



Barrier-Free BCLC:
Multi-Year Accessibility Plan
(2025-2030)

Beginning of Document

This document was developed and written by Untapped Accessibility in partnership with the BC Lottery Corporation (BCLC), its executive, leaders, staff, internal committees, and its Accessibility Employee Resource Group.

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With thanks to the consulting team at [Untapped Accessibility](#).

Accessibility statement

This guide is accessible to PDF/UA standards. If you require an alternative format, contact BCLC to request one: accessibility@bclc.com



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Section One

1.1 ESTABLISHING AND MAINTAINING GOOD RELATIONS WITH INDIGENOUS PEOPLES

Our operations span the entirety of the province we now call British Columbia. We respectfully acknowledge that we are guests in the territories of more than 200 First Nations, each with unique traditions, cultures, and histories. We are grateful to these First Nations caretakers for their stewardship of these lands and waters since time immemorial.

BCLC is committed to restoring good relations with all First Nations, Métis, and Inuit people in British Columbia and beyond. Our journey has only recently begun, and we have a lot of work to do in collaboration with Indigenous Peoples to understand the Truth, reconcile the past, and truly generate win-wins for the greater good, together.



1.2 MESSAGE FROM CEO



I am delighted to present the Barrier-Free BCLC Multi-Year Accessibility Plan (2025-2030). The plan meets our legislative requirements under the Accessible BC Act.

As a social purpose organization, it also demonstrates our commitment to ensuring that our systems, processes, physical environment, services, and policies are created and implemented with accessibility as an integral part of our core business.

BCLC is proud to be part of the communities of British Columbia, one of the most diverse provinces in Canada.

Accessibility for us is about respect and inclusion. BCLC strives to meet the needs of its people and players with visible and invisible disabilities to remove and proactively prevent barriers to accessibility.

Today, close to 25% of British Columbians identify as having a disability. For us, it is an opportunity. We are leveraging it by hiring inclusively, making our procurement processes more accessible for disability-owned business enterprises, and creating accessible tools and technology for all. We do this because it's not only the right thing to do but also to ensure that an inclusive and accessible BCLC will be a place where everyone can contribute and succeed to their full potential.

We embrace the requirements set forth under the Accessible BC Act and the new accessibility standards that will be associated with the legislation.

The Barrier-Free BCLC Multi-Year Accessibility Plan is a shared effort for ensuring a safe, accessible, and inclusive environment for everyone.

I invite you to read our Accessibility Plan and we welcome your feedback as we move closer to our vision of a Barrier-Free BCLC.

A handwritten signature in black ink, appearing to read 'Pat Davis', written in a cursive style.

Pat Davis
PRESIDENT & CEO

1.3 EXECUTIVE SUMMARY

BCLC's Multi-year Accessibility Plan gathers into one document our vision of a barrier-free organization for our people, partners, and the communities we serve.

While BCLC has been taking action to create a more disability inclusive workplace for several years, developing this plan gave us an opportunity to check in with our people about where accessibility barriers persist. We heard that our people have a lot of energy and commitment to contribute to improving accessibility even further. However, we also heard we have more work to do.

The plan details our work to date and our intended next steps. It also includes feedback from our employees about barriers and opportunities they see. The plan launches alongside a new feedback mechanism the public can use to tell us what further barriers we need to address.

Perhaps most importantly, the accessibility plan provides everyone at BCLC a common understanding of how we plan to move forward and create a barrier-free BCLC.

We've developed an action plan to remove barriers that have been identified while preventing new ones. The work will occur in five priority areas:

- Culture Change
- Communications and Technology
- Employment
- Physical Environment
- Procurement

We acknowledge that accessibility is a journey, and creating the culture change we want will take time and persistence. The Accessibility Plan will continue to evolve as we progress toward our accessibility goals and with the release of future accessibility standards/requirements.

We would like to thank the Accessibility Project Working Group for their contributions. We are grateful to the entire BCLC team for their enthusiasm and willingness to come on this transformative journey.

1.4 PURPOSE OF THE ORGANIZATION

Social purpose

BCLC is a social purpose company: “We exist to generate win-wins for the greater good.” When a player plays one of our games, regardless of the outcome, there is a “win”: the player receives a great experience at the casino, at a lottery retailer or while playing online, and revenues contribute to provincial programs and community services.

We seek to make every decision with the intention of positively contributing to the progress of our society. We are continuing to embed this social purpose in our company, including into the employee and player experience and other aspects of our operations.

We consider how we might create additional value for players, employees, business partners, suppliers, communities, Indigenous Peoples, and municipal and provincial governments. BCLC is focused on delivering on our strategic priorities, including those established by Government in our Mandate Letter. Government’s instructions form part of our strategic context and, along with economic and market trends, inform the business choices we make.



Vision

It is the vision of BCLC to revolutionize gambling entertainment through engaging experiences that build and benefit communities.

Values

Integrity

The games we offer and the ways we conduct business are fair, honest, transparent, and trustworthy.

Community

We create a positive impact for people and the planet.

Respect

We treat all people with dignity and value diverse perspectives.



1.5 OUR DIVERSITY, INCLUSION, AND BELONGING JOURNEY SO FAR

In 2016, BCLC started its diversity, inclusion, and belonging journey. A Diversity, Inclusion, and Belonging Committee was formed with a cross-section of people from across the organization. In March 2017, a strategy and roadmap were delivered to the Executive team and then to the Board of Directors. It was approved as one of the top priorities for the organization.

Since then, BCLC has never looked back. Diversity and inclusion are top drivers for our people across the organization.

BCLC's Diversity, Inclusion, and Belonging strategy is strongly rooted in our core corporate values of respect, integrity, and community.

