Canadian Hard of Hearing Association, British Columbia Chapter (CHHA BC) Consultation Session Report to the Accessibility Directorate of the Government of British Columbia

1. Introduction

This report summarizes the response by the Canadian Hard of Hearing Association, British Columbia Chapter (CHHA-BC) to proposed Provincial Government Accessibility Standards.

CHHA-BC is a consumer-based, non-profit, and self-help organization. Formed in 1986, it is part of a national network and includes local branches in the Province of British Columbia. CHHA-BC represents the interests of hard of hearing persons and is engaged in awareness-raising, educational and advocacy activities.

CHHA-BC held a consultative session about proposed accessibility standards for in services and employment in British Columbia on July 18th, 2024 from 6:00 to 7:30 p.m. Twenty-four participants registered for the on-line zoom session, most of whom are hard of hearing.

The overall objective of the session was to provide feedback on current standards of accessibility in three key areas.

- Accessible Service Delivery Standards
- Employment Accessibility Standards
- Implementation of the Draft Accessibility Standards

A CHHA-BC board member served as the moderator of the session, while staff provided technical support. The session began with a formal introduction and a land acknowledgement, recognizing and respecting the traditional territories on which the consultation was conducted. This was followed by an overview of the session's objectives and of the importance of inclusive accessibility standards.

The moderator guided the discussion through a slide deck attached in the appendix. Communication Access Real-time Translation (CART) was provided during the session. Prior to the workshop, registered participants were provided draft standards for Accessible Service Delivery and Employment Accessibility prepared by the Accessibility Directorate.

The zoom call was interactive with participants expressing their views and responding to eight poll questions taken from the online web survey developed for the consultation. Registrants unable to attend the online session were encouraged to complete the survey and submit their feedback directly. Their feedback is included in our report.

Following the on-line session, participants were contacted to gather any additional recommendations or comments.

2. Issues for Attention

Issues pertaining to accessibility for hard of hearing persons centred around disability-related accommodations, training, human resources, inclusive workplaces, disclosure, educational videos and standards implementation.

Inclusive Accommodations

Hard of hearing persons vary in their level of hearing loss and the type of accommodations required to be included. Thus, it is important that accommodations be tailored to individual needs rather than relying on a one-size-fits-all approach.

Organizations should always start by asking individuals about their accommodation services preferences to ensure personalized and effective support. Ethical considerations are important, as disability affects individuals differently. Offering personalized accommodation ensures that everyone's unique needs are met, enhancing their overall experience.

It is important to ensure that all meetings are accessible to individual hard of hearing persons. This includes providing microphones at meetings, implementing clear communication policies, and training staff on effective communication strategies.

As well, this calls for the need for the provision of services such as captioning (one form is known as Communication Access Realtime Translation or by the initials of CART). Captioning should be available in for meetings and in public places such as theatres, parks, airports, and other common areas. This form of access is not well understood and is inadequately resourced.

Accommodations are required in all facets of life. This include within schools and educational institutions. They must welcome hard of hearing students to ensure they receive the support needed to succeed academically. Support includes accommodations such as assistive technology, captioning, and tutoring.

Training

Effective training programs are needed to enable staff to meet the individual needs of hard of hearing persons, whether in the workplace, the educational sector or in other sectors. In clinical healthcare settings, for example, hard of hearing persons often face significant barriers to effective communication and service delivery.

Thus, government agencies and employers should implement comprehensive accessibility training programs. The plan should be clear and comprehensive, specifying who will be trained, where and when. The plan should include content related to communication strategies for hard of hearing persons as well as accommodations required to eliminate barriers to accessibility for them.

Human Resources

This issue arose in particular within the healthcare sector but also impacts on other sectors. In particular, it was envisioned that human resources departments in healthcare settings have a strong role to play in promoting accessibility, but it was also understood that they need additional staff resources to fulfill this role. This gap highlights the need for better resource allocation.

Inclusive Workplaces

An inclusive workplace should create a non-judgmental environment and provide necessary accommodations to support hard of hearing staff. Organizations play an important role in providing accommodations for their hard of hearing employees and ensuring that their rights are protected.

Disclosure

Persons should not be required to disclose their disabilities in job interviews. Nor should they be required to provide documentation to receive accommodations for job interviews. Employers should be proactive in offering accommodations and should provide them without requiring medical documentation.

Educational Videos

The Government should produce and distribute educational videos, explaining accessibility standards and the availability of resources. These videos need to be easily accessible and widely shared to maximize their reach and impact. Employers should ensure that they share these videos with their staff. Content related to hard of hearing persons should be included.

3. Standards Enforcement

In discussing standards enforcement, participants stressed that hard of hearing individuals should be recognized as an important component of disability groups. Lessons learned from smaller organizations that have successfully implemented access strategies can provide valuable insights and best practices for larger organizations.

