

**“Nothing about us without us” includes people who have speech,
language and communication disabilities.**

**A Call to Action
May 20, 2021**

Addressed to: Minister Carla Qualtrough, Minister of Employment, Workforce Development and Disability Inclusion

[Communication Disabilities Access Canada](#) (CDAC); Speech-Language & Audiology Canada (SAC) and the undersigned supporters of communication accessibility rights, urge the federal government to take immediate and specific steps to ensure that [Canadians with speech, language and communication disabilities](#) are included in the implementation of the Accessible Canada Act (ACA).

Although the government supports “Nothing about us without us” and recognizes interactive “communication” as a priority area in the Accessible Canada Act, Canadians who have speech, language and communication disabilities, and /or their representative organizations, are not currently represented on the Accessible Standards Committee (ASC), or on technical committees that advise on the development of accessibility standards and regulations. In addition, government entities, responsible for ensuring accessibility to their services, have not yet consulted with this disability cohort and/or their representative organizations.

To date, the exclusion of people who have speech, language and communication disabilities and their representative organizations has impacted:

- The development of meaningful communication access standards and regulations, guidelines and resources for people with a wide range of diverse speech, language and communication disabilities and accessibility requirements.
- Appropriate allocations of public funding to support activities relevant to communication access issues and the adoption of existing, evidence-based research and resources.
- Recognition of the central role of communication in the roll out of the ACA and compliance with the United Nations Convention on the Rights of Persons with Disabilities (CRPD).

For Canadians who have speech, language and communication disabilities, their exclusion further contributes to:

- Ongoing experiences of isolation, vulnerability and marginalization.

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- Continued inaccessible services, especially essential services where communication is critical such as justice, public health and financial services.
- Little or no protection to safeguard the right to effective communication and equitable services.

We strongly urge the government to act immediately on the following four steps:

1. Solicit and expand data gathering and analysis efforts to comprehensively address the needs of Canadians who have speech, language and communication disabilities.

Data on individuals with speech, language and communication disabilities is limited, disjointed and insufficient to shape accessibility policies, safeguards and programs to address the needs of this population. No reliable statistical information exists at a federal, provincial or territorial level on the prevalence of speech, language communication disabilities and the impact of these disabilities on education, health, legal and justice services, employment, and quality of life of this population. For example, the Canadian Survey on Disability (CSD) which is intended to be accessed via the Disability Screen Questions (DSQ), does not identify Canadians who have speech, language and communication disabilities and their accessibility needs. When people go uncounted, their needs, and rights are ignored.

2. Formally engage people who have speech, language and communication disabilities and their representative organizations to participate on all committees and government entities involved in the implementation of the ACA.

To date, the ASC, technical committees and government entities have engaged people with two types of communication disabilities - vision and hearing - while neglecting to include input from people who have disabilities that affect how they speak and/or understand spoken language. The absence of this disability cohort is evident in accessibility documents which typically illustrate a lack of understanding of the complex and diverse nature of communication disabilities; the communication barriers that people experience and fail to provide guidelines for addressing these barriers in different service contexts such as face-to-face interactions, telephone and remote communications, public consultations, meetings, reading and writing. Without representation from this disability cohort, communication accessibility standards, regulations and guidelines will perpetuate obstacles to equitable services for Canadians with disabilities that affect their communication.

We ask that individuals with speech, language and communication disabilities be engaged to reflect their personal, lived experience in all aspects of the implementation of the ACA. In addition, given the broad scope of communication disabilities, we ask that Speech-Language Pathologists from representative organizations be consulted to ensure that accessibility standards are inclusive and meet the needs of all people with speech, language and communication disabilities.

3. Define effective communication accommodations and supports for Canadians with speech, language and communication disabilities and acknowledge the duty to accommodate these requirements in all federal services, especially in essential services where effective communication is critical, such as justice services, safety, public health and financial services.

People who have speech, language and communication disabilities will remain vulnerable and excluded from accessing essential services without robust safeguards to protect their right to effective communication accommodations and supports. For example, at this time, there is no directive for federal courts and tribunals to provide qualified communication intermediaries to assist victims, witnesses and offenders who have communication disabilities communicating in these situations. We ask the government to request that the Canadian Human Rights Commission work with the communication disability sector to build a knowledge base and guidelines that protect the communication access rights of Canadians who have speech, language and communication disabilities in essential services such as justice, safety, public health and financial services and to ensure that these guidelines compile with the United Nations Convention on the Rights of Persons with Disabilities.

4. Ensure the human right to effective communication for Canadians with speech, language and communication disabilities in public health emergencies.

The Covid-19 pandemic has highlighted the urgent need for government leadership to define the communication supports for people with communication disabilities in a public health emergency. There are numerous reports of patients not having access to their communication aids, or a trusted support person, to assist them communicating in emergency situations. Patients with communication disabilities have been left unable to communicate with healthcare providers, to give informed consent or to maintain contact with their family and loved ones. People with communication disabilities living in the community experienced significant isolation and stress, unable to maintain contact with family using the telephone or internet-based technology. In many cases, people who communicate by pointing to items on a picture, symbol or letter board, lost their support staff due to safety concerns about not being able to social distance. We ask the Public Health of Canada to develop guidelines that clearly address the communication accommodations and supports that must be provided in public health emergencies for people who have speech, language and communication disabilities and who may rely on using ways other than speech to communicate.

We call on the federal government to lead the way in ending the current, systemic exclusion and marginalization of the over half-a-million Canadians who have speech, language and communication disabilities by including them in all aspects of the

implementation of the ACA. Our organizations and professionals who support individuals with communication disabilities, are available to provide input and guidance to you and government entities to make services communication accessible for all.

Please direct questions and correspondence to:

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This Call to Action is endorsed by the following organizations:

Speech-Language & Audiology Canada
International Society for Augmentative and Alternative Communication - Canadian Chapter
Blissymbolics Communication Institute-Canada
[Ontario Association of Speech-Language Pathologists and Audiologists](#)
[Speech and Hearing British Columbia](#)
[Yukon Speech Language Pathology and Audiology Association](#)
[Newfoundland Association of Speech Language Pathologists and Audiologists](#)
[New Brunswick Association of Speech Language Pathologists and Audiologists](#)
Alberta Speech Language Association of Private Practitioners
Communication Access to Justice
Aphasia Institute - The Pat Arato Aphasia Centre