For us, diversity refers to the rich set of traits, abilities, backgrounds, and ideas that everyone brings to work with them each day.

Inclusion is about building a community, where we practice respect for one another, creating safe spaces where everyone's abilities can be fully recognized and valued, and their uniqueness celebrated.

Belonging for us is fostering an environment where people feel part of the fabric of the workplace, are encouraged to bring their unassimilated, authentic selves to work, and are respected for who they are.

On these foundations, we have built several policies, initiatives, and learning opportunities.

Since 2022, BCLC has been recognized with three national and one international award for its diversity and inclusion work.

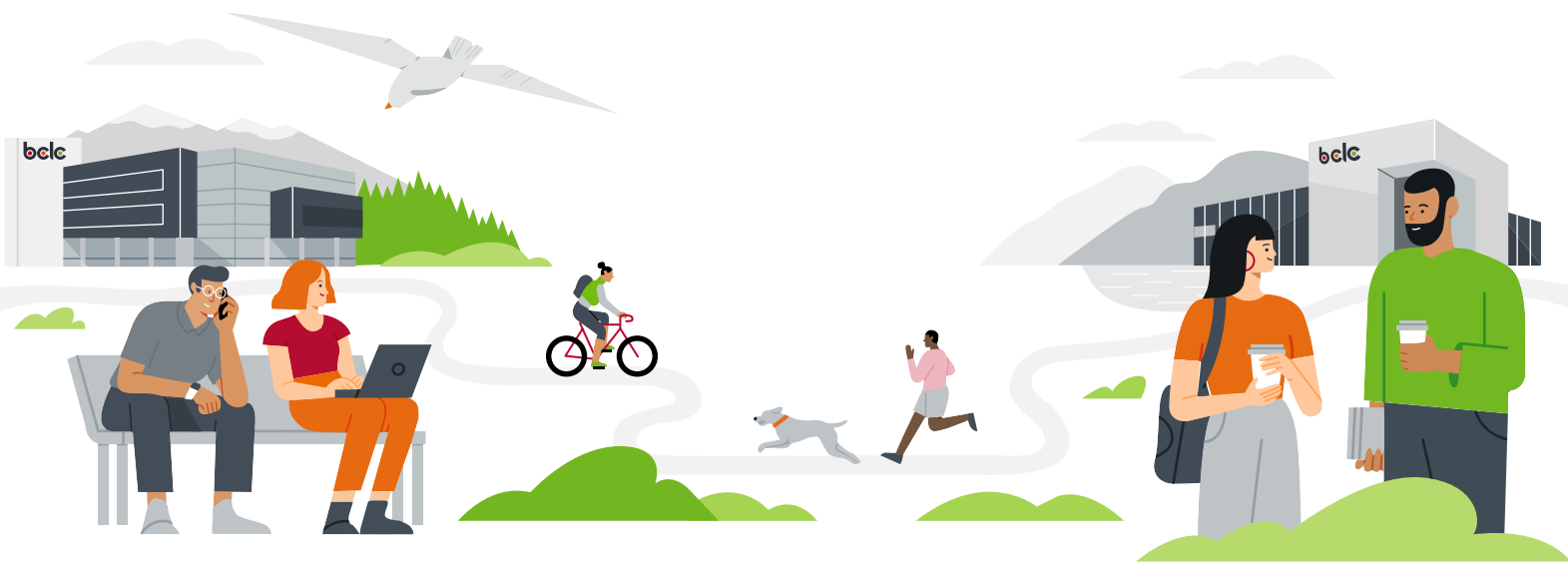
1. 2022 Leading Diversity and Inclusion Employer by HR Reporter Canada
2. 2022 EGR North America Diversity and Inclusion Model Organization
3. 2022 Five-Star Diversity and Inclusion Employers by HRDC, Canada
4. 2023 Five-Star Diversity and Inclusion Employers by HRDC, Canada.

We have also established ourselves as a community leader in promoting diversity and inclusion. In 2021, we established a Crowns Accessibility Diversity and Inclusion Dialogue Network to share best practices. In 2022, we organized and hosted a first-of-its-kind provincial accessibility, diversity, and inclusion conference at BCLC with over 140 representatives from across all the Crown corporations.

In 2023, we revised all our policies with a diversity, inclusion, and belonging lens to ensure gender neutral language that reflects equity, fairness, and inclusion.

In the same year, BCLC became the first Crown corporation in the province to introduce and implement an inclusive holiday program where our people can substitute any of the statutory holidays for a day of their own personal or cultural significance, except for National Truth and Reconciliation Day.

Our diversity, inclusion and belonging journey demonstrates our efforts to foster inclusion and empowerment in partnership with our people.



1.6 STRATEGIC APPROACH

Existing BCLC policies

Accessibility and accommodation are some of the guiding principles of our Diversity, Inclusion, and Belonging policy and operational practices.

Respect for Dignity

Accommodations are provided with respect for the individuals' right to privacy, autonomy, and dignity. Accommodations promote inclusion by allowing individuals to fully carry out their job duties and participate in all their work-related activities.

Individualization

Accommodations are individualized to meet the unique circumstances or needs of the individual. Accommodation processes account for meaningful participation of the individual, working cooperatively with all partners in the accommodation process.

Accommodations are creative solutions to enhance full participation in employment and could include—but are not limited to—changes made to rules, standards, policies, and physical environments.



1.7 ALIGNMENT WITH BCLC'S DIVERSITY, INCLUSION AND BELONGING STRATEGY

Strategic Vision

We are a diverse and inclusive organization that is accessible by default where everyone feels they belong.

Accessibility is an integral part of our Diversity, Inclusion, and Belonging policy, strategy, and practices.