Developed accessibility standards should be strengthened and specific to avoid broad and vague guidelines. Clear and actionable standards are essential to ensure consistent and effective implementation.

There should be penalties for non-compliance with standards.

4. Results of Specific polls

As noted previously, during the on-line consultation several polls were administered. The content was similar to that developed by the Accessibility Directorate of the Government of British Columbia. Eight polls were administered altogether.

Participants gave positive evaluations to the effectiveness of the draft recommendations regarding service delivery, with all respondents stating they were very important or important. This is shown in Poll #1.

Participants also gave high ratings to the question about rating the effectiveness of the draft recommendations empowering people with disabilities and honoring them as experts in their own experience. See responses for this poll called Question#2.
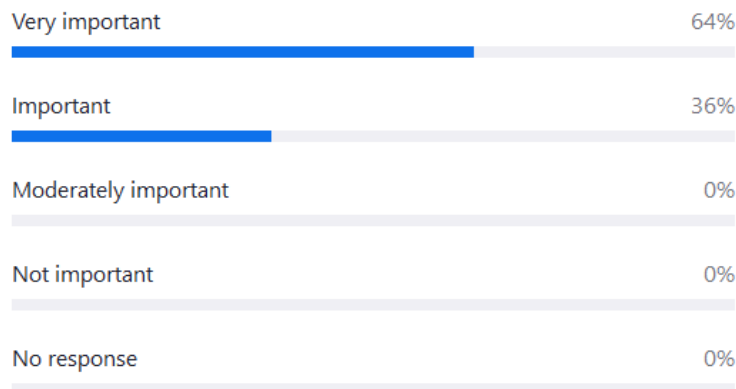
Question #1 Accessibility Consultation

1. Pertaining to service delivery, rate the effectiveness of the draft recommendations regarding accessible organizations. (Single Choice)

Very important 58%

Important 33%

Moderately important 0%

Not important 0%

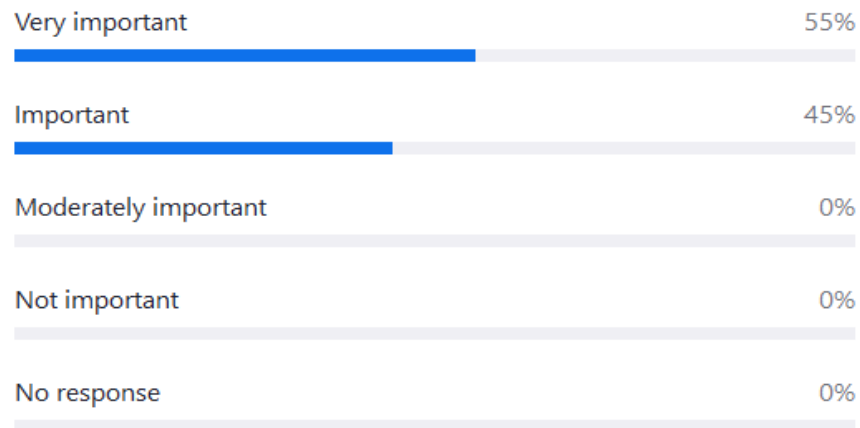No response 8%
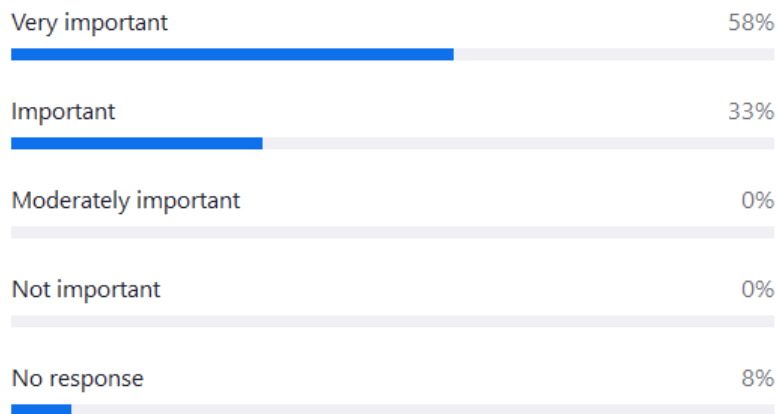
Question #2 Accessibility Consultation

1. Pertaining to service delivery, rate the effectiveness of the draft recommendations empowering people with disabilities and honoring them as experts in their own experience. (Single Choice)

