

# Employment Standards for the Recruitment and Retention of People with Disabilities

# Phase I Summary

January 2022



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# INTRODUCTION

This report summarizes the findings from the first research phase of the *Employment Accessibility Standards for Recruitment and Retention of People with Disabilities* project. The project, which is funded by Accessibility Standards Canada (ASC), seeks to advance and inform research that will help the ASC in its development of employment standards under the *Act to Ensure a Barrier-free Canada (Accessible Canada Act),* 2019.

The objective of the *Accessible Canada Act* is to enhance the full and equal participation of all individuals in society, including people living with disabilities, through the identification, removal, and prevention of barriers in areas under federal jurisdiction to achieve a "barrier-free" Canada by 2040. The Act was introduced after an extensive public consultation process in which stakeholders emphasized the importance of achieving more consistent experiences for people with disabilities across the country<sup>1</sup> while being "ambitious and bold" to ensure that Canadians with disabilities are no longer excluded from any aspect of life. The Act seeks to identify, remove, and prevent barriers in a variety of areas, including employment, which was cited as the most important area for improving accessibility during public consultations (ESDC, 2017).

According to the 2017 Canadian Survey on Disability, only 59 per cent of Canadians with disabilities aged 25 to 64 are employed, compared to 80 per cent of Canadians without disabilities. People with disabilities earn less than Canadians without disabilities and are more likely to live in poverty. Among those with disabilities aged 25 to 64 years who were not employed and not currently in school, it is estimated that 39 per cent or nearly 645,000 people with disabilities had the potential to work (i.e., those non-working individuals who might be likely to enter paid employment under more inclusive and accessible conditions) (Morris et al., 2018).

Employment standards development under the *Accessible Canada Act* will identify where people with disabilities may face barriers and develop standards to encourage active and inclusive participation of people as every phase of the employment journey or lifecycle: recruitment, hiring, onboarding, retention, individual accommodations, return to work, performance

Prior to the Accessible Canada Act, there was no explicit national disability legislation in Canada. Instead, some experts deemed that the Charter of Rights and Freedoms, the combined influence of federal and provincial human rights legislation, employment equity legislation, and public health care offered sufficient protections and benefits to people with disabilities. Yet others characterized the Canadian system as a "patchwork" that is both impenetrable and complex for people with disabilities (McColl et al., 2017).

management, fair pay, career/job development/advancement, and job exit (Standards Development Technical Committees – Employment Terms of Reference).

The *Employment Accessibility Standards for Recruitment and Retention of People with Disabilities* project focuses primarily on the first half of the employment lifecycle – from recruitment, hiring, onboarding, and retaining employees with disabilities – by working directly with employers, including those in federally-regulated sectors, who will be subject to the new regulations. In doing so, it seeks to provide information and evidence into how the regulations can align with Canadian organizations' current equity, diversity, and inclusion strategies and support current accessible employment practices. It will highlight areas where the regulatory framework can both support and reinforce exemplary practices with respect to inclusive employment, as well as areas where it can play a role in enforcing minimum accessibility employment standards.

## **OVERVIEW OF THE RESEARCH**

The project is working directly with employers and disability organizations to identify and test a range of accessible employment practices with respect to recruiting, hiring, and retaining people with disabilities. The project team consists of a partnership between SRDC and MacLeod Silver HR Business Partners that leverages the resources and experiences from the BC Partners in Workforce Innovation initiative (BC WiN). BC WiN provides job matching services and employer capacity supports to employers in British Columbia. At the centre of the BC WiN model is a team of Inclusive Workforce Consultants (IWC) with human resources knowledge and experience that assist employers in hiring and retaining people with disabilities by connecting to a network of employment service agencies for referrals and other supports to meet the employers' needs.

In this project, the IWC team will work closely with a diverse group of employer partners to understand their diversity, equity, and inclusion goals and objectives for hiring more diverse talent, work with them individually to identify the next steps to build their capacity and provide ongoing support as they implement those actions in their organizations. These employers will be part of a Community of Practice (CoP) whose members will share information, best practices, and tools on how to identify and remove barriers within their organizations and business networks. The research team will work closely with the CoP members to capture the steps and additional supports that are required for organizations to implement accessible employment practices effectively in their workplaces.

The project also involves partnerships with national disability-serving organizations, including Neil Squire Society, Magnet and The Discover Ability Network, and the Autism-Intellectual Disability National Resource and Exchange (AIDE), who are engaged regularly through a National Advisory Committee that also includes employers who are committed to accessible and inclusive employment, such as London Drugs. The Committee provides overall strategic direction on the project, recommends other employers to be involved in project phases that will identify and test a range of accessible employment practices, and reviews and provides feedback on the research findings.

The project has formed a working group of people with lived disability experiences (Committee of People with Experiential Knowledge) that meets regularly during the course of the project to review and provide guidance on project activities, research approaches, and findings. The working group is chaired by self-advocate who herself has lived experience with disability. The project emphasizes the importance of including the perspectives of people with lived experience in every stage of the project to include the considerable expertise that people with disabilities have in navigating employment barriers in their own lives, reflecting on their strengths and capacity to find creative solutions to systemic barriers, and how these can be incorporated into both research and practice.

#### **Research phases**

The research is organized according to the following key research questions:

Phase I:	What are the best practices, tools, and approaches to work with employers to develop or implement accessible workplaces?
Phase II:	Working with a group of employers, what is the current state of their diversity, equity, and inclusion goals or plans? What are their specific challenges and opportunities that could be addressed through this project?
Phase III:	Working with a group of employers, what are the conditions and success factors for implementing their chosen diversity, equity, and inclusion strategies and practices? What are the lessons learned?
Phase IV:	Expanding to a larger group of employers, how can best practices and lessons learned be adapted or scaled?

This report focuses on the findings from Phase I of the project to identify best practices and existing approaches in place to hire, engage, and retain people with disabilities in the workplace.

# **METHODOLOGY**

## LITERATURE REVIEW

A literature review targeted towards promising practices and approaches related to accessibility in the workplace was conducted through a search of on-line databases including Google Scholar, Applied Social Sciences Index and Abstracts (ASSIA) and Scholars Portal Books. Search terms included: disability, accessibility, workplace, employment, inclusion, commitment, recruitment, and retention. A preliminary search aimed to generate articles from applied research literature, and then expanded to include theoretical perspectives to offer a critical lens to understanding disability in the workplace. Relevant reports were also located through Internet searches to identify a selection of grey literature sources to provide additional context with respect to the evolving policy landscape of accessibility, and employment in Canada, independent studies that explore employers' perspectives on accessibility, and a range of toolkits and guidance available to employment standards that are either currently in place or under development.<sup>2</sup> The results were filtered based on publication date (published in 2010 or later), and geographic location of the research (North America and Europe).