The four Diversity, Inclusion, and Belonging strategic pillars: inclusive culture and leadership, employee experience, bias free systems and processes, community engagement and influence are aligned to support our Social Purpose and antiracism vision.



1.8 OPERATING ENVIRONMENT

Accessibility plan framework

BCLC has identified five key areas within the organization that represent the best opportunities to have an impact on accessibility.

These are areas where people with disabilities commonly experience barriers in everyday life, when trying to do simple things like buying a lottery ticket, celebrating a special event with family, or applying for a new job.

These areas provide a useful frame for naming and organizing the plan to remove and prevent barriers.

Culture Change

The inaccessibility people with disabilities face today is the result of decades of decisions that didn't consider their needs.

It is going to take time and a commitment to defining our culture to become an organization which actively prevents and removes barriers.

We aspire to become an organization that thinks and designs in a way that embraces the diversity of human experience.

We would like to be an organization of accessibility champions and change advocates, a team of people who ask early and often about how to remove barriers and increase accessibility.

Communications and Technology

Increasingly, we see that technology presents new ways to bring us together. But if we aren't thinking about accessibility in the design of technology, people with disabilities can be left out. Websites might not work for people with colour blindness or low vision. Customer support service centres might not be useable for people with hearing loss or Deafness. Instructions might be too small or too complicated to follow for someone with a cognitive disability.

People with disabilities deserve barrier-free access to the thrill of checking the latest winning numbers. They deserve to reach out for support from GameSense in a method that works best for them. They deserve to see advertisements showing people that look like them enjoying a fun night out with friends.

With recent data from Statistics Canada showing that [more than 27% of Canadians have at least one disability](#), there are many opportunities to make technology and communications more inclusive for the growing number of disabled people in our communities.

Employment

BCLC employs over 1200 purpose-driven, talented people. As a Top 50 employer in BC for 16 years in a row, we have an opportunity to be an employer of choice for top talent, whether they have a disability or not.

As an employer, it's our goal to create an environment free of discrimination and open to diverse perspectives, where all people feel they are seen, heard and belong. As a Crown corporation, we must reflect the commitments our Province has made and contribute to building a society where all have equal opportunities and are treated fairly.

And yet, accessibility barriers get in the way for talented people with disabilities from contributing to the workforce. Stigma and stereotypes can prevent disabled candidates with apparent disabilities from making it to the shortlist. Application processes and aptitude testing can prevent people with non-apparent disabilities like anxiety or neurodivergence from shining, even if they can do the job. And work sites missing accessible washrooms or automatic door buttons might limit people with mobility devices from accessing their new office.

When people with disabilities do literally and physically make it through the door, they still may experience barriers to equal opportunity in the workplace. Unexamined bias on the part of leaders may prevent them from getting promoted. Professional development and training programs may not consider their needs. Ableist work cultures that value overworking may force them to choose between leaving or burning out.

Physical Environment

When we think about accessibility, physical barriers may be some of the most familiar. For example, a neighbourhood shop with a stairs-only entrance or a favourite restaurant with no accessible washroom. To some extent, we think of physical barriers as ones that impact people with mobility related disabilities. This is just part of the story.

The physical environment can present barriers for people with less apparent types of disabilities too. For example, a worker with allergies may struggle at work when there isn't a scent-reduction policy. A player with a vision related disability might not be able to use the elevator at the casino due to a lack of braille signage.

Making the physical environment more accessible will take investing in accessibility early in the design processes as it is always more cost effective than retrofitting for accessibility.

Procurement

Procurement, or the way our organization buys services and goods, plays a powerful role in creating a more accessible organization. When procurement decisions factor in accessibility, we have a chance to improve accessibility for employees, players, and our broader communities.

When the procurement process values accessibility, it can result in more useful software that works for everyone including people with disabilities, or it can ensure that renovation projects will offer better features to support a workplace that works for everyone.

When procurement processes ask suppliers for information about the accessibility of their products or services, it signals to a wide range of businesses that accessibility is important. And when procurement processes consider people with disabilities as part of the spectrum of diversity we wish to see in our supplier community, the result can be improved employment for people with disabilities and more opportunity for disabled entrepreneurs.

As BCLC continues the work of identifying, removing, and preventing barriers, we welcome feedback about barriers in five key areas.

Legislative requirements for BCLC

The Accessible BC Act

As a Prescribed Organization, BCLC is required to comply with the [Accessible BC Act](#).

The three requirements of the Act are:

1. Create and maintain an accessibility plan that outlines barriers and how BCLC will remove them. This plan must be reviewed and updated at least once every three years.
2. Establish an Accessibility Committee that will assist with the review of the accessibility plan and assist in the identification and removal barriers.

This committee must:

- i. Have at least half its members be persons with lived experience of disability, or who support or are from organizations that support people with disabilities, and reflect the diversity of persons with disabilities in British Columbia,
 - ii. Have at least one member who identifies as Indigenous, and
 - iii. Reflect the diversity of BC's population.
3. Establish a feedback process to allow member of the public to comment or add suggestions that will potentially be used in future reviews and updates of the accessibility plan.



Principles

The Accessible BC Act highlights these principles as elements that must be considered throughout any decision-making regarding the establishment of an accessibility plan. The principles are:

Inclusion

All British Columbians, including persons with disabilities, should be able to participate fully and equally in their communities.

Adaptability

Accessibility plans should reflect that disability and accessibility are evolving concepts that change as services, technology, and attitudes change.

Diversity

Accessibility plans should acknowledge the principles of intersectionality and diversity within the disability community.

Collaboration

Promoting accessible communities is a shared responsibility and everyone has a role to play. When communities work together, everyone learns and improves together.

