



**Communication Disabilities Access Canada**

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**The House of Commons' Standing Committee on Human Rights, Skills and Social Development and  
the Status of Persons with Disabilities**

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I represent Communication Disabilities Access Canada (CDAC) which is a national non-profit organization dedicated to advancing access to services for people who have speech, language and communication disabilities, that are not primarily caused by hearing loss.

CDAC is on the leadership team of the Federal Accessibility Legislation Alliance and we support its recommendations. We also support recommendations submitted to this committee by ARCH Disability Law Centre and the AODA Alliance.

In this presentation, I will focus on the accessibility needs of half-a-million Canadians who have a wide range of disabilities that may affect their communication. They may have cerebral palsy, autism spectrum disorder, Down syndrome, learning disability, intellectual disability, traumatic brain injury, aphasia after a stroke, dementia, Amyotrophic Lateral Sclerosis, Parkinson's disease, Multiple Sclerosis and other disabilities.

The consultation report that CDAC submitted to committee members provides powerful input from over 2,000 Canadians about the communication barriers experienced by people who have speech and language disabilities when using federal services. Many of the people who responded to our national survey could not attend the government's public consultations due to the lack of communication supports to participate at these events.

CDAC supports Bill C-81. However, we are asking the government to strengthen it in order to include the accessibility needs of people who have disabilities that affect their communication. At this time, Bill C-81 identifies six priority areas - employment, built environments, procurement of goods and services, program and service delivery, transportation and information and communication technologies.

We propose that **communication** should be addressed in a broader context than information and communication technology. Most accessibility standards and guidelines narrowly address communication as attitude and respect, plain language as well as accessible websites and alternative formats. While these are important, they fail to address the broader needs of people who have communication disabilities and who may have difficulty processing what people are saying or who may have little or no speech and communicate using picture, symbol, letter boards or speech generating devices.

Communication is about giving and receiving information between two or more people. It is about understanding each other's messages. It occurs in **ALL government jurisdictions** that interact with members of the public, in face-to-face interactions, via telephone communication, at public forums, committee meetings, government consultations, as well as information services – websites, e-communications, hard copy documents, written surveys and forms. These are the critical communication contexts for all people with communication disabilities. If communication is solely addressed as information and communication technologies, then the barriers experienced in these contexts are missed.

We propose that the government amend Bill C-81, Section 5 or advise the CASDO to prioritize two generic domains as essential building blocks that should be put in place as early as possible and form

the foundation for access to all jurisdictions. These domains are **Diversity, Equity and Inclusion** and **Inclusive Communication**.

Within the domain of **Diversity, Equity and Inclusion**, an example of a standard might be to require training for government workers, across all jurisdictions on the values and principles of inclusion, dignity, autonomy, non-discrimination practices, human rights and accessibility rights.

The second domain, **Inclusive Communication** would include generic communication standards about communication access for **all** people who have disabilities affecting their communication including people with speech and language disabilities and people who have sensory disabilities. My examples here relate to people with speech and language disabilities, because CDAC focuses on their accessibility needs. An example would be requiring training for all service providers in how to communicate with a person whose speech is unclear or who uses a letter board or a speech generating device; what to do if a person does not understand a message; how to accommodate a person's slower rate of communication; how to produce a plain language document; how to provide text based alternative to telephone services; how to host a meeting that is accessible for people with communication disabilities.

The generic domain of Inclusive Communication would provide a baseline across all jurisdictions that each jurisdiction would be expected to develop further for their specific communication contexts. For example, just as federal courts are currently obligated to provide sign language interpreting services for a victim / witness or accused who requires a sign language interpreter, they would be obligated to provide a communication intermediary to assist a person with a speech and language disability. People providing telephone services via Service Canada and Canada Revenue Agency would know how to communicate with a person who uses a speech generating device and have procedures to allow the use of an authorized communication assistant when a person cannot independently and effectively communicate over the telephone. Elections Canada would implement secure, online voting for people using their customized assistive technology.

It is important to note that people with speech and language disabilities want Bill C-81 to further define the federal government's leadership role in promoting communication access across Canada. For them, this means not only coordinating accessibility regulations across the country but also negotiating and working with local, provincial and territorial governments to ensure that people have the communication devices and supports they need in order to access all services across the country, gain employment and participate fully in society.

I welcome your questions.

Thank you.