## **KEY INFORMANT INTERVIEWS**

A total of nine key informant interviews with eleven participants took place between May and July 2021 over Zoom video conferencing software, each lasting around one hour. Informants were selected for the expertise and experience working with employers to address barriers to employment for people with disabilities. These included three specialists and leaders from national disability service organizations, including National Advisory Committee members, and three organizations that bring together supported employment service providers and

Ontario, Quebec, Manitoba, Nova Scotia and – most recently British Columbia – have all introduced accessibility legislation aimed at removing barriers in domains such as customer service and program delivery, employment, transportation, physical environment, and information and communication under provincial jurisdiction. As well, many cities and communities across Canada have created and implemented bylaws, policies, and guidelines to address the barriers to accessibility that Canadians face in their daily lives. While Phase I research findings focus primarily on employer practices and perspectives, the project team also reviewed these statutes, educational materials, and implementation guidance to provide additional context. The research team held informal information-sharing meetings with representatives from the Ontario, Manitoba, and BC governments to share perspectives on challenges and opportunities employers face in achieving more accessible and inclusive workplaces.

organizations representing employers to help workplaces become more inclusive and hire more diverse talent. Informants also included three people with lived experience – one serving to connect employers to diverse talent, one serving as co-chair for an Employee Resource Group with a federally-regulated employer, and one organizational specialist with experience leading diversity, equity, and inclusion initiatives in the higher education and communications sectors. Informants also included one subject matter expert in workplace standards development.

A semi-structured interview protocol was prepared to explore informants' experience working to address accessibility in the workplace, their views on employers' current capacity to adopt more inclusive approaches to hiring people with disabilities, and their reflections on promising practices, key factors to success, and how employment standards might impact employer behaviour. Informants were also asked to reflect on some of the challenges employers face in approaching workplace diversity, equity, and inclusion. Interviews were transcribed and analyzed in NVivo software with the view to surface results-based actions that could be further explored and applied in the next phase of the research project working directly with employers.

# **PHASE I FINDINGS**

## THE FOUR PILLARS OF ACCESSIBLE EMPLOYMENT

The following summary of findings for Phase I activities is organized by a practice-based framework developed by BC WiN referred to as the "Four Pillars to Accessible Employment". The IWC team is using this framework in their work with employers to identify and implement a range of accessible recruitment, hiring, and retention practices. These Four Pillars – Commitment, Readiness, Recruitment, and Retention – emerged through the IWC team's work with employer partners, service partners, government, and educational organizations to identify results-based actions in the recruitment, hiring, and retention of people with disabilities (BC WiN, 2018). In essence, it is providing the project's employer partners with a roadmap to identify areas of opportunity to improve processes, capabilities, and supports to help them achieve a more diverse workforce.

#### Figure 1 The Four Pillars of Accessible Employment



The Four Pillars focus on organizational conditions and behaviours (i.e., Commitment and Readiness) that are necessary for successful recruitment, hiring, and retention practices. By

positioning Commitment and Readiness as the first two pillars, the Four Pillars enables the IWC team to communicate to employer partners that it is critical that they have in place a solid foundation of commitment throughout the organization and that they have taken the necessary steps to prepare their workplaces to be inclusive before engaging in recruitment. Each of the pillars includes a detailed series of considerations to help employer partners implement specific strategies and practices to ensure that the recruitment, hiring, and onboarding process provide for accessibility and inclusion at every point in the employment lifecycle. The Four Pillars provides a holistic approach to supporting employers to identify and address any areas for improvement in their human resources and workplace policies and practices before they begin the recruitment process.

Given the positive experience of the IWC team's use of the Four Pillars to help guide employers and build capacity for accessible employment practices, the research team elected to use it as a tool to organize research findings in the literature and the key informant interviews. The discussion below identifies where the action items and practices within the Four Pillars were supported by the research literature and highlighted in the perspectives of key informants.

#### Commitment

Improving employment outcomes for people with disabilities is strongly tied to employers' commitment to creating effective disability policies and implementing organizational changes (Parmenter, 2011). In the IWC team's application of the "Four Pillars," a clearly expressed commitment to diversity, equity, and inclusion of people with disabilities and to address workplace barriers is the foundation for all subsequent actions, as it signals an employer's willingness to implement changes. Employers can express their commitment to diversity, equity, and inclusion in several ways, such as "including disability in the organization's diversity statement; including people with apparent disabilities in the company's promotional material; and encouraging applicants with disabilities on recruitment materials" (von Schrader et al., 2014, p. 253).

However, it is important to note that commitment alone does not always lead to increased rates of hiring among people with disabilities (Kuznetsova & Bento, 2018). In fact, there is often a discrepancy between employers' stated commitment to diversity, equity, and inclusion and their actual implementation of such strategies (Kahn et al., 2019). As identified in the Four Pillars and in the literature, a strategic plan helps to bridge intention and action, by outlining how the organization can approach different aspects of disability inclusion policies, and to establish measurable goals to track progress (Curtis & Scott, 2004). These plans can also serve as a tool to build awareness on how accessibility and inclusion of people with disabilities provides long-term benefits to organizations, for example, through improved employee morale, increased profitability, and enhanced public opinion (Houtenville & Kalargyrou, 2012).

Despite the importance of commitment to improving employment outcomes for people with disabilities, in interviews with key informants, one interviewee noted that many employers have not yet dedicated the time or resources to developing the strategic plans or policies that create the foundation for accessible and inclusive hiring:

"I would argue that most employers don't feel like they need to have an accessibility strategy or accessibility plan... It hasn't even been part of the conversation outside of 'oh, yeah, maybe I guess we need to make a plan for how our buildings are more accessible.' And usually, if I have seen a plan, it's usually related to physical space only."

In general, informants highlighted the continued need for employer education and engagement to inspire initial organizational commitment, beginning with leaders and stakeholders within the organization. As reflected in the Four Pillars, the Commitment stage includes the engagement of key stakeholders, including unions, human resources personnel, and organizational leaders, to raise awareness and drive diversity, equity, and inclusion strategies and plans. It also recommends establishing or involving an Employee Resource Group to ensure that people with lived experience can contribute to the diversity, equity, and inclusion vision, goals, and plans of the organization. One informant described the importance of engaging stakeholders across the organization, while also ensuring the involvement of people with lived experience at an early stage:

"When you talk to people about accessibility, often... it has to be top-down, there has to be buy-in, and it has to be driven strategically throughout the organization. Then you have another camp, like change only happens from the bottom up. I personally think you need to have both, but the area of influence that you have the most impact is in the middle. If you can get your middle manager on board, if you can get those guys driving that change... that's where you're going to have the most importance.... [A] key cohort of people on the ground who are connected and who are willing to like, share or talk about their experiences, that has to be one of your keystones and first things that you build... They don't have to be super activist. They don't have to be super mobilized. But if they're not there, I think you can't do the work either. So that's why I think it has to be both."

As employers establish their diversity, equity, and inclusion strategies and commit themselves to hire and support workers with disabilities, there is often a need for further guidance, often from employment service organizations or other support services. Interview findings highlighted the need to build connections between organizations working with people with disabilities and employers. One informant commented that employers are often unaware of how service providers can help them address accessibility in the workplace through different stages of the employment lifecycle: "I think the biggest thing is that employers just don't realize that service providers will go in, will help with the training, that there's no cost associated with it, that they'll help with the onboarding process. They kind of think that they have to do it all by themselves. And I think it's just a lack of knowledge on the employer's part of what these organizations can help them with."