Self-determination

Accessibility plans should seek to empower people with disabilities to make their own choices and pursue the lives they wish to live.

Universal design

An accessibility plan should be designed to meet the needs of all people.

Coming accessibility standards

The Accessible BC Act states that there will be detailed standards that will further support inclusion of people with disabilities. Eight standard areas are mentioned in

the Act. These standards will outline future requirements to ensure accessibility in the following areas:

- Employment
- Delivery of services
- The built environment
- Information and Communications
- Transportation
- Health
- Education
- Procurement

When brought into force, the standards will guide organizations on how to tackle systemic barriers in areas where accessibility barriers prevent equal and full participation.

The above have traditionally represented those areas where people with disabilities have often experienced barriers that have limited their access to society on an equal footing with their peers.

Other important legislation

Below are other legislative components affecting Canada, and its provinces that include:

The [UN Convention on the Rights of Persons with Disabilities](#) gives us an international framework that guides countries to become accessible for citizens with disabilities.

The [Canadian Charter of Rights and Freedoms](#), [Accessible Canada Act](#), and [BC Human Rights Code](#) provide frameworks and guidance to steer Canadian institutions and society toward an environment that is inclusive and free from discrimination.

Section Two

2.1 HIGHLIGHTS OF OUR ACCESSIBILITY JOURNEY SO FAR

Rick Hansen Foundation certified office spaces

BCLC successfully pursued its [Rick Hansen Foundation Accessibility Certification](#) (RHFAC) for both the Kamloops and Vancouver offices. The RHFAC is a rating system to evaluate the meaningful access of commercial, institutional, and multi-unit residential buildings and sites. BCLC was one of the first members of the Presidents Group to receive this certification.

Presidents Group membership

BCLC's Chief Executive Officer is an appointed member of the Presidents Group, which is a leadership table of twenty-five business leaders recognized for their commitment to hiring people with disabilities. Each leader commits to championing inclusion and accessibility through policy recommendations and measuring disability inclusion in the workplace.

Participating in the Presidents Group is an extension of our continuous commitment to furthering our knowledge of fostering diversity, inclusion, and belonging at BCLC. Joining a network of like-minded employers also committed to this movement is another important step on our path together towards an accessible future for all.

Participation in the Pledge to Measure

By joining the Pledge to Measure, we have committed to surveying our staff on an annual basis and publicly reporting the number of employees and leaders who self-identify as having a disability. We have been part of the Pledge to Measure for four years and will be reporting again in June 2024.

Employee Engagement Survey

For the first time in our Employee Engagement Survey, we included two questions specifically focused on accessibility issues.

With 74.1% response rate to the Engagement Survey, 68% of the employees responded favourably feeling that BCLC has provided support to address or reduce workplace accessibility issues. 71% of the employees responded favourably feeling that colleagues' actions reflect behaviours that remove bias towards accessibility and disability issues.

Digital audit

In early 2024, BCLC conducted a digital audit including an in-depth review of key pages over five BC Lottery Corporation websites including:

- [BCLC.com](https://www.bclc.com)
- BCLC Corporate
- BCLC Careers
- PlayNow
- GameSense

The digital audit also included the "BCLC Lotto!" mobile app.

Conducting a digital audit provided important information about accessibility barriers that may prevent an equitable and meaningful digital experience for everyone. The audit looked at accessibility for site visitors using assistive technology for people with visual, physical, hearing, cognitive, or learning disabilities.

More than 120 pages were included in the audit.

The audit found many significant issues with BCLC websites and app. This is not surprising, as most websites have accessibility issues if they were not designed with accessibility as a prime consideration.

The auditors provided recommendations to improve accessibility in the future. The recommendations included:

- Training for BCLC's inhouse web development team to provide them with an understanding of accessibility standards.
- Assigning a project team member on each product to function as the accessibility champion, with the responsibility to ensure that accessibility is included in the project scope and testing process.
- Planning to implement accessibility in all future website or app builds. Remediating the existing websites would be very labour-intensive. BCLC should instead look at scoping in accessibility as digital sites come up for renewal.

Accessibility awareness training

In late 2023 and into 2024, BCLC staff were provided with accessibility awareness training in the five key areas of priority outlined in the BCLC Multiyear Accessibility Plan. This included an introduction to the Accessible BC Act, key terms and definitions, as well as custom content in the following areas:

- People and Culture
- IT
- Procurement
- Facilities
- Accessible Leadership

The goal of these awareness building sessions was to help establish a common understanding and language for the accessibility work to come.

With the support of the Accessibility Employee Resource Group, the Diversity, Inclusion, and Belonging Committee has hosted accessibility focused events on important topics such as allyship, inclusive leadership, and safe disclosure in the workplace.

People leaders are also offered learning opportunities on inclusive leadership and conscious allyship, to promote a culture of inclusion by understanding privilege and systemic inequalities.

Benefits Plan for our people

We have a comprehensive flexible benefits plan. It strives to be accessible to all people including those living with disabilities.

Most recently, BCLC improved access to mental health professional coverage by increasing the annual maximums as well as expanding the list of eligible professionals to include an extensive list of mental health professionals accredited in BC to provide mental health services.

BCLC understands that keeping a plan inclusive means that it must always be reviewed for improvements. Therefore, BCLC regularly conducts reviews with an external consultant to ensure we are leaders in the space providing benefits that are relevant, inclusive and positively impactful for our employees and their covered dependents. BCLC also welcomes feedback and ideas from employees to enhance the benefits plan and will often adjust or add benefit options based on requests made by the Advisory Committee of Employees and/or through doing periodic surveys with employees on their satisfaction with the plan.

Our vision of a Barrier-Free BCLC

We want to be a diverse and inclusive organization that is accessible by default where everyone feels they belong.