Very important 64%

Important 36%

Moderately important 0%

Not important 0%

No response 0%

Responses are similarly positive about recommendations to removing barriers to service delivery as asked in Poll #3 during the Accessibility Consultation.
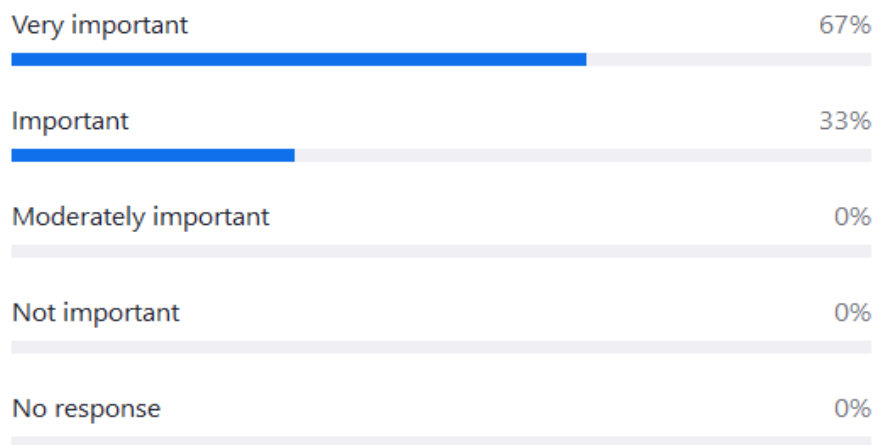
Question #3 Accessibility Consultation

1. Pertaining to service delivery, rate the effectiveness of the draft recommendations removing barriers to service delivery. (Single Choice)

Very important	55%
Important	45%
Moderately important	0%
Not important	0%
No response	0%

The fourth question pertaining to employment about the effectiveness of recommendations on hiring and recruiting. Responses were similarly favorable, either very important or important.

Question #4 Accessibility Consultation

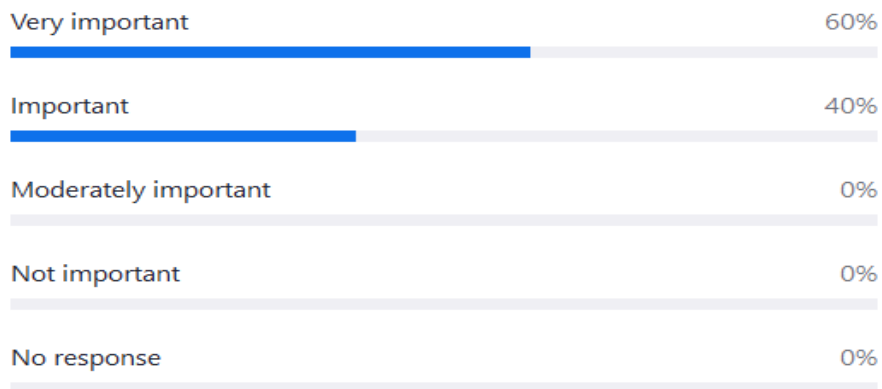1. Pertaining to employment, rate the effectiveness of the draft recommendations on hiring and recruitment. (Single Choice)

Very important	67%
Important	33%
Moderately important	0%
Not important	0%
No response	0%

There was 100% agreement with the effectiveness of the draft recommendations on accessibility in the workplace. See poll on Question #5.

## Question #5 Accessibility Consultation

1. Pertaining to employment, rate the effectiveness of the draft recommendations on accessibility in the workplace. (Single Choice)

Very important	60%
Important	40%
Moderately important	0%
Not important	0%
No response	0%

The effectiveness of draft recommendations on making the organization inclusive received 75% very important ratings, with 17% stating it was important and 8%, moderately important as shown in Question 6 poll responses.

Question #6 Accessibility Consultation

1. Pertaining to employment, rate the effectiveness of the draft recommendations on making the organization inclusive. (Single Choice)

Very important	75%
Important	17%
Moderately important	8%
Not important	0%
No response	0%
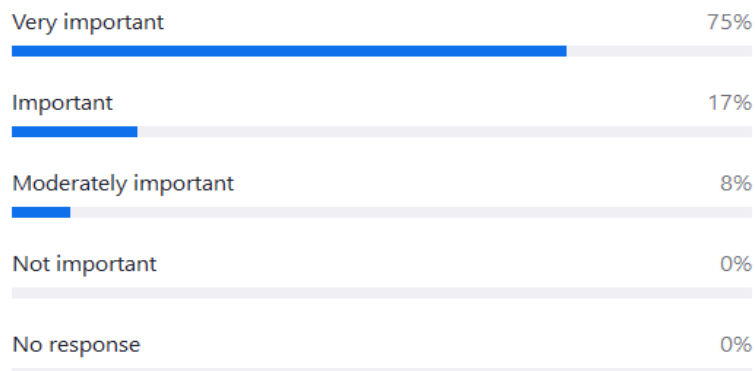
In responses to Poll Question#7 on what portion of recommendations should be implemented, a majority of respondents replied that most or all recommendations should be implemented regardless of organizational size. There was some variability with 9% saying some, and 9% saying a few, should be implemented.