The Four Pillars includes engagement with community and service organizations in this Commitment phase, to undertake intentional and active engagement with such partners to support diversity, equity, and inclusion plans and goals. Similarly, the research literature emphasizes the importance of connecting employers and service organizations to help identify and recruit candidates, and guide hiring practices (Kalargyrou & Volis, 2014; Kalargyrou, 2014). Employment service organizations supporting people with disabilities can provide employers with practical and tangible tools to help support employees at all stages of the employment lifecycle, as well as help match employees with the right position, and connect both employers and employees with the external resources and supports.

### Readiness

According to a study of disability inclusion factors, "preparedness was the most predictive of the reported employment rate of people with disabilities in the companies surveyed" (Iwanaga et al., 2021, p. 46). A lack of readiness and planning can have negative impacts on employees, as organizations may not have the resources and skills to overcome difficult or unexpected situations (von Schrader et al., 2014). The IWC team approaches the preparation of organizations to hire diverse talent under the pillar of 'Readiness' with actions that focus on mobilizing plans through a diversity, equity, and inclusion leader; enacting a change management process to identify and address barriers in the organization's hiring practices; training and education to support an organizational culture of inclusion; and reviewing and modifying key components of the recruitment and hiring process to remove barriers (e.g., reviewing and modifying application, screening, interviewing processes and guides, and other policies and practices).

The importance of addressing bias throughout the organization is emphasized under this pillar of 'Readiness' – before initiating or expanding the recruitment of diverse talent. In the interviews, informants reported that employer attitudes represent the most significant barrier for hiring diverse talent, where negative stereotypes about people with disabilities, concerns about the costs of accommodations, and the fear of legal liability were cited as common sources of misconception and bias. While such concerns have been dispelled with evidence-based responses demonstrating costs of accommodations to be low and perceived legal issues to be unfounded (Bonaccio et al., 2020), informants noted that nevertheless, employers are often

making decisions based on such faulty assumptions and argued for the importance of employer education in this context:

"My impression is that the biggest disconnect is that employers make policy assumptions about what an accommodation actually is, how much accommodation is going to cost... Often, it's not like someone has looked into it and then decided, 'oh, no, this is not for me. I don't want to hire [people with disabilities]'. It's that they've never thought about it or they're making assumptions based on television or movies or whatever. And they just aren't... it's an education piece rather than a willingness piece or an actual opposition piece. That's my impression."

As the role of bias becomes more understood in the maintenance of systemic barriers and discrimination of people with disabilities, some commentators recommend a shift away from the focus on the economic business case argument for employment of people with disability, towards a strategy that addresses the unconscious bias undermining employment of people with disabilities (Murfitt et al., 2018). Unconscious or implicit bias refers to the ways in which social behaviour is largely influenced by unconscious associations and judgements. Everyone is affected by attitudes and stereotypes that influence our understanding, actions, and decisions since we are naturally included to search for patterns, rely on mental short-cuts, and draw from normative associations. However, because these processes are often recalled automatically, it makes them difficult to identify, but all the more necessary to do so and change (Banaji & Greenwald, 1995, 2016). Indeed, the very nature of positioning a person with a disability as a "lack of ability" may influence these continued misperceptions and negative associations concerning disability management and productivity (Bonaccio et al., 2020).

The IWC team's work with employers on organizational readiness emphasizes training and education to support disability awareness across the organization to address unconscious bias. Likewise, other informants interviewed who work with employers noted that a "baseline of supports" have to exist prior to engaging in hiring people with disabilities, which include training and education across the organization. However, informants also highlighted that such training is often ineffective unless it is meaningfully applied in the day-to-day actions of employers, and the research literature has pointed to the importance of addressing translational gaps in such anti-bias training (Hagiwara et al., 2020).

One informant highlighted an example in which an employer went beyond offering employee training that address unconscious bias in the workplace, to applying that learning within their day-to-day activities. The example emphasizes how the employer actively engages with a range of practices highlighted in the 'Readiness' pillar – from reviewing processes to actually embracing accessibility and inclusion within the culture:

"One [organization] that has done a lot of really great work... they definitely have Employee Resource Groups [and] they have done work on their processes. They have staff that are actually allocated to the work, and they have a culture of like really applying their knowledge... They don't just do a workshop on unconscious bias. They actually work. At the beginning of meetings, [they will] have discussions about 'what kind of biases might I be bringing to this context?' So, they're really applying the learning and addressing those attitudinal or unconscious bias pieces that more of the culture and the relational barriers that come up. That's very advanced in my mind. That's not just about how you write a policy or how you how you alter your practices as an employer. But it's also about giving people the freedom to really internalize the framework or get at the less tangible pieces that are hard to call anyone on and know that they will have issues with."

#### Recruitment

Despite recognizing the business advantage of hiring people with disabilities, studies of Canadian employers note that they fail to do so, often citing that they do not know how to target recruitment strategies to people with disabilities or often indicate difficulty finding qualified applicants for their openings (Brisbois, 2014). Employers are often unaware of how certain recruitment practices can exclude people with disabilities who may be otherwise qualified for the position, such as a physical location that is inaccessible, or assessment and screening processes that may be problematic for people with disabilities (Kulkarni & Lengnick-Hall, 2012). In practice, the Four Pillars addresses each step of the recruitment process from actively targeting advertised positions and working with service organizations to seek out candidates with disabilities, to addressing barriers within the application, screening, and interviewing process.

Based on the IWC team's experiences supporting employer recruitment activity, the Four Pillars model also emphasizes ways to promote proactive disclosure processes and build candidate pools for high demand occupations and continuous openings. However, in both the research literature and in the key informant interviews, it was noted that many people with disabilities are unwilling to disclose or request accommodations or adjustments within the recruitment process due to fear of discrimination: "Scholars and activists argue that what makes a person's impairment a disability is when they disclose their disability when applying for jobs, and organizations frequently believed the job to be beyond their ability" (Keynes & Fielden, 2020, p. 497). Employees with disabilities fear that disclosing will lead to outcomes such as retaliation, slower progression, and less meaningful roles (Accenture, 2020). In one study, the decisions people with disabilities made about disclosure were based, in part, on employer/organizational characteristics, and their perceptions about the "disability-friendliness" of the culture (Jans et al., 2012).

The research literature also notes that disclosure of disability in an employment context involves complex personal decisions, and there are a range of tools, resources and supports for people with disabilities to navigate these decisions with an understanding of their legal rights and the employer's responsibilities. One informant discussed their organization's approach to disclosure in terms of counselling people with disabilities but noted that employers must play a role in creating a safe space for them to do so. The informant noted that while there was a wealth of publicly accessible information for employers to access on the topic of disclosure, in most cases it hadn't been applied:

"Part of what we teach is... what you do disclose to an employer? Especially in the interview process... In general, we encourage people to be as candid as possible, but also tell them what they can do, what they personally can do as a person with a disability... [there are] excellent guiding principles that every employer should [have in place] ... but you know, what employers going to read those and then internalize them and action them?"

