identification and elimination of barriers to accessibility are crucial to enable people with disabilities to live independently and participate fully in all aspects of life.[1] Recognizing that, my Office is taking proactive measures to ensure information, services and physical and digital spaces are accessible to all people in British Columbia.

One of the highlights of our recent work is the #RewriteTheRules campaign launched in Fall 2022. Developed in collaboration with disability representative organizations, the campaign encouraged participants to contemplate how buildings, information, equipment, schedules and conventional practices can inadvertently create avoidable barriers for disabled people. It underscored the significance of dismantling barriers in spaces, systems and attitudes that hinder people with disabilities, serving as a call to challenge everyday ableism.

Broadly aligning with the principles of the 2021 *Accessible British Columbia Act*—namely, inclusion, adaptability, diversity, collaboration, self-determination and universal design—our approach guides our initiatives. Further details about each principle can be found in the pages that follow.

Within this report you will also find a detailed account of our work to improve accessibility—both within our organization and in how we further our mandate in community. I invite you to explore the tangible steps we have taken and continue to take to ensure our work is as inclusive and equitable as it can be. We are committed to creating an organization and a society where accessibility is a lived reality for every individual.

Sincerely,

Kasari Govender

B.C.'s Human Rights Commissioner

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[1] https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-9-accessibility.html

What is meant by accessibility?

Accessibility is the practice of making information, activities or environments sensible, meaningful and usable for people with disabilities and for those who may not consider themselves disabled but nevertheless encounter barriers.

Practically, this work can take many forms and range from installing ramps for wheelchair users at the entrance of a building to using artificial intelligence technology to support people with visual impairments to navigate unfamiliar surroundings.

Accessibility legislation in British Columbia focuses on supporting access for disabled people. In the *Accessible British Columbia Act,* disability "means an inability to participate fully and equally in society as a result of the interaction of an impairment and a barrier."[2]

A barrier is anything that prevents a person from fully taking part in all aspects of society. There are many types of barriers that B.C. residents with disabilities face; some examples are physical structures, poverty, lack of access to computers and attitudinal barriers. Attitudinal barriers include negative societal perceptions of disability and biases relating to other identities that a disabled person may have, including those rooted in colonialism, racism and gender identity and sexuality.

Accessible and inclusive design requires conscious and deliberate effort to understand and analyze different barriers to access. Once we gain that understanding, we must use it to design services and facilities that can be accessed by everyone, regardless of ability.

Accessibility committee

BCOHRC has joined other independent offices of the Legislature in the province to form a Joint Accessibility Committee. The purpose of the Committee is to advise the offices in their efforts to identify, remove and prevent accessibility barriers to any individuals in or interacting with the offices and to assist the offices with meeting their obligations under the *Accessible British Columbia Act*.

The members signed a Memorandum of Understanding in August 2023 that lays out the Committee's responsibilities. Primarily, the Committee will support each of the member offices in identifying barriers, identifying potential mitigating actions and consulting on each member office's accessibility plan.

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[2] https://www.bclaws.gov.bc.ca/civix/document/id/complete/statreg/21019#section1

In establishing the Committee, the following criteria from section 9(2) of the *Accessible British Columbia Act* were used:

The Committee shall have a maximum of 11 members, including at least one employee from each of the Offices. The Committee shall, to the extent possible, be composed as follows:

(a) at least half of the members are

(i) persons with disabilities, or

(ii) individuals who support, or are from organizations that support, persons with disabilities;

(b) the members reflect the diversity of persons with disabilities in British Columbia;

(c) at least one of the members is an Indigenous person;

(d) the Committee reflects the diversity of persons in British Columbia.

If you would like more information about the Joint Accessibility Committee, contact BCOHRC by emailing info@bchumanrights.ca or leave a message at 1-844-922-6472.

Member offices:
- Office of the Ombudsperson
- Office of the Auditor General
- Office of the Representative for Children and Youth
- Office of the Police Complaint Commissioner
- Office of the Merit Commissioner
- Office of the Information and Privacy Commissioner
- Office of the Human Rights Commissioner

Accessibility working group

The work of developing, implementing, evaluating and reporting on our Office's accessibility plan is coordinated by BCOHRC's internal Accessibility Working Group.

Participation in this working group is voluntary and the individual identities of members are confidential. The group is made up of representatives from several BCOHRC departments, including Education and Engagement, Legal, Communications and Operations. The working group is diverse and includes staff with varied intersectional identities relating to disability, race, Indigenous identity, sexual orientation, gender identity and family status, among others.