BCLC is committed to improving opportunities for people with disabilities. A barrier-free BCLC would mean that people with disabilities experience our organization on an equal basis with non-disabled people.

A barrier-free BCLC would provide employees, players, and members of our broader community with equal access and equal outcomes. BCLC envisions an inclusive environment where individuals with disabilities can thrive, work, and enjoy themselves while receiving dignified and respectful treatment.

Embracing a social model of disability

The social model of disability guides us on our accessibility journey. The social model of disability invites us to think about what organizations can do to remove the barriers to access that prevent equal and full participation for people with disabilities.

Many of us are used to thinking about disability in a medical model. The medical model considered disability to be the responsibility of the individual; a problem that needed to be cured or rehabilitated. In comparison, the social model suggests that it is not the person with a disability who must change, but society itself. Society must shift attitudes, policies, and environments to make it a priority that everyone can experience a barrier-free society.

As BCLC builds an accessible organization, we will use the social model, as well as the principles in the Accessible BC Act, to guide us in our approach.

We will recognize that people with experience of disabilities must be involved in developing the pathway to a barrier-free BCLC. Recognizing that disabled people are best positioned to identify solutions, we will encourage each other to ask early and often, “Have we consulted people with disabilities in this process”?

2.2 OUR COMMITTEES

BCLC Accessibility Employee Resource Group functions as the Accessibility Committee

The Accessibility Employee Resource Group was established in early 2022. The group works to strengthen BCLC’s inclusive culture and sense of belonging for people with disabilities. The group provides advice to BCLC on how to develop barrier-free processes and identify areas for improvement. More than half of the group’s membership is comprised of individuals who have lived experience of disability or of supporting family members with disabilities.

The Accessibility Employee Resource Group functions as the accessibility committee, advising the Diversity, Inclusion, and Belonging team on the work to remove barriers.

The group has been instrumental in assisting with the development of the BCLC Barrier-Free Multiyear Accessibility Plan. In December 2023, under the strategic direction of Diversity, Inclusion and Belonging and the Change Management partner, the group participated in a barrier identification exercise, and it will continue to provide feedback on accessibility barriers and potential solutions.

Accessibility Project Working Group

The Accessibility Project Working Group includes representatives from each priority area of the accessibility plan. As leaders with responsibility for budgeting and resourcing projects, they play a crucial role in setting realistic commitments to addressing barriers. The Accessibility Project Working Group members are responsible for advising on the development of action plans that will advance accessibility in their department and have played a key role in developing this accessibility plan.

Diversity, Inclusion, and Belonging Committee

The Diversity, Inclusion, and Belonging Committee was established in 2016. The Committee consists of a diverse group of people who champion diversity, inclusion, and belonging in the organization. They provide insights and advice on a range of equity issues, enabling BCLC to deliver better solutions for our employees, customers, and communities.

The Diversity, Inclusion, and Belonging Committee recognizes accessibility as an important facet of diversity. In December 2023, the Diversity, Inclusion, and Belonging Committee joined the Accessibility Employee Resource Group in a barrier identification exercise, which has informed this plan.

Other Employee Resource Groups involved in this work

Indigenous and Allies

The Indigenous and Allies Employee Resource Group (IAERG) was created for Indigenous and allies to affect change at the organizational and individual level by providing a mechanism to flow guidance upwards. We look to advance knowledge

of Indigenous Peoples (First Nations, Métis, and Inuit) in British Columbia and Canada, create awareness of successes and challenges, and decolonize BCLC operations.

In December 2023, the group joined the Accessibility Employee Resource Group in a barrier identification exercise, which has informed this plan.

2.3 BARRIERS AT BCLC

What we learned - interviews with leaders

In early 2024, Accessibility Project Working Group members met with the Untapped Accessibility consulting team in one-on-one interviews. In these interviews, leaders shared accessibility work to date, as well as any identified next steps to address barriers.

Additional interviews were held with leaders in areas such as customer service and communications. The consulting team also circled back to the Accessibility Employee Resource Group members for a further conversation about barriers and opportunities.

The following section highlights opportunities gathered from the interviews:

- Offering education and development are crucial components to an inclusive culture. We heard that BCLC would benefit from training and education about accessible recruitment, developing mentorship programs, and building the capacity of staff to recognize and take steps to remove barriers in the work environment.
- Aiming for better representation of people with disabilities in senior roles would go far in improving awareness of accessibility.
- Conducting accessibility audits on key processes such as recruitment and onboarding for new staff would help make accessibility a normal part of the organization's culture.

- Taking appropriate measures for website accessibility at the enterprise level and adopting accessible social media practices would improve communication for people with disabilities.
- BCLC has been leveraging technologies to remove barriers for people with disabilities and needs to seek more opportunities to build on this work. Digital solutions need to be balanced with an awareness that not all people have a high level of digital literacy, and they may need more support.
- Our social purpose aligns well with accessibility. Social procurement can improve representation of disabled suppliers and increase opportunities for organizations that provide employment for people with disabilities.

What we heard - barriers within BCLC

Barrier identification exercise with Accessibility Employee Resource Group

In late 2023, BCLC hosted a barrier identification exercise with the Accessibility Employee Resource Group. Members of the Diversity, Inclusion, and Belonging Committee and the Indigenous and Allies Employee Resource Group also joined the session.

Attendees in this session were asked to identify barriers that either they have experienced or noticed in their workflows. Some participants also shared barriers reported by their teams.

Below is the list of barriers shared during the session.

Access to the data centre

The data centre is not physically accessible due to its location.

Customer service expectations and environments

Customer service expectations and the work environment create physical and attitudinal barriers.