To this end, the pillar on 'Recruitment' offers a range of actions employers can take to ensure that people with disabilities are offered a supportive environment and proactively offered opportunities for accommodations and adjustments throughout the recruitment and hiring process. These include actively encouraging candidates with disabilities to apply to vacancies through targeted outreach or diversifying sourcing options, ensuring that interview styles and approaches are barrier-free and connecting with resources to identify adjustments and accommodations, as well as promoting open discussions about workplace adjustments that include a consideration of barriers in the job design (e.g., work from home, flexible hours, and job shaping).

Findings from the literature review highlight employers should review recruitment practices and processes for a range of barriers, such as ensuring that recruitment websites are accessible (Scholtz, 2020). However, it is also important to emphasize that barriers in the recruitment process can also include language, use of behaviour-based interviews that present barriers for neurodiverse candidates (Patton, 2019), and inflexible job requirements (i.e., inflexible hours, no work from home provisions). In fact, according to findings reported through the Canadian Survey on Disability, 2017 the most commonly required type of workplace accommodation was flexible work arrangements, with 27 per cent of respondents with disabilities aged 25 to 64 years old reporting such a requirement, followed by workstation modifications at 15 per cent, and human or technical supports at 6 per cent (Morris, 2017).

In one interview, an informant reflected on practical ways in which employers can foster a supportive environment to encourage disclosure, if required, while also allowing candidates to feel comfortable approaching these decisions at any point in the employment lifecycle (i.e., not necessarily at the interview stage):

"I think what would be excellent, and I'm not saying that this is the answer or the solution in all cases, but if someone can go to work and not be forced to disclose because an environment is so inaccessible, but if you can offer a flexible workspace that someone actually might not need to [disclose] or have the flexibility that someone can disclose a disability or ask for accommodation as needed on a later basis, not in that first interview, I think something like that is more important. I think there are certainly cases where you do need to disclose. But I think that having that flexibility built into a workplace, in really trying to change your environment, is super important."

For another interview informant, flexible work arrangements that flourished as a response to public health restrictions during the COVID-19 pandemic contributed to important ways of removing barriers and normalizing these types of adjustments or accommodations. However, the informant also acknowledged that organizations might only view flexibility as a temporary measure and that formalized workplace policies or employment standards could play a role in addressing lack of flexible work arrangements as a key barrier:

"I'm seeing a lot of job postings that say this is temporarily remote, but you need to be ready to come back into an office... And so, I'm really worried that I thought we'd see more uptake of [flexible work arrangements] as an enduring practice. But it just kind of hits me in the heart socket to think that when there was a business need for it, it was doable in a heartbeat. And as we move away from that being a business requirement, again, there's a real risk that we're going to backslide... It's the discretion of business to do what they want. And so, it's like there need to be more carrots. But I do feel like there probably needs to be a stick... I do think that there's definitely a role to play when we're making this more required as opposed to discretionary."

#### Retention

Given that the Four Pillars model focuses on building employer capacity to recruit and hire people with disabilities and providing job-matching services to connect people with disabilities to employment, their practices on the 'Retention' pillar emphasize ways in which employers can identify and remove barriers within the onboarding process to set up new employees for success. A key condition under this pillar is that "adjustments are in place on Day 1," highlighting the employer's responsibility to seek out how else to support their new employees, not only through physical accommodations, but through appropriate onboarding and learning supports as well (e.g., including a Job Coach during onboarding, incorporating different ways of learning such as task-lists or visuals for people who are neurodiverse). Informants shared a number of examples that highlighted the importance of employers being proactive in this regard. One informant described a situation in their organization where a colleague had hired a person who uses a wheelchair but hadn't been trained on best practice for setting up this person's workstation, resulting in challenges when the employee started their position. This example led to the organization working with the Employee Resource Group to address effective accessibility and inclusion onboarding training for hiring managers, with access to additional resources across regional locations to ensure appropriate adjustments were put in place proactively.

By contrast, another informant highlighted what employers can do to ensure that opportunities to request adjustments are incorporated into the onboarding process:

"When I started at [my job] as part of their onboarding process... they're like coordinating to ship me all my computer equipment, they said 'here is your standard list of technical equipment that we provide to our employees, do you require any adaptations to this list, if so let us know what you need, and we'll provide it.' And what was really cool, is that in most cases, I think that conversation only happens after... 'Oh, and now you're here. And now I have to think about buying you the stuff that you need or only get it if you ask for it,' whereas there's like an invitation to share."

Beyond supports during onboarding, the pillar of 'Retention' also recognizes the importance of longer-term retention strategies that include building momentum and growing diversity, equity, and inclusion capacity throughout the organization. It highlights the importance of recognition for internal champions and ensuring that capacity exists beyond human resources "specialists," as well as participating in community events to celebrate progress on accessibility and inclusion. The 'Retention' pillar includes actions to sustain a culture of inclusion that emphasizes the incorporation of diversity, equity, and inclusion measures into employee engagement surveys and in performance management processes, to ensure that all employees are engaged and responsible for the contributions to an inclusive and accessible workplace.

Additionally, informants noted that there is a need to approach accessibility throughout the employment lifecycle in a holistic way, where new employees with disabilities often lack the role models and mentors that play an important role in their own performance and career progression:

"I think it's just the starting point of the conversation [where] people might consider advancing people in their careers... One change we are seeing is we are seeing more people with disabilities sitting on the board of directors, which is lovely, but we're not there yet. And I think we're not there until we see our workplaces with the same composition of people with disabilities that exist within Canada." Beyond the clear need for workplaces to be representative of people with disabilities at all levels of an organization, informants also highlighted the importance of sponsorship – those leaders in the organization that go beyond championing diversity, equity, and inclusion or acting as mentors that provide advice – to actively seeking and providing opportunities for advancement to people with disabilities:

"I find the higher up you go and organizations, the quieter people are about their identity and being a person with a disability... I'm really thinking about recently is sponsorship within organizations... [S]ponsorship is someone who is in a role [that is] going to lift you up and bring you to the table, who is going to talk about you in those circles that you may not have access to... I would like to be able to get to a point where we're mature enough to go beyond hiring. Like hiring is a huge piece, but I try to encourage people to think backwards, that we think about like recruitment, hiring, onboarding, retention, promotion and then exist, in terms of the employee lifecycle. I think if you want to retroactively amend your organization to be more flexible, you actually have to start with the people who are there and then branch out rather than just try and get a bunch of disabled folks into your organization and hope that they fit into the processes that you have right now."