Question #7 Accessibility Consultation

1. For all organizations, regardless of size, what portion of the recommendations do you think should be implemented?   (Single Choice)

All	64%
Most	18%
Some	9%
Few	9%
None	0%
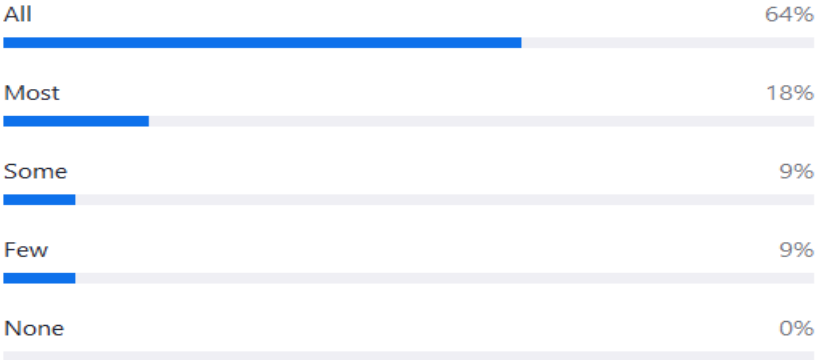
A final poll was about whether all organizations, regardless of size, should adhere to the same timeline in meeting standards.   Of the respondents, 60% agreed and 40% disagreed.

The favored timeline for implementing standards varied between 2-to-3 years for implementation to 2 years or less. No one responded in support of taking 3-to-5 years to see standards come into operation as shown in the responses to Question #8 on the next page.

Question #8 Accessibility Consultation

1. Do you think that all organizations, regardless of size, should be required to meet the standards within the same time period?   (Single Choice)

YES   60%

NO   40%

You did not answer this question

2. How much time do you think would be reasonable for organizations, regardless of size, to meet the standards?   (Single

2 years or less   55%

2 to 3 years   45%

3 to 5 years   0%

Conclusion

CHHA-BC confirms its support for the Accessibility standards in Service and Employment proposed by the Government. In our consultative session, valuable insights and suggestions for enhancing accessibility standards across British Columbia were shared. Hard of hearing participants highlighted the critical need for effective and inclusive service delivery, access to employment and the development of standards that truly meet the needs of individuals with hearing loss.

Feedback gathered from participants stressed the importance of training about the communication and accommodation needs of hard of hearing persons. Clear and actionable standards as proposed are needed to remove barriers and to promote inclusive workplaces and service centres. We look forward to the implementation of the proposed standards and our suggestions for building an inclusive society that includes persons with disabilities including those who are hard of hearing.

Submitted: October 7, 2024

Appendix One

PowerPoint Presentation used by the moderator to guide the discussion

This is a **consultative** session about Accessibility Standards being considered by the Provincial Government in the areas of services and employment.

This is our chance to give feedback on its impact for hard on hearing persons and our recommendations for future action.

WHAT IS THE PURPOSE OF TODAY'S SESSION?

3

The session will involve a discussion about:

- **Experiences** in accessing services or employment, both barriers and good practises.

- Your **views** about proposed service and employment **standards**.

- Your **suggestions** for improving accessibility in services and employment.

4

3 Areas for feedback to the Provincial Government on:

1. Service Delivery
2. Employment
3. Implementation

5

Accessibility Service Delivery Standards

6

Please tell us about **your thoughts** on the proposed recommendations under the Accessible Service Delivery Standard.

7

Drawing on your knowledge and observation of barriers people with disabilities experience in accessing services in organizations, **how would you rate the effectiveness** of the draft recommendations under each of the Accessible Service Delivery Standard themes to remove these barriers?

8

ONLINE POLL

9

Are there <u>any other</u> accessible service delivery <u>recommendations </u>that you would like the Provincial Accessibility Committee to consider including in the Service Delivery Standard?

10

Employment Accessibility Standards

11

Please share _your thoughts_ on the proposed recommendations under the Accessible Employment Standard.

12

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?

13

ONLINE POLL

14

Are there <u>any other specific accommodations</u> not included in the proposed accessible employment recommendations that you would like the Provincial Accessibility Committee to consider including in the Employment Accessibility Standard?

15

Accessibility Standards Implementation

16

In your opinion, what portion of the recommendations in the standards are suitable for organizations to implement?

All   Most   Some   Few   None

17

—

ONLINE POLL

18

Would you like to provide any additional input about how these recommendations should apply to organizations of different sizes?

Do you think that all organizations, regardless of size, should be required to meet the standards within the same time period?

ONLINE POLL

21

Would you like to provide any additional input about the amount of time organizations are likely to need to meet these recommendations?

22

You just helped give feedback and recommendations on:

1. Service Delivery
2. Employment
3. Implementation

Thank you!

23

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July 31st

24