High workloads and an expectation for multitasking can create barriers. The cognitive load placed on customer service team members can overwhelm staff,

including those who are neurodivergent. The rate at which text-based chats and phone calls occur adds to this load.

The perceived expectations that people could take on high workloads was seen as a potential attitudinal and physical barrier.

Sick days

Stigma around mental health represents attitudinal barriers for some people. BCLC recently updated the Sick Days section under the Terms and Conditions of Employment Policy to include physical or mental illness, injury or disorder.

Screening for “fit” in recruitment

The term “fit”, which can be used to describe an appropriate match for a team, can also be considered vague, and it can uphold systemic biases that limit the opportunities for candidates.

Virtual meetings and captioning

Virtual meetings and captioning represented technological information communication barriers for attendees at barrier identification sessions.

Captioning for virtual meetings is not offered unless specifically requested.

It was noted that having captions switched on by default in virtual meetings would be beneficial to everyone as they can choose whether to use them or not.

Meetings and events

Meetings or events, either virtual or in-person, can represent attitudinal and communication barriers for some people if accessibility is not part of the planning process.

Sharing event information in advance is not a standard practice for meetings. Event information, such as agendas, slides and even group discussion questions could be shared in advance. This would allow attendees who process information at different speeds to have equal opportunities to participate.

Sensory challenges in office spaces

BCLC office spaces present some barriers for some people with sensory-related disabilities. These barriers can be considered both policy and attitudinal.

Open-concept offices can contribute to a distracting work environment due to noise. Additionally, the space itself is not customizable to a person's sensory requirements.

Fire alarms

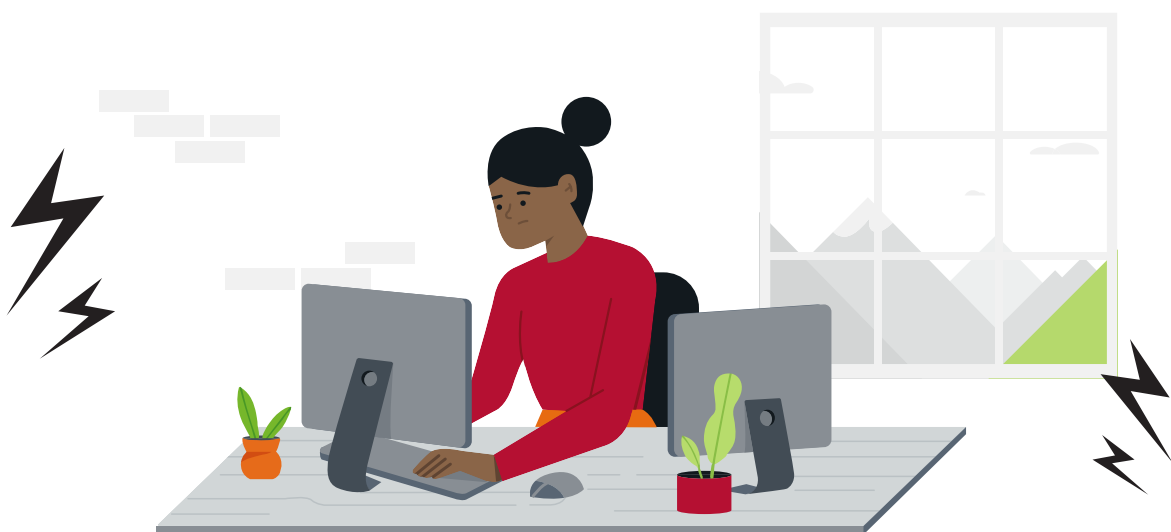
Inaccessible fire alarms represented physical information communication and policy barriers to attendees at the barrier identification session.

It was noted that fire alarms that rely on sound only, without any visual cues could pose a danger to people who are Deaf or hard of hearing.

Culture shift

Some of the discussion focused on the barriers present in trying to establish a culture shift.

Creating spaces for change is a difficult undertaking because it requires the entire organization to set an example for others.



Further Barriers identified via the Accessibility Employee Resource Group

In Spring 2024, The Accessibility Employee Resource Group shared a further list of barriers they have identified. The barriers are categorized by barrier type.

Attitudinal barriers

Low awareness of non-apparent disabilities

Low awareness of non-apparent disabilities, including the impact of such conditions creates attitudinal barriers for some people with disabilities. When managers and supervisors don't understand these kinds of disabilities, they may also be unprepared to support team members with less visible disabilities.

Assumption that everyone is neurotypical

Within the culture at BCLC, there are unexamined assumptions that everyone is neurotypical. This includes a low awareness of neurodivergent people and how they show up in a workplace. When an organization defaults to assuming that everyone thinks the same way, it can result in misunderstandings. For example, neurodivergent people may ask clarifying questions with a genuine desire to understand, but neurotypical people may interpret these questions as criticism or challenges to authority.

Expectations around "professional" dress

Assumptions or value placed on professional attire put some people at a disadvantage. For example, people with sensory related disabilities who find formal clothing uncomfortable and therefore distracting, may feel negative impacts on their focus and performance.

Employee rewards don't fit all bodies

Recognition gifts like branded t-shirts are not available in a range of sizes to fit larger bodies.

Onus is on people with disabilities to adapt their communication style

When the organizational culture defaults to expecting that everyone is neurotypical, the responsibility to modify communication styles and tactics is left with the people already managing a disability. This is a double burden.