## **KEY THEMES ACROSS THE FOUR PILLARS**

While the above discussion demonstrates the alignment between our research findings and how the Four Pillars framework offers a way for the IWC team to engage with employers to address key workplace actions, the literature and key informant interviews also identified a number of themes that are relevant across all pillars. That is, key themes that are important for employers no matter where they are on their journey of creating more accessible and inclusive workplaces. These are: adopting the social model of disability, processes that actively engage with people with lived experience, the effectiveness of businesses sharing their experiences and "what works," and the importance of approaching diversity, equity, and inclusion with strong accountability measures, as well as in the spirit of continuous improvement.

### Social Model of Disability

In our interviews, informants noted that there was generally a lack of understanding of a social model of disability amongst employers, which traces the locus of disadvantage or restriction of activity to social arrangements and institutional norms that, while in themselves are alterable, require a reorientation away from the individual's "difference" and towards a model of collective responsibility (Goering, 2015). The social model of disability was strongly emphasized in the

public consultations leading to the *Accessible Canada Act* where, "anything that prevents or limits people with disabilities from being fully included or able to do the same activities as people without disabilities, should be considered a barrier" (ESDC, 2017).

While an understanding of the social model of disability is required to orient employers to the work of addressing barriers at all stages of the employment lifecycle, informants noted that this is not a mainstream concept in the business world:

"It's so strange because the social model of disability is something that's been around for so long. And I think people who are working in the disability field, it's old hat, right, [it's] something that we talk about all the time. We've played with these ideas throughout our careers. And then you step outside of the disability world and people are like, what's the thing? And you have to explain these ideas again from the ground up... Once people hear it, they're really open and receptive to it. But this is just not an idea that's in mainstream society, I think. And so, again, you go back to the education phase... Just exposing people to these ideas and usually once they're close to the idea, it's not a hard sell and they've honestly never thought about it before.

In practice, this lack of understanding of how barriers are socially constructed can have negative consequences on people with disabilities, as employers continue to implement policies and processes that are more reflective of a medial model of disability, that holds that "a person's functional limitations (impairments) are the root cause of any disadvantages experienced and these disadvantages can therefore only be rectified by treatment or cure" (Crow, 1996). A medical model of disability generates assumptions about what counts as "normal" (Perju, 2011) and narrows the focus of accessibility and inclusion efforts to physical adaptations or accommodations for the individual, often shifting responsibility back to the individual to produce a justification or medial "proof" that such an adjustment is required. One informant shared the following:

I have a personally a quite a big issue with the way that disability management currently functions in organizations. It relies on medical documentation [which] I think really take away from our opportunity to be inclusive and accessible employers... You know, I think about my own experience, I'm hard of hearing and I have multiple invisible disabilities, if I were to ask for accommodation and someone were to say, well, prove it, I've been disabled my whole life, I don't have documentation for this. Like I can maybe find my last audiogram when I got fitted for my latest hearing aid if I still have it. But that's not going to help you help me have the best experience. And by the time I get all that, with the message that you know, I have to prove that I need something out of the ordinary. And then and then you're going to decide whether or not you grant it to me, though, that I think it is a big issue, especially when we think about employment. Informants also offered practical suggestions of how to put a social model of disability into action. As highlighted in the above discussion, normalizing flexible work arrangements and ensuring that workspaces were purpose-built with flexibility were important ways to remove common workplace barriers without having a person with a disability show proof that such flexibility is necessary. Informants also recommended that organizations should have dedicated resources in place for employee adjustments or accommodations to avoid situations where individual supervisors or managers felt pressure in justifying expenditures for team budgets. In addition, one informant detailed an example where, in addition to a centralized accommodation fund, their organization implemented a streamlined process where an employee did not have to access a "chain of approvals" (i.e., requests to a manager, to human resources, and so on) to request an accommodation, offering more flexibility and autonomy about the employee's decision with respect to disclosure.

### Nothing About Us Without Us

A core principle within the *Accessible Canada Act* is that "people with disabilities must be involved in the development and design of laws, policies, programs, services and structures" (*Accessible Canada Act*, SC 2019, c.10, s.6(b)). The meaningful inclusion of people with lived experience in the decision-making process is integral to creating accessible and inclusive workplaces, captured by the motto used by disability justice movement, *Nothing About Us Without Us* (Charlton, 1998) and a core principle of the UN Convention on the Rights of Persons with Disabilities.

Informants conveyed that organizations that were successful in their diversity, equity and inclusion efforts shared the essential practice of including people with lived experience at all stages of their work and had strong mechanisms for soliciting and applying employee feedback:

"It is also about listening to employees and incorporating the voices and perspectives of your employees with disabilities. So, the employee resource groups or other mechanisms for hearing from people with experience of employment and disability are really important to being successful. And when I see those organizations that do seem to be doing well in this, it is partly about listening. They have good mechanisms for listening to their employees and they're valuing the experience of employees with disabilities in significant ways that help inform where they're going."

The importance of Employee Resource Groups and including people with lived experience is emphasized within each of Four Pillars framework, to contribute at all stages to a diversity, equity, and inclusion plan and its implementation, as well as providing an important mechanism for new employees to connect with peers and mentors with lived experience. Although Employee Resource Groups can take on different mandates and roles within an organization, they are generally composed of employee volunteers that provide a forum for people with lived experience to have a voice on organizational matters that impact them directly. The benefits of these groups are well-known, including contributing to increased employee engagement and retention, as well as contributing to education and training efforts of the organization on diversity, equity, and inclusion practices (Bonaccio et al., 2020).

In the key informant interviews, one informant described the evolution of their organization's Employee Resource Group, from identifying and removing key barriers within the workplace, designing and delivering education and awareness training, to developing new and innovative ways of increasing pools of diverse talent. The informant described that the Employee Resource Group proposed and designed a 12-week paid work placement for people with disabilities to gain work experience and potentially be placed within full-time positions. Experiential work opportunities such as working interviews, internships and placements are featured in the 'Recruitment' pillar as effective ways to eliminate hiring barriers and have been highlighted in the research literature as mutually beneficial for both employers and candidates (Murfitt et al., 2018). As the informant noted in this example, the success of the placement program was attributed to the partnership between the Employee Resource Group and senior management to collaborate effectively:

"So having an executive management team be part of that was really big... it was almost a first for [our organization] where a stakeholder group joining with an executive team to really bring things to the top. And I think that's a lot of why it was so successful. So, there's been a lot of talks between us and the executive team... Our side has the lived experience, our side has the coaching and the ability to connect those who come in with disabilities... and then the executive team has been fantastic in sort of retooling everything, we've actually now got two managers who are dealing exclusively with... disability and inclusion within the [the organization]."

This example also highlights the importance of ensuring that while people with lived experiences are included in decision-making processes, it is not up to people with disabilities alone to drive change within their organizations or educate their peers. As one informant explained, it is important to balance both lived experience and expertise to ensure shared responsibility for accessibility and inclusion within the workplace:

"I'm trying to figure out a balance because I don't want to put all the labour and the invisible burden on people with disability to talk about their lived experiences. So, I'm bringing all the experts in the room, but I don't want the experts to be making decisions without the input of people who are going to be impacted by officials."