Our accessibility story so far

From the very beginning, accessibility has been one of BCOHRC's guiding principles. This section addresses existing accessibility practices at BCOHRC. These are built into the development of our educational materials, the construction and maintenance of our physical environment, the creation and dissemination of our external communications, our recruitment practices and our public campaigns. We know that accessibility of information, space and services is essential to the realization of human rights. Our work is designed for a range of abilities, cultures, languages, education levels, learning styles and viewpoints.

External engagements

When engaging with people in British Columbia, we have worked to ensure accessibility in the ways we work and in what we deliver. This includes, but is not limited to:

- providing language interpreters, American Sign Language (ASL) interpreters, closed captioning and other language options for engagement events
- facilitating participation by telephone for online events when possible
- assessing event venues for accessibility needs including physical accessibility for a diverse range of mobility needs, spaces that meet the needs of gender-diverse people and spaces that otherwise reflect BCOHRC's values around inclusion and equity
- working with community partners to design regional events that address local accessibility concerns
- considering background noise in the spaces we book and ensuring sound amplification
- ensuring good wayfinding options for guests including signage and staff in key places

Educational materials

When designing educational materials, we apply the principles of Universal Design for Learning (UDL). Our materials are assessed for the following:

- plain language
- visual design for readability, such as contrast and structure
- inclusive language and representation
- closed captioning, transcription and multilingual translation
- consideration of cognitive load
- cultural humility
- trauma-informed practice

Physical environment and remote work

Accessibility was a key consideration in the design of our office space. We worked with a specialist who mapped accessibility by following the journey of an individual trying to enter the office from outside the building. A few of the key design features include:

- the counter in the reception area's height is lower and has rounded corners to make it more wheelchair accessible
- the reception area also has contrasting colour to distinguish floor and walls and is large enough for people in wheelchairs to maneuver
- corridors and hallways are wide and have slip resistant flooring and appropriate lighting
- door handles are designed for easy use, door colours are designed to contrast with their surroundings and automatic doors open slowly and remain open for enough time to allow wheelchair users and people using other mobility assistant devices to enter and exit
- work stations are height-adjustable for all staff and our onboarding procedures include an assessment of any accessibility technologies or physical equipment staff may require for their set up
- people with disabilities are provided accommodations to work remotely, including delivery of equipment to ensure access for those who cannot transport furniture and equipment
- scent and other allergies are addressed by mandating a low-scent environment and posting allergen notices in the office
- the masking mandate has been continued in our office to allow immunocompromised people and those who are otherwise at higher risk for contracting airborne illness to participate

External communications

We aim for all our external digital communications materials to meet the AA standard of the Web Content Accessibility Guidelines (WCAG 2.0). Website and social media images include alternative descriptive text and videos are captioned, transcribed and sometimes dubbed into multiple languages. All materials are assessed for plain language comprehensibility.

Staff and contractors follow an accessibility checklist when preparing materials for publication. Content is ordered appropriately and sectioned by headings and text is written in plain language. All text is machine readable, reading order is defined and design meets colour contrast standards.

Recruitment

Accessibility considerations have also been integrated into our recruitment processes, including:

- accessible language in job profiles
- preference statements for persons with disabilities, which state that a person with a disability's lived experience is viewed as a form of job expertise that may be considered when applications are evaluated
- webinars to provide further information on positions and allow potential applicants to meet the hiring team and ask questions
- opportunities for candidates to share any accommodations they need to make their application

experience as accessible and positive as possible
- interview questions provided to candidates 24 hours prior to the interview
- options presented to candidates regarding the interview format (for example, changing the order of questions or using a presentation instead of question/response)

Public campaigning

In 2022/23, working with disability-serving organizations across the province, BCOHRC ran a public anti-ableism campaign called #RewriteTheRules, which focused on exposing the unwritten rules about disability with which we all live. These rules add up to a system that favours the needs and experiences of able-bodied and neurotypical people in big and small ways every day. The key audience for this campaign was non-disabled people who are largely unfamiliar with the concept of ableism and its impacts. The campaign invited people to consider how these rules hold us all back and to encourage action toward more inclusive communities.
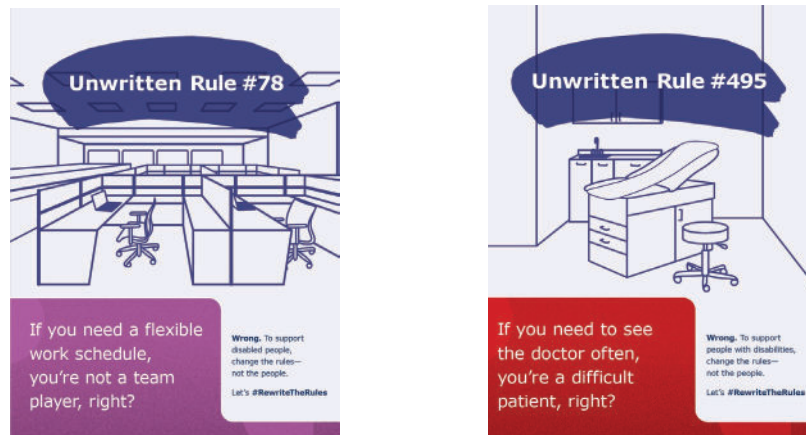