Physical barriers

Casino environments

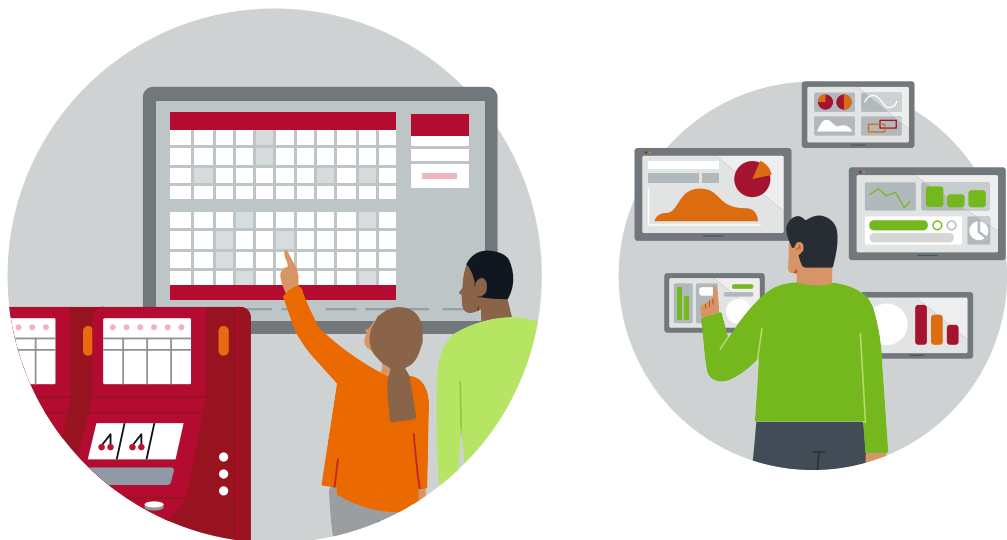
Game floors can be congested, with narrow aisles between slot banks. When someone does not tuck their chair in, it blocks the aisle. This impacts accessibility for all players.

Additionally, casino environments are designed in a way that is very challenging for people with sensory-related disabilities. Casinos offer no space to retreat to when a person feels overstimulated. A low sensory room with lower lighting and a door to shut could be helpful.

Technology barriers

Reliance on colour coding

Some technology tools at BCLC rely on a colour coding system for system alerts, which creates barriers for people with colour blindness or other vision related disabilities.



Section Three

OUR FIVE-YEAR PLAN

The implementation of accessibility requires a review of systems, physical spaces, policies, how people find work, how people play and how services are used.

BCLC will take a holistic approach to the implementation of accessibility by looking at how each of these elements work together to build an accessible environment. A key aspect of this is the emphasis on culture change. An organization can be accessible, but if the mindsets and behaviours of the organization remain the same, then the accessibility of the organization will fall short of its full potential.

In the next five years, BCLC plans to build accessibility into its internal and external operations. The following sections describe accessibility work to date, as well as future actions.

Near term actions are scheduled to be done between 2025 and 2027. Long term actions will be completed between 2028 and 2030.

Culture Change

We make it our everyday practice to embrace diversity and inclusion as our values-in-action. Our leaders and our people demonstrate a genuine commitment to disability inclusion by communicating it clearly throughout the organization. We also ensure that we establish inclusive policies and practices and offer continuous education and awareness opportunities.

Every day, BCLC embraces and practices a culture of respect, inclusion, and opportunities irrespective of any kind of differences including but not limited to, backgrounds, abilities, education, or experiences. We will strive to become an organization where everyone understands accessibility and why it matters- where everyone has the resources to make our services, products, and technologies more accessible and inclusive.

Near term actions

- Build awareness of accessibility through storytelling and celebration.
- Develop tools and training to focus on developing inclusive and accessible environments and incorporate them into the existing learning and development programs offered internally in the organization.
- BCLC would apply the inclusive and accessibility principles and subsequently ensure that program content and learning environments are inclusive and accessible regardless of whether we are delivering internally or bringing in external learning providers.
- To reduce the stigma regarding disability and to improve reporting on the state of persons with disabilities at BCLC, we will promote self-identification via the annual Portlet survey.
- Train individuals to be accessibility champions and change advocates; build awareness, reduce stigma for everyone.
- Share and learn from other Crown Agencies by starting an Accessibility Working Group within the Crowns' Accessibility, Diversity and Inclusion Dialogue Network.

Long term actions

- Create an accessibility hub on the Hive (BCLC's intranet), hosted by the Accessibility Employee Resource Group. The accessibility hub will serve as a resource for guidance, tools, tips, and best practices. It will also be linked to the Diversity, Inclusion, and Belonging pages on the Hive as well as to our wellness resources.
- Create an Accessibility Leadership Committee with representation from all divisions across the organization. Their role will be to track progress on Barrier-Free BCLC Multi-Year Accessibility Plan by creating accountability.

Communications and Technology

Communications

Accessible and inclusive communication for us means ensuring that messaging and information meets the communication needs of everyone. Whether employees or our customers, they can access, understand and engage with the information we are sharing.

Work to date

BCLC continues to raise awareness of accessibility by building relationships with disability-focused initiatives like Accessible Employers (formerly Presidents Group).

We have updated content on our career pages incorporating accessibility.

Initiated training for the communications team on accessible content writing for websites and social media. The communications team has started to use tools to evaluate external corporate messaging to ensure that the messages meet accessibility ratings.

We have added alternative captions for screen readers for more accessible social media content.

Internally, at each all-staff town hall, employees are reminded of the live captioning feature on Microsoft Teams.

Near term actions

- Develop an internal and external communications plan to support awareness of the accessibility plan and BCLC's actions.
- Improve accessibility of social media to improve access for many players. The work to identify these better practices is already underway.
- Audit internal websites including the Hive (intranet) to assess accessibility.

Long term actions

- Review our protocols to ensure we are taking the appropriate measures for posting information on social media and producing accessible website content.
- Incorporate user testing, including people with lived experience of disability, when conducting research into assistive technology and digital platforms that are used by BCLC.
- Collaborate with Technology teams to develop communications to raise awareness about existing accessibility options with inhouse products and services.

