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Subject: Submission on behalf of the Canadian Association of Professional Employees' Disability Justice Caucus

The Canadian Association of Professional Employees' Disability Justice Caucus welcomes the Office of the Auditor General's audit examining whether federal organizations are fostering accessible workplaces for public service employees with disabilities. We have heard from countless workers that Departments are not fostering an accessible workplace for public service employees with disabilities.

Accessibility by design

Accessibility cannot be treated as a compliance exercise or an after-the-fact accommodation process. It must be built into the design of the workplace itself. The promise of the Accessible Canada Act was to create a barrier-free Canada by 2040. That goal cannot be achieved if federal workplaces continue to rely on reactive, individualized processes that force disabled employees to fight for basic participation. This means removing barriers wherever possible, rather than accommodating individuals negatively impacted by them.

Accessibility by design means recognizing that barriers exist across physical environments, workplace culture, policies, and legislation. It also means acknowledging the conditions shaping the workforce today. Canada is experiencing a mass disabling event driven in large

part by the ongoing transmission of COVID-19 and other communicable diseases. Disability rates are rising according to data from Statistics Canada, and scientific guidance from the Office of the Chief Science Advisor of Canada has documented the long-term impacts of post-COVID conditions on cognitive, cardiovascular, and functional health. COVID-19 remains a leading cause of death in Canada and contributes to the conditions that drive the two leading causes of mortality, including cardiovascular disease. These realities shape the accessibility needs of the workforce and cannot be ignored in any serious assessment of workplace accessibility.

Occupational Health and Safety Barriers

Accessibility begins with safe workplaces. Occupational health and safety must be understood as a core accessibility issue. The pandemic continues to pose a risk to workers. Indoor air quality, ventilation, and infection prevention are fundamental workplace safety issues. Yet the federal public service has largely failed to implement consistent standards for air quality monitoring, filtration, or transparent reporting of workplace risks. In fact we've been advised that many federal buildings have reverted back to "pre-pandemic" indoor air quality guidelines as they allege the "pandemic is over" despite the evidence to the contrary.

Accessibility barriers in the physical environment also persist in more visible forms. Employees continue to encounter non-functional automatic door openers, inaccessible meeting spaces, and buildings that do not meet basic accessibility expectations. These are not minor inconveniences. They are daily reminders that accessibility remains an afterthought rather than a design principle.

Reports of bedbugs, cockroaches, mice, and other pests in federal buildings continue to raise serious occupational health and safety concerns for workers. Pest infestations create unsanitary conditions, trigger allergic reactions and respiratory issues, and contribute to significant stress and stigma for workers who may inadvertently bring pests home.

A workplace that cannot maintain basic sanitary conditions or accessible physical environments (including indoor air) cannot credibly claim to be providing a safe and accessible environment for its workforce.

Attitudinal Barriers

The largest barriers facing disabled workers are often attitudinal. Too many accessibility policies are built on a presumption of skepticism. Workers are required to repeatedly justify

their needs through documentation, disclosure, and bureaucratic processes that place the burden on the individual rather than on the employer to remove barriers.

The Duty to Accommodate process continues to function as a gatekeeping mechanism rather than a barrier removal framework. Workers are forced to navigate complex administrative processes, disclose personal medical information, and wait months or years for resolution. This approach contradicts the principle of accessibility by design.

Barriers in the workplace are intensified for employees who hold multiple marginalized identities. Disabled workers who are also Indigenous, racialized, gender diverse, immigrants, or caregivers often face overlapping forms of discrimination that compound existing accessibility barriers. These workers are more likely to encounter skepticism about their accommodation needs, greater scrutiny in performance management, and fewer opportunities for mentorship and advancement. Many of these workers report that once they have identified a need for an accommodation, attitudes of their management grow more negative and they begin to experience a psychologically unsafe work environment. The result is that many workers are gradually pushed out of the workplace through sustained structural barriers that make continued employment increasingly difficult. An accessibility framework that does not account for these intersecting realities risks reproducing inequities rather than dismantling them.

Telework illustrates the contradiction clearly. At the beginning of the pandemic, the federal public service demonstrated that large-scale telework was operationally possible and effective. For many workers, telework remains a zero-cost solution that removes workplace barriers entirely. It enables participation for employees with mobility impairments, chronic illness, immune vulnerability, and many other disabilities. There is no credible argument that telework creates undue hardship for the employer when the work was successfully performed remotely for years.

Accessibility cannot depend on an employee's willingness to disclose personal medical information. The workplace must be structured to accommodate diverse needs without requiring workers to fight for basic flexibility.

Legislative Barriers

While the Accessible Canada Act established an important framework, it lacks meaningful enforcement mechanisms. Without clear accountability measures, timelines, and consequences for non-compliance, accessibility commitments risk becoming aspirational statements rather than enforceable rights.

Federal organizations are able to produce accessibility plans and progress reports without demonstrating measurable improvements in the lived experiences of workers. Barriers in hiring, career progression, and workplace participation despite the existence of legislative commitments continue to persist.

Accessibility legislation must include enforceable standards, transparent reporting, and real consequences when departments fail to remove barriers.

One Step Forward, Two Steps Back

There have been some improvements within the federal public service. Accessibility plans, consultations with disability networks, and new policy language signal recognition that change is necessary. However, these steps are often undermined by simultaneous decisions that recreate or reinforce barriers.

The reduction of telework flexibility is a clear example with the introduction of [Direction on Prescribed Presence in the Workplace](#). Before this policy was introduced, telework flexibility strengthened the federal public service by enabling greater diversity and broad workforce participation. This increased accessibility is now being rolled back, forcing disabled workers into accommodation processes that are worse than before to retain arrangements that previously existed as standard practice. Progress cannot be measured solely by the creation of new frameworks while existing accessibility gains are simultaneously removed.

Accessibility progress must be evaluated based on outcomes for workers, not on the number of strategies or plans produced.

Next Steps and Accountability

Accessibility requires structural change. The federal public service must adopt a “yes by default” approach to accessibility measures that remove barriers, including telework and flexible work arrangements. The emphasis on in-person presence must be removed where it serves no operational purpose and creates avoidable barriers.

Departments must establish mentoring programs and leadership development streams specifically designed for disabled employees. Representation will not improve without deliberate investment in career advancement pathways.

Each department should be required to implement measurable hiring and promotion targets for disabled employees and to publicly report progress. Accessibility must also be

integrated into performance expectations for senior leadership, with accountability mechanisms that tie progress to executive evaluation.

Finally, accessibility must be understood as a collective workplace responsibility rather than an individual negotiation. Workers should not have to navigate complex accommodation systems simply to access conditions that allow them to do their jobs.

Accessibility by design means building workplaces where disabled employees can participate fully without having to fight for the right to do so. The federal public service must move beyond statements of intent and commit to concrete, enforceable change.

Sincerely,

A handwritten signature in black ink, appearing to read 'N. Prier', with a stylized flourish at the end.

Nathan Prier, President of CAPE,

On behalf of the Members of the Disability Justice Caucus

About CAPE: With more than 27,000 members, the Canadian Association of Professional Employees (CAPE) is one of the largest federal public service unions in Canada dedicated to advocating on behalf of federal employees in the Economics and Social Science Services (EC) and Translation (TR) groups, as well as employees of the Library of Parliament (LoP), the Office of the Parliamentary Budget Officer (OPBO) and civilian members of the RCMP (ESS and TRL).