### Business to Business Co-learning: Employers Learning from One Another

To address these issues of balance, findings from this phase of research also highlighted the importance of employers learning from (and with) one another. As noted in the above discussion, employers can benefit from intentional partnerships with service organizations to build effective policies and practices. Equally, service organizations that serve people with disabilities can benefit from employers and employer organizations to learn how to frame their work appropriately for a business audience:

"It's good for us to know how to kind of speak business language and how to sell what we're doing to employers and what employers want to hear about what [service organizations] can bring to a business... It really depends on the service provider organization. I think some work with a lot of employers, they're well connected in the business community and others aren't connected as well with these. I think one of the biggest things we've been trying to promote is employer networks like Chambers of Commerce... They know employers in that region. They know what employers are looking for. So, getting service providers connected with them, we feel is also really important."

Informants also highlighted that there are opportunities to learn from employers of different sizes and contexts. For example, while several informants noted that small and medium enterprises (SMEs) often require specific guidance and additional resources due to lack of inhouse human resources and legal expertise, large enterprises can equally learn from SMEs to identify and remove workplace barriers through more responsive and flexible approaches:

"Why we like [small employers] is they have a much better general sense of accommodation and maybe not around specific things like technology and ergonomics. But, you know, maybe doing a split, like splitting a job or starting someone a little bit later in the day because of their [personal care/attendant care]... They are a lot more nimble around this stuff, you know, and you ask them about whether they'll entertain job shaping and look at you 'like what?' you know, and then you start to explain it and they go, 'oh, we do that all the time.'... So, there you know, the concept of splitting a job up or having someone work different kinds of hours generally is not a stretch for a lot of these smaller organizations."

As the above example illustrates, while employers have different needs, the size of the employer is not necessarily a prohibitive factor in their ability to implement accessible policies and practices (Mandal & Ose, 2015). Instead, the research literature emphasizes that employers first want to ensure that increased accessibility and inclusion practices can also be reflective of business context and needs. When working with service organizations or specialists, employers seek out tailored solutions: disability awareness training, assistance with developing inclusive policies, and procedures for addressing barriers in the workplace all benefit from reflective of the employer's context (Murfitt et al., 2018). Business-to-business learning and exchanges offer this understanding of context that is often more impactful than other forms of information. As one informant highlighted, businesses may be more receptive to learning and applying such accessible and inclusive employment practices when they see how it works for others:

"So if I were to advocate or if I were to try and push the increase of people with disabilities in the workplace, I would do exactly what you guys are doing, like work with [employers]... get some nice examples of how this can work that are easily communicated to people... Businesses might look at [my service organization] and I can say, 'yeah, this is how you should accommodate.' And they're going to look at me and be like, 'yeah, but you're a charity and you're small and you are not dealing with warehouses of goods. So, what do you know?' But if [a business] says, 'hey, this is how you should accommodate and [this is how] it works for us'... that's something."

### Transparency and Accountability

Beyond the importance of driving change through the learning and the celebration of "success stories," the literature and informant interviews also underscored the importance of transparency and accountability. Organizational self-reporting processes ensure that employers are accountable to their employees and contribute to better internal policies by transparently identifying and addressing employees needs (Khan et al., 2019).

In practice, the Four Pillars model highlights the importance of establishing accountability and performance metrics as part of 'Commitment', collecting data to benchmark current representation during 'Readiness', setting hiring targets and monitoring progress during 'Recruitment', and incorporating diversity, equity, and inclusion goals in employee engagement surveys and performance management practices for all employees in 'Retention'. The IWC team also highlights the importance of including diversity, equity, and inclusion performance metrics for managers and leaders to ensure accountability for change.

Interview informants described effective examples of building transparency and accountability in the hiring process. In one example, a formal challenge function mechanism was put in place for all hiring decisions, where a hiring manager had to formally describe the steps taken support the organization's goals for hiring diverse talent. The informant described that these mechanisms for transparency and accountability were especially important in large organizations where managers may exercise a large degree of discretion in hiring decisions:

"You need to people need to know that they're going to get challenged if they keep getting great candidates that happen to have disabilities and people that have been brave enough to share that in the recruitment process. And then they go with the person that they think doesn't have a disability. They need to be held to account for that. They need to know that someone's going to challenge that."

Informants also pointed to other examples of promising practices with respect to accountability and transparency of employers' diversity, equity, and inclusion efforts. For example, a BC-based consortium of employers, The President's Group, recently launched their 'Pledge to Measure', initiative to improve the representation of people with disabilities in the workplace. All 25 companies, which collectively employ over 50,000 British Columbians, will begin publicly reporting the number of employees and senior leaders with disabilities within their organizations as a way of inspiring more businesses to increase inclusive hiring practices, remove barriers to employment, and provide leadership in accessible workplaces (President's Group, 2021). As one informant noted, such initiatives help fill key data gaps across employers in Canada, and also provide a means of concretely monitoring progress: "if you can measure it, you can manage it."

Informants also underscored that since measurement relies, in part, on employees selfidentifying as having a disability, effective accountability measures rely on the supportive and inclusive workplace cultures. As noted in the research literature, people must feel safe in their disclosure/self-identification, and accountability practices should also be developed alongside effective policies on data collection, privacy, and employee confidentiality (von Schrader et al., 2014).

#### Continuous Improvement

While the Four Pillars has been a useful framework for engaging employers in the work of diversity, equity, and inclusion, with concrete steps that progress in a linear fashion, many commentators agree that such practices should be approached in the spirit of continuous improvement, with consistent approaches to monitoring and re-evaluation that revisit practices identified in the Four Pillars in a more iterative way. As noted in the literature review findings, organizations must go beyond creating a supportive and inclusive work culture through willingness to learn, try new ways of working, and reaching beyond one's "comfort zone" (Lindsay et al., 2019). As many of the informants we interviewed noted, organizations simply do not know how to talk about disability openly and are afraid of trying for fear of offending some with a disability or encountering a charge of discrimination. As a result, they avoid taking action altogether.

To build disability confidence as an organization, which is the suite of knowledge and skills employers require to work effectively with people with disabilities, to understand and implement workplace adjustments, and to create inclusive workplaces (Lindsay et al., 2019), informants noted the importance of framing the work as a learning process:

"It's kind of [a situation of] 'I don't even want to go there because I'm scared of getting into trouble.' So that is the caution that I will have, how to communicate these [accessibility practices] ... to position it as a way of improvement..."

One of the most effective ways of increasing disability confidence across all levels is through positive experiences working with people with disability (Murfitt et al., 2018). Since recruitment can still be viewed amongst employers as too much of a "high risk" approach to build that confidence, the research also notes other ways organizations can approach this process, through volunteering, mentoring, and internship programs (ibid). Building this confidence is a key aspect this work, as it focuses on building employer capacity, while also ensuring that job matching services fit employers' business needs. As one informant noted, bad employment experiences or poor organization, job, and candidate "fit" lead to both jaded employers and job seekers and can do "more harm than good." Instead, an important aspect of supporting accessible employment was about "helping the whole sort of ecosystem by having employers have a good experience with a person with a disability."