Figure 1. Samples from the #RewriteTheRules campaign

Comments from participants in the campaign can be organised into three main themes:

1. Building accessibility: We heard comments about personal experiences of inaccessible building design.
2. Support in education: We heard comments about the need for greater educational supports so disabled people can fully participate in the K-12 and post-secondary education systems.
3. Ageism and ableism: Several commenters drew a connection between age and ableism, particularly in a health care context.

The #RewriteTheRules campaign was informed by an advisory circle with representatives from Disability Alliance BC, the BC Aboriginal Network on Disability Society, the Terrace and District Community Services Society and others. The campaign was adapted into community events in Terrace, Victoria and Kelowna, where community conversations about the role of ableism in local communities took center stage.

We are proud of the work we have done around accessibility but acknowledge the need for continual improvement. The three-year priority action plan that follows later in this document lays out the next steps for BCOHRC.

Looking forward: Building our accessibility plan

Our accessibility plan was developed based on inputs from accessibility specialists, BCOHRC staff with professional expertise and lived experience of disability and members of the public who have participated in BCOHRC events or engaged with BCOHRC projects. Some of the ways we have gathered input to build this plan include:

- participating in the BC Public Service – Accessibility Community of Practice
- conducting an accessibility audit of our communications products
- conducting an accessibility audit of our Vancouver office space
- consulting with disability serving organizations in the development of our public campaign and with Disability Alliance BC and the joint accessibility committee on the draft of this plan
- reviewing feedback from workshop participants
- including questions about accessibility in our Workplace Environment Survey for employees

BCOHRC's guiding framework

Principles

Our plan follows the principles outlined in the *Accessible British Columbia Act*.

- »**Inclusion:** Full and equal participation in our communities is a human right for all people in British Columbia, regardless of ability or identity.
- »**Adaptability:** Our understanding of disability and accessibility is constantly evolving. This plan reflects that and will change as we learn and grow.
- »**Diversity:** We understand that all of us have **intersectional** identities and experience discrimination and privilege in diverse ways. Inequality, discrimination and injustice are rooted in the systems around us and must similarly be addressed in a **systemic** way.
- »**Collaboration:** We operate on the basis of "nothing about us without us"[3] and we centre the perspectives and rights of those most marginalized and those whose rights are at stake. In B.C. and around the world, people with disabilities continue to face high levels of discrimination and are among the most marginalized in our communities. We will work collaboratively with disabled

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[3] While the original origins of these phrase predate this occurrence, 'Nothing about us without us' is the slogan that was adopted by the International Disability Caucus[1] during negotiations surrounding the creation of the international treaty, the United Nations "Convention on the Rights of Persons with Disabilities"[2] ("CRPD"). It signifies the belief that disability rights should not be created without including the voices of persons with disabilities and their representative organizations.

people and disability rights organizations to advance the rights of people with disabilities.

» **Self-determination:** Accessible resources should empower disabled people to make their own choices and pursue the lives they wish to live.

» **Universal Design:** The Centre for Excellence in Universal Design defines Universal Design as "the design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability." An accessibility plan should be designed to meet the needs of **all people** who wish to interact with our Office.

Building on other legislation

In addition to the *Accessible British Columbia Act,* B.C.'s *Human Rights Code* articulates key principles for promoting accessibility. The *Code* prohibits discrimination based on personal characteristics or "protected grounds" such as race, sex, religion, gender identity and physical or mental disability in the following areas of daily life: housing, employment, services, publications and membership in unions and associations. The Human Rights Commissioner has broad powers to address systemic discrimination in all areas covered by the *Code* and to take action to promote and protect human rights in the province.

