**Background**

The CNIB Foundation thanks the Accessibility Advisory Council for an opportunity to provide comments on its Discussion Paper on Recommendations for an Information and Communications Accessibility Standard. Our recommendations are intended to

bring forward some of the diverse perspectives and needs of the 18,706 Manitobans who are blind or partially sighted.

Our review of the Discussion Paper found the draft Information and Communications Standard generally clear, relevant and achievable. CNIB has identified 5 sections whereby adjustments to text or timelines may result in a more impactful Standard. Associated recommendations follow within each section and are summarized at the end of this document.

CNIB celebrates the enactment of the Accessibility Standards for Customer Service and Employment, and looks forward to continued participation in future consultations on the Design of Public Spaces and Transportation Standards. We consent to this submission being shared publicly without reservation.

**3.0 Application and Phase-In of Obligations**

**Extended Timelines**

The Information and Communications Standard as drafted outlines an implementation timeline of up to 5 years after the standard becomes law. While we recognize that these changes will take time to implement systematically at government, public sector and private sector levels, CNIB is concerned with the slow speed of implementation. The delay of 2-4 years before emergency procedures, plans and public safety information are made accessible, is particularly concerning.

As organizations of all sizes have become aware of the Accessibility Standards for Customer Service and Employment, they have taken steps to meet these Standards. Many larger employers are already moving in the right direction, by identifying an accessibility coordinator, developing staff training procedures, documenting accessibility plans, and creating accessible workplace emergency response plans and information.

Given this momentum and the greater awareness of accessibility in both the public and private sectors, CNIB believes that most organizations could reasonably meet the requirements for new information and emergency procedures in two years rather than the proposed two- to five-year timeframe.

**Pre-Existing Information and Communications Actively in Use**

The proposed application of standards requires pre-existing information and communications which are actively in use to be made accessible in four and five years for the Manitoba Government and public sector respectively, however, makes no similar requirements for all other organizations and businesses. Putting the onus on individuals to request access to pre-existing information which is still actively in use, including forms, pdf’s, and important information, leaves in place a long-standing barrier to an inclusive Manitoba. For Manitobans who choose to request materials, delays in receipt of accessible materials can significantly impede education and employment opportunities for people who are blind or partially sighted.

CNIB recommends that all other organizations be required to meet the same standards as government and public sector organizations regarding pre-existing information and communications actively in use within no more than five years.

**4.1.b Barrier-Free Access to Information and Communications**

Many Manitobans with sight loss rely on screen readers or screen magnification software to access electronic information. Assistive technologies including screen magnification and text to speech software have leveled the playing field for Manitobans who are blind or partially sighted. These technologies have broken down many barriers to employment opportunities, however barriers persist in workplaces that rely on inaccessible software systems they have either developed in-house or procured.

CNIB recommends section 4.1 on barrier-free access apply to all sectors and sizes of organizations, and apply to all aspects of hardware, software, and ICT services, both developed internally and procured.

**9.0 Documentation of Measures, Policies and Practices**

The proposed Information and Communications Standard follows recent changes to the Customer Service Standard which limits the requirement for documentation of policies and practices to organizations with 50 or more employees.

The importance of developing clear measures, policies and practices is not only about ensuring well documented information on progress organizations are making in meeting the standards but also creating discussion within the organizations about meeting the communications needs of all Manitobans. In smaller cities and communities in Manitoba, and in smaller organizations across the province, staff often wear many hats. Without documentation requirements for smaller organizations, employees who prepare or purchase information or communications on an irregular basis as one small part of their job may be unaware of the Information and Communications Standard.

CNIB recommends documentation requirements of measures, policies and practices be extended to all organizations with more than 20 employees.

**10.0 Educational and Training Resources and Materials**

Sections 10-14 in the draft Information and Communications Standard have changed significantly from the ICS development committee report. The draft standard and recommendations submitted by the Information and Communications Standard Development Committee included section 11.0 Training, to address the importance of training all staff members who will be sharing, procuring or authoring information and communications materials. Experience from Ontario has demonstrated the need for adequate staff training. In the 2019 Legislative Review of the *Accessibility for Ontarians with Disabilities Act, 2005*, “The emphasis on staff training was echoed by others who pointed out how complex website development and replacement projects can be” (39).

CNIB recommends that the Information and Communications Standard include a requirement that training be provided to all persons who develop, purchase, or share information and communications.

**Summary of Recommendations**

1. CNIB recommends all organizations should meet the requirements of the Information and Communications Standard for new information and emergency procedures in two years rather than the proposed two- to five-year timeframe.
2. CNIB recommends that all other organizations be required to meet the standards regarding pre-existing information and communications actively in use within no more than five years.
3. CNIB recommends section 4.1 on barrier-free access apply to all sectors and sizes of organizations, and apply to all aspects of hardware, software, and ICT services, both developed internally and procured.
4. CNIB recommends documentation requirements for measures, policies and practices be extended to all organizations with more than 20 employees.
5. CNIB recommends that the Information and Communications Standard as it relates to Training include a requirement that training be provided to all persons who author, purchase, or share information and communications.

**About the CNIB Foundation**

Celebrating 100 years in 2018, the CNIB Foundation is a non-profit organization driven to change what it is to be blind today. We deliver innovative programs and powerful advocacy that empowers people impacted by blindness to live their dreams and tear down barriers to inclusion. Now, as CNIB enters our second century of operation, we're going to be even bolder in tackling the issues before us.

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