## DISCUSSION

Through the exploration and application of the Four Pillars of Accessible Employment, the findings surfaced a number of ways in which employers can, with guidance, remove barriers in recruitment and retention, with actionable and practical steps that are readily understood. Evidence gathered from the broader research literature and key informant interviews was important in validating the Four Pillars framework, as well as contributing additional elements and strategies that the IWC team could emphasize and apply in their work with employers to build their diversity, equity, and inclusion capacity. As an emerging, practice-based framework, the Four Pillars has served as a valuable structure for summarizing and consolidating these findings, which the project team will be exploring further as it applies the framework in its work with a group of committed employer partners in subsequent research phases of the project (*see Table 1 for details*).

#### Table 1 Four Pillars of Accessible Employment

## Commitment: Building a foundation for inclusion

A commitment to be inclusive is made, supported, and communicated by senior leaders	Employment opportunities exist or are created	Diverse talent pool is valued and there is a focus on ability in relation to the job	Explore and develop community partnerships
<ul> <li>Establish the core Inclusive Workforce Committee</li> <li>Create a terms of reference with all stakeholders</li> <li>Set vision, goals, and strategic plan</li> <li>Include employees with lived experience in planning activities</li> <li>Engage union to support DEI plan</li> <li>Develop the DEI statement</li> <li>Be transparent – establish accountability and performance metrics</li> <li>Commit to resources, headcount, and budget for training</li> </ul>	<ul> <li>Opportunities are identified throughout the employment lifecycle (i.e., development, promotion, return to work)</li> <li>Consider paid Internships, Co-ops, Casual and customized positions to augment FT, PT or Temporary roles</li> <li>Explore ways to build a candidate pool or talent pipeline</li> <li>Review procurement practices to ensure diversity in sourcing and vendor relationships, especially Temp agencies</li> </ul>	<ul> <li>Recognize that barriers are 'socially constructed' and need to be identified and removed</li> <li>Establish, involve, and continue to support an Employee Resource Group (ERG)</li> <li>Train HR and organizational leaders to raise awareness and drive the strategic plan</li> <li>Identify ways to communicate the organization's commitment to inclusion externally (e.g., website, job postings, careers page)</li> </ul>	<ul> <li>Research and partner with community organizations to help with readiness activities and for diverse talent referrals</li> <li>Undertake intentional and active engagement with partners to support inclusive hiring goals</li> <li>Seek out and learn from other inclusive businesses (e.g., PG in BC)</li> </ul>

## Readiness: Preparing organizations to be inclusive

Designate a DEI lead to facilitate the strategic plan with the leadership team	Apply a change management process to prepare hiring managers to shift practices	Training and education to support skills development and a culture of inclusion for leaders and staff	Develop recruitment best practices to hire people with disabilities
<ul> <li>Clarify roles, responsibilities, resources, and services offered to support managers</li> <li>Identify and facilitate addressing barriers to employment</li> <li>Formalize funding for employee accommodations</li> <li>Develop and deliver the communication plan so all employees are aware</li> <li>Liaise with DEI leads in other organizations to learn and share best practices</li> <li>Connect with external consultant or other resources, if needed</li> <li>May liaise with community partners and the recruitment team</li> </ul>	<ul> <li>Collect data to benchmark current representation</li> <li>Conduct an accessibility audit to identify and remove physical barriers (e.g., RHF)</li> <li>Seek input from and involve the ERG on key readiness activities</li> <li>Conduct job evaluation to identify potential restrictions and improvements</li> <li>Choose empowering language around disability (e.g., diverse abilities, adjustments) Reassess organizational needs, barriers, policies on an annual basis</li> </ul>	<ul> <li>Identify needs, source, and provide training to support a culture of inclusion</li> <li>Include people with lived experience</li> <li>Foundational training to include organizational commitment, disability awareness, business advantages, practical solutions to recruitment and retention</li> <li>Address unconscious bias and how it impacts employment</li> <li>Train on ways to create a safe, caring culture of inclusion to 'normalize' and promote greater disclosure</li> </ul>	<ul> <li>Help recruiters and hiring managers identify and adapt potential unconscious bias in the hiring process</li> <li>Review application and onboarding practices</li> <li>Review and modify interviews guidelines, pre-employment testing and evaluations (e.g., for people who are neurodiverse)</li> <li>Revise Job Descriptions, career site postings and interview assessments for inclusive language</li> <li>Review EAP and wellness programs for inclusive supports and practices</li> <li>Adjust recruitment policies and practices, as needed to remove systemic barriers</li> </ul>

Active recruitment of people with disabilities for position vacancies	Engage different interview styles and approaches	Proactive disclosure of abilities in relation to the position	Build candidate pools
<ul> <li>Position diversity as an asset and actively encourage candidates with disabilities to apply</li> <li>Diversify sourcing options, techniques, and resources to reach the talent pool</li> <li>Consistent outreach to recruitment partners to source applicants</li> <li>Participate in community job fairs, virtual or in-person</li> <li>Request candidates with disabilities from recruitment and temporary help agencies, if used</li> <li>Set realistic, yet stretch recruitment targets (e.g., 25% of group hires)</li> </ul>	<ul> <li>Focus on setting candidates up for success with approaches that meet diverse needs of applicants</li> <li>Use working interviews, practicums, and work trials</li> <li>Encourage and welcome Job Coach participation in interviews, if required</li> <li>Connect with any Occupational Health and Safety resources to identify internal accommodations</li> <li>Review and adapt reference check requirements</li> </ul>	<ul> <li>Recognize most disabilities are not visible</li> <li>Promote open discussion between employee and employer of any adjustments required to set them up for success</li> <li>Provide and encourage different ways to disclose pre and during the interview process</li> <li>Consider barriers in job design (e.g., work from home, flexible hours, job shaping)</li> <li>Include identified accommodations in letter of offer</li> </ul>	<ul> <li>Develop cohort specific training with community partners and tailor to specific career opportunities</li> <li>Partner with post secondary organizations with programs for students with disabilities</li> <li>Use work experience, internships, Co-ops, and practicums</li> <li>Partner or lead a pilot program for DEI</li> <li>Build a candidate pool for high demand occupations, known continuous openings or positions with group hires</li> </ul>