BCOHRC is also charged with promoting compliance with international human rights obligations. Here, we look specifically to the United Nations *Convention on the Rights of Persons with Disabilities*, which calls on government bodies to take appropriate measures to "ensure that persons with disabilities can access, on an equal basis with others, [...] facilities and services open or provided to the public."[4]

Our approach

Accessibility is a guiding principle of our work. We strive to incorporate accessibility considerations in our operational and project work, whether public facing or internal. Our external facing work includes research, education, litigation, community engagement and policy work aimed at building support for and advancing human rights in the province. Our internal work includes the organizational development and culture, including internal education, staff engagement and policy and process development.

We apply a **Human Rights Based Approach (HRBA)** to all our work. HRBA is a conceptual framework based on human rights standards and is operationally directed toward promoting and protecting human rights. It seeks to analyse inequalities that perpetuate unequal access and discriminatory practices.

There are some core assumptions of an HRBA as it applies to accessibility:

- **universality** of human rights, meaning rights are inherent to every individual without discrimination
- **intersectional equality and non-discrimination**, meaning people hold multiple identities that may impact the way they experience discrimination in different contexts

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[4] United Nations Convention on the Rights of Persons with Disabilities, Article 9: Accessibility. https://www.un.org/development/desa/disabilities/convention-on-the-rights-of-persons-with-disabilities/article-9-accessibility.html

- **meaningful participation, inclusion and empowerment**, meaning impacted people have the right to be part of the process in seeking solutions, have agency and must be supported in making decisions and taking action
- **transparency and accountability**, meaning accurate information must be made available about our commitments and performance so that we can be held accountable by our peers and stakeholders

Decolonization and accessibility

It is important to note that our plan is driven not only by our commitment to accessibility, but by all our guiding principles. This includes our commitment to take a decolonizing approach to our work, which is the ongoing process of recognizing and removing colonial powers. We recognize that Indigenous peoples may experience the impacts of discrimination related to disability differently than others as a result of colonization and racism.

Identifying barriers

We understand the importance of engaging with various experts, particularly those with lived experience of disability, to help us identify barriers. BCOHRC does this in three main ways:

1. **Audits and gap analysis:** Working with accessibility experts, we have completed audits of our physical space and most recently our online content and resources.
2. **Employee input:** Biennially, a Workplace Environment Survey invites input from staff regarding

accessibility issues; we also conduct various other engagements through our Accessibility Working Group.

3. **Feedback from the public:** People are invited to share comments on BCOHRC public engagement events, education materials and all other work. This input is invited through co-creation of many of our projects through advisory circles and communities of educators. We also collect feedback through post-event forms for digital and in-person engagements. Examples of this approach include the "Community of Educators" involved in the co-creation of our systemic discrimination workshop and project materials, the role of the Advisory Circle in the development of our baseline project on human rights issues in Chetwynd, Cranbrook, Abbottsford and Terrace, and the role of the joint accessibility committee in the creation and evaluation of BCOHRC accessibility plans.

Once barriers have been identified, we work with staff and relevant groups to build a plan to mitigate, avoid or eliminate those barriers. Some of the kinds of barriers we have identified in our work are as follows.

1. **Systemic or organizational barriers** are barriers that, either intentionally or not, exist in policies, procedures or practices.
   Some examples of how we are currently working to dismantle systemic barriers include:
   - application of a decolonizing lens to the development of all policy frameworks
   - inclusion of preference statements in job descriptions for persons with disabilities

2. **Physical barriers** are the elements of the built environment that may limit people's ability to participate fully. These may exist in office spaces, outside of office spaces, in event venues and in other spaces where BCOHRC conducts our work.
   In addition to those noted earlier, some examples of how we are currently working to dismantle physical barriers include:
   - having built our Vancouver offices for purpose with the support of an accessibility consultant; our suite meets all building accessibility standards and where possible we exceeded standards.
   - having brought on an accessibility consultant to conduct a gap analysis of the physical accessibility of our building's public areas beyond our suite; the analysis was provided to building management and we continue to work towards implementation for the building beyond our suite

3. **Information or communication barriers** relate to both the sending and receiving of messages. These barriers exist when, for example, various sensory and cognitive challenges have not been considered when sharing information.
   Some examples of how we are currently working to dismantle communication barriers include:
   - providing closed captioning of webinars and presentations for those with hearing impairments
   - providing publications in multiple languages and in plain language

4. **Technological barriers** exist when technology itself acts as a barrier to access or when adaptive technology is not able to interact with information to support its user.
   Some examples of how we are currently working to dismantle technological barriers include:

- using alternative descriptive — text for those using screen readers
- developing tab-ordered content for keyboard navigators
- offering educational materials in different formats (electronic, printed, etc.)

5. **Attitudinal barriers** are the most difficult to identify and overcome. These are behaviours, perceptions and assumptions that may lead people to discriminate against, ignore or judge people with disabilities.

