



Introduction

The Canadian Council on Rehabilitation and Work made the following recommendations for improving the Draft Standard on employment in our [8-page brief](#). We then collected feedback from our network of organizations, advocates, and the community.

Overall, we heard resounding agreement with CCRW's recommendations on the draft Standard. For each recommendation, we asked respondents to share whether they agreed, as well as invited them to provide details on why (or why not). A total of 128 respondents completed our feedback survey – each giving input on some, or all, of our recommendations.

1. Define and amplify the concept of disability confidence.

113 respondents agreed entirely with CCRW's recommendation to define and amplify the concept of disability confidence. Respondents told us they resonated with how it is *proactive* and establishes accessibility as a priority. Several pointed to the need for continuing education and widely available resources on disability confidence in workplaces, to help employers and staff challenge misconceptions and become aware of the existence of barriers.

A few respondents did not connect with the term disability confidence, feeling that it was too broad, that employers would under-prioritize it, or that businesses would fail to see its strategic utility. Others felt that employers may not be *ready* to integrate disability confidence – pointing to the need for more collective work establishing the value of workforce diversity and inclusion.



2. Move away from representation targets to achieve diversity, and refocus on strategizing, evaluating, and monitoring recruitment, retention, & advancement methods to create genuine inclusion.

95 respondents agreed entirely with our recommendation to revise the guidance on representation targets. While monitoring and evaluation is necessary, most told us they agreed that targets – without intentional workplace culture change – can lead to performative, tokenizing actions rather than true belonging. Some pointed out that targets can lead to backlash and discrimination. Others felt that because disability is under-reported, representation data is inaccurate. For these reasons, respondents agreed that targets don't go far enough to support disability inclusion.

Some respondents disagreed because targets are concrete, create accountability and incentives, and they help (in part) to address the institutional ableism preventing jobseekers with disabilities from 'getting in the door'. We agree that measurable outcomes are important, but these benchmarks should be taken as indicators towards progress – not goals in themselves – and accompanied by comprehensive accessibility and inclusion practices. Indeed, evaluating and monitoring diversity at *all* stages of the employment lifecycle – from recruitment to advancement – is critical to success.

3. Promote the development of a federal centralized accommodation fund to address accommodation needs and remove financial disincentives to accommodating workers.

106 respondents agreed entirely with our recommendation to promote the development of a centralized accommodation fund and believed this would reduce the likelihood of 'undue hardship' in implementing accommodations, streamline access, enable better tracking of utilization, and normalize the concept of accommodations to all employers.

Some respondents cautioned that careful consideration of the parameters and implications of a centralized accommodation fund, including consultation with workers



with disabilities, would be a necessary first step – and we agree. Others felt that a fund should be the responsibility of private organizations, rather than the government; or that access should be decentralized and made available through provincially regulated organizations as well. Though such recommendations are beyond the scope of the Standard, we agree investing in accommodations is a priority and best practice for all organizations.