## Retention: Ensuring full engagement of diverse talent

Ensure a culture of inclusion exists within the workplace to retain talent	Adjustments are in place prior to start	New employee supports and resources	Continue to build internal momentum and capacity
<ul> <li>Support a respectful, psychologically healthy, and safe workplace</li> <li>Set check-ins and seek feedback with new hires</li> <li>Include DEI feedback in employee engagement surveys</li> <li>Incorporate DEI goals in performance management</li> <li>Include people with disabilities in all aspects of the lifecycle of employment (career development, growth, and advancement)</li> <li>Review current performance and succession planning to remove systemic barriers</li> </ul>	<ul> <li>Ensure identified adjustments or accommodations are in place "day 1"</li> <li>Seek out what else would be of benefit, once hired</li> <li>Include a Job Coach, if required in onboarding</li> <li>Incorporate different ways of learning a new job (e.g., task-lists, videos, visuals for people who are neurodiverse)</li> <li>Be flexible and curious to bring out each individual's ability to contribute at their highest level</li> </ul>	<ul> <li>Identify leaders, mentors, and role models</li> <li>Make sure employees with disabilities know who to go to for internal support, if needed</li> <li>Provide time for natural supports to develop within the organization</li> <li>Develop a peer mentorship program</li> <li>Support ERGs and encourage members to contribute retention ideas</li> </ul>	<ul> <li>DEI is embraced beyond HR specialists and ERG throughout the organization</li> <li>Ensure all new leaders are trained on the Four Pillars</li> <li>Celebrate and share DEI results</li> <li>Show appreciation for ERG efforts</li> <li>Recognize inclusive leaders, managers, and internal champions</li> <li>Participate in local and national events to celebrate inclusion</li> <li>Share lessons learned and successes with others in the business community</li> <li>Review activities annually to support continuous improvement</li> </ul>

## DEMAND-LED CONSIDERATIONS FOR EMPLOYMENT STANDARDS DEVELOPMENT

This phase of background and investigative research also provided our team with insights in terms of how the Four Pillars may be applied within the larger context of standards development. In our interviews with key informants, the general view that was held that some of the recruitment strategies articulated in the Four Pillars could be set out as specific requirements for employers within a set of standards under the *Accessible Canada Act*. These actions, most specifically in the area of adjustments or accommodations within the workplace, could contribute to a more "level playing field" by ensuring that all employers have evidence-based best practices in place.

Informants noted that there should be a degree of flexibility in terms of how that "level playing field" can be best achieved, by focusing on the functional requirement rather than being overly prescriptive. Drawing a correlation with communications or technology standards development, one informant noted that focusing on functional requirements allows industry to have "some creativity about how they meet those functional requirements". Indeed, as the findings have explored, large organizations and SMEs may struggle with different workplace barriers for different reasons (e.g., SMEs requiring HR or legal guidance, or large organizations requiring ways to approach job requirements with greater flexibility), requiring some degree of autonomy on how to best implement such functional requirements within specific workplace contexts.

An appreciation of the variety of employment contexts within the federally regulated private sector also underscores the importance of widespread stakeholder engagement to ensure that employment standards can be implemented effectively. As our informant with expertise in standards development noted, stakeholder involvement was a "very core part of the standards process". This had to go beyond the formal consultation process articulated in various accessibility statutes:

"Make sure that you are already connecting and have foundational relationships with key agencies, partners, stakeholders at a national level at all levels... that would be the biggest lesson."

As findings from this phase of research revealed, it is not only the development of standards that depends on effective and continuous engagement and relationship building, but these are important factors within the implementation of standards as well. As observed in one research study with employers on the Canadian National Standard for Psychological Health and Safety in the Workplace, for effective implementation of standards to occur, employers must be committed to a lengthy process of engagement that required an organizational culture shift to be effective (Kalef et al., 2016).

However, many informants noted that the most significant barriers they observed were at the level of organizational culture. Defined as the shared values, beliefs, and expectations among members of an organization, culture can become expressed in policies and procedures that create barriers for employees with disabilities, such as a company's reliance on ideal job characteristics, rather than on essential job requirements (Kirsh & Gewurtz, 2010). Organization culture also is noted as a contributing factor to the quality of employment for people with disabilities, which also plays a significant role in their mental health and wellbeing (Fielden et al., 2020).

Without broader engagement, awareness, and understanding of how culture contributes barriers to employment for people with disabilities, informants expressed that employment standards, in and of themselves, could not be impactful:

"You can't just plug something on top and then address the biases or the uninformed behaviors or attitudes that are really getting in the way of an accessible place. That workplace where people with disabilities will stay and feel valued and like they have a career path. So, I think that's the risk is that by driving too much towards a compliance framework, we could have very superficial, like every business has a ramp to their work site so that someone with a wheelchair can get in. But they never address the ways that the people in the organization and the culture of the organization might be creating barriers. So, it's much harder to get out in legislation or in standards, I think is how do you create [an] attitudinal barrier-free workplace?"

As demonstrated in the experience of the IWC team and through the findings from key informants, key success factors of recruiting and retaining diverse talent depended to a large degree on the organizational conditions and behaviours that happen prior to engaging in recruitment – i.e., through 'Commitment' and Readiness'. As a demand-driven intervention, BC WiN focuses on employer needs, organizational conditions, and the work environment as significant variables of employment success for people with disabilities. While typical demand-led models take their cues from what jobs employers need filled or what job-related skills are required for in-demand occupations, there is increased attention on demand-side strategies that also include changing the behaviour of employers (Zizys, 2018). In the context of the Four Pillars framework, changing employer behaviours is a significant area of focus in creating more inclusive and accessible workplaces so that employers can access diverse talent.

Findings from this first phase of research activities contribute an understanding of how employers can identify and address barriers in the workplace, as they relate to the recruitment, hiring, and initial retention phases of the employment lifecycle for people with disabilities. They also frame this information within the larger context of demand-led considerations for standards development that include the importance of addressing underlying organizational culture as a key component of the work. By organizing and reflecting on findings within the framework of the Four Pillars to Accessible Employment, the Phase I research activities have consolidated a range of best practices, tools, and approaches to work with employers in subsequent phases of the project.

## LIMITATIONS AND IMPACTS OF COVID-19

A few limitations within this first phase of research must be noted. Although our research team aimed to include more employer perspectives in this first phase of research, only a small sample agreed to participate in key informant interviews and did not feel that they had the authority to speak on behalf of their employer or organization. This may also be attributed in part to the timing of the key informant interviews during the midst of the COVID-19 pandemic which continues to present challenges for employers to balance longer-term diversity, equity, and inclusion priorities with immediate organizational pressures. Of the informants we spoke with, many noted that some employers paused diversity, equity, and inclusion efforts during the height of public health restrictions due to an overall pause in their recruitment plans or a significant scaling back of business. However, since those interviews took place, the project team has already observed shifts in employer engagement with the project, and expression of employer interest in engaging with the IWC team as they resume or expand recruitment in late 2021.

### **NEXT STEPS**

The next research phase will engage with the project's employer Community of Practice to begin testing the accessible employment strategies and approaches identified in Phase I. The project team has engaged with a first cohort of six employer partners, representing a range of sectors, primarily in British Columbia and Ontario, to review and reflect on these findings. As a next step, the team is experimenting with ways to translate the consolidated and expanded Four Pillars into an organizational self-assessment that can be used in collaboration with the Inclusive Workforce Consultant team and individual employer partners. The assessment tool under development will help the employers engaged in this project to gather information that identifies organizational strengths, prioritize areas for change or improvement, and help to identify the specific accessible employment practices that they will implement and test throughout the subsequent phases of the project.

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