Some examples of how we are currently working to dismantle attitudinal barriers include:

- providing training to staff on accessibility issues
- running an anti-ableism campaign specifically focused on raising awareness about the unwritten rules that continue to discriminate against people with disabilities
- creating spaces where members of the disability community can provide feedback on our work and be in control of the narrative that surrounds their experience. For example, through the use of advisory circles, grants to disability serving organizations to run public events and the co-creation of educational materials

Focus areas

BCOHRC has many areas where we can improve accessibility both for our internal staff and for the communities we work with externally. Our framework is broken down into four focus areas that reflect BCOHRC's mandate and areas where accessibility standards are defined in legislation, including the *Accessible British Columbia Act*.

Operations

- preventing or removing barriers in the day-to-day functioning of the Office including in policies and processes, the built environment and procurement
- focus on: office spaces, procurement processes and incorporating accessibility into strategy and evaluation processes (for example, ergonomics)

Public engagement and education

- ensuring BCOHRC has accessible mechanisms for holding respectful relationships and being accountable to all people in B.C.; developing a suite of accessible educational and guidance resources and forums
- focus on: educational resources, engagement events and forums, research activities and legal inquiries

Information and communication

- ensuring communication materials for print, web and other platforms are accessible to all people in B.C., as well as specifically for BCOHRC staff and contractors
- focus on: accessible web materials, plain language writing and accessibility in publications production and other resources

Employment

- developing policies, procedures and practices that remove barriers from the recruitment and selection process, through to building a work culture focused on inclusivity and accessibility
- focus on: work environment, health and safety and human resources policies and practices

Three-year priority action plan

FOCUS AREA	PRIORITY	PLANNED ACTIONS	LEAD DEPARTMENT	TIMELINE
Operations	Ensure procurement approach and practices are free from/address accessibility barriers	Audit existing procurement practices and set goals/develop a plan	Operations department	2023/24
		Implement the plan: developing policies, internal training, etc.		2024/25
		Monitor and report		2025/26
Public engagement	Ensure accessibility of educational materials	Audit select educational products for accessibility	Education and Engagement department	2024/25
	Incorporate participant and expert feedback into engagement processes	Systematize the collection, analysis and application of feedback on the accessibility of BCOHRC events	Engagement department	2025/26
Information and communications	Ensure external digital communications materials are Web Content Accessibility Guidelines-2.0 compliant	Implement action items from 2023 audit	Communications department	2024/25
		Monitor and report		2025/26
Employment	Accessibility-specific policies and practices for staff	Conduct a gap analysis of existing policies and procedures with an accessibility lens	Operations department	2024/25
		Develop relevant policies and procedures		2025/26

Monitoring and evaluation

BCOHRC has developed an evaluation framework that is used to assess our progress toward key priorities and objectives on a yearly basis. The results of this evaluation include explicit measures of accessibility indicators.

Within the evaluation framework, the following objectives are most relevant to accessibility.

1. **Objective:** BCOHRC has accessible mechanisms for holding respectful relationships and accountability to all stakeholders
   Indicators:
   - types of accessible mechanisms

2. **Objective:** BCOHRC has a suite of publicly accessible educational and guidance resources and forums
   Indicators:
   - number and type of resources publicly accessible
   - extent to which resources are accessible
   - number of forums
   - number of forum attendees
   - extent to which forums are accessible

3. **Objective:** BCOHRC has a culture and a suite of policies and practices that align with the guiding principles, including human rights-based and decolonizing approaches
   Indicators:
   - percentage of BCOHRC staff who agree with statements on culture, policies, principles and values
   - duration of tenure at BCOHRC (retention); reported reasons for joining, staying and leaving
   - use of leave days
   - number and percentage of staff who report professional development opportunities are equitable or useful
   - number and type of professional development opportunities completed by staff

In addition to evaluation under BCOHRC's evaluation framework, our Accessibility Report will track implementation of the actions identified in the "Three year priority action plan" section and report on progress, including status of the action. We will provide an update on progress towards achieving our accessibility goals annually in conjunction with our broader annual report, which will contain a section about our accessibility plan.

Feedback mechanism

BCOHRC will conduct a review and evaluation of the accessibility plan every three years from adoption (2024). This report will be made public on our website. Anyone wishing to provide specific feedback on this accessibility plan, any of BCOHRC's forums, events or engagement activities, research and written materials, both digital and hard copy, can contact the Office by emailing info@bchumanrights.ca, leave us a message by calling 1-844-922-6472 or provide feedback in the evaluation forms provided after BCOHRC events.

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