Technology

We desire to ensure everyone can perceive, understand, engage, navigate, and interact with technology regardless of device, software, or product without barriers.

Work to date

Upon completion of the digital accessibility audit in early 2024, BCLC's web team received accessibility training to help build the team's understanding of the common issues in web design.

As mentioned earlier, Digital Audit of some of our key websites was also completed in February 2024 including the partial audit of BCLC Lotto app.

Digital Properties Accessibility Strategic Goals

To the extent where reasonably practicable, BCLC will implement the following measures to ensure that BCLC digital properties conform to WCAG (Web Content Accessibility Guidelines) 2.0, Level AA.

Near term actions

- Conduct a thorough accessibility audit of the BCLC digital properties to identify areas of non-compliance with WCAG 2.0 AA standards. Compile a detailed report outlining the findings of the audit, prioritizing accessibility issues based on severity and impact on user experience.
- Provide training sessions for web development and design teams to enhance their understanding of accessibility best practices and WCAG 2.0 AA guidelines.
- Develop a comprehensive plan to tackle accessibility issues on BCLC digital properties.
- Iteration and updates on BCLC digital properties' content and features to maintain direction toward WCAG 2.0 AA compliance as new content is added or modified. Based on a list of practical deliverables.
- Expand accessibility training to encompass all departments involved in content development, content creation, and maintenance where feasible.
- Engage proactively with users with disabilities through focus groups, surveys, and ongoing user testing to gather feedback and prioritize enhancements, ensuring inclusivity.

Long term actions

- Continue iteration and updates on BCLC digital properties' content and features to maintain direction toward WCAG 2.0 AA compliance as new content is added or modified. Based on a list of practical deliverables.
- Implement automated testing tools to streamline the identification and remediation of accessibility issues, increasing efficiency in maintaining compliance.
- Work to achieve and maintain future iterations of WCAG compliance across various aspects of BCLC digital properties where feasible.

Employment

As an accessible employer, we strive to remove barriers within our workspaces, employment practices and workplace culture, and are inclusive and accommodating of all employees and candidates with disabilities.

Work to date

Since 2020, we have created a Working Remotely Policy. While the policy offers opportunities for some flexibility, it is dependent on the nature of job duties. This program provides flexibility that works for people with disabilities, as well as those with caregiving and other family responsibilities.

BCLC has a process that supports people to request adjustments to their desks and office environments and includes ways to make sure that workspaces can be reasonably adapted.

BCLC has built flexible schedules for employees to support accommodations and improve overall accessibility.

Near term actions

- Consider intersectional barriers when providing professional development opportunities.
- Consider intersectional barriers for business travel across the board as a result of our expense policy. For example, these might emerge when employees must pay for travel related expenses out of pocket before receiving reimbursement.

Long term actions

- Explore the concept of “job carving,” which is when adjustments are made to the role responsibilities to best fit the abilities of the employee.

Recruitment process

For this plan, recruitment includes factors such as applying and interviewing for a job.

Work to date

BCLC has recently adjusted job descriptions to ensure job requirements only include the essential functions, and don't include items that can be described as "nice to haves." This includes non-essentials like requiring a driver's license when the role doesn't involve driving. By removing non-essentials, we can reduce unintended barriers for candidates who may otherwise be able to do the job.

We encourage individuals to apply even if they don't have 100% of the listed qualifications. We also proactively invite applicants to request accommodations at the interview stage.

Near term actions

- Starting the process of sharing interview questions with candidates ahead of time.
- To create a more inclusive hiring process, we will ensure that our hiring panels are diverse.

Long term actions

- Seek more ways to support candidates to understand the kinds of accommodations that can be provided in the application and interview process.
- Work with a consultant to review the candidate application process to identify barriers to accessibility within the experience.

Physical environment

We strive to create an accessible environment which allows for freedom of movement and use in total safety, regardless of age, gender, or impairments, of a space which can be used by all, with no obstacles, with dignity and the highest possible levels of independence.

Work to date

The physical environment, also referred to as the built environment, is a key component in building accessibility. For BCLC, the physical environment includes the offices in Kamloops and Vancouver.

Under the direction of the facilities department, BCLC continues to undergo renovations to its two main facilities which will remove barriers and improve accessibility.

This builds on learnings from Rick Hansen Foundation accessibility audits to both office spaces, which were conducted in 2020 and recommendations provided by B.C. architecture firm Kuno.

We increased the number of parking stalls and where possible implemented vertical signage to support wayfinding.

Elevators have been upgraded to comply with CSA guidelines, and now provide audio announcements and braille.

We continue to update emergency wayfinding to match universal signage throughout buildings.

Near term actions

- Develop a review schedule for internal facilities that will consider paths of travel, entrances and exits, and safety features.
- Add visual emergency alarms to private and public spaces.

Long term actions

- Review provincial building standards to ensure that when updating fire panels and annunciators in buildings, strobe lights and visual alarms are included, and that pull stations are mounted at the appropriate level.
- Develop building directories for both office buildings to help locate specific departments, meetings, and events.
- Improve the colour contrast of the flooring in the cafeteria of both the buildings.
- Renew our Rick Hansen Foundation certifications on both office spaces and share scorecards with the organization.

Procurement

To contribute to BCLC's social purpose and accessibility objectives, we seek ways to ensure the goods and services purchased are accessible by design, where possible. By doing so, we will ensure that people with disabilities can use them without barriers.

Work to date

As a social purpose organization, BCLC has taken actions to consider supplier diversity and social value in procurement processes, but to date there have been no targeted initiatives that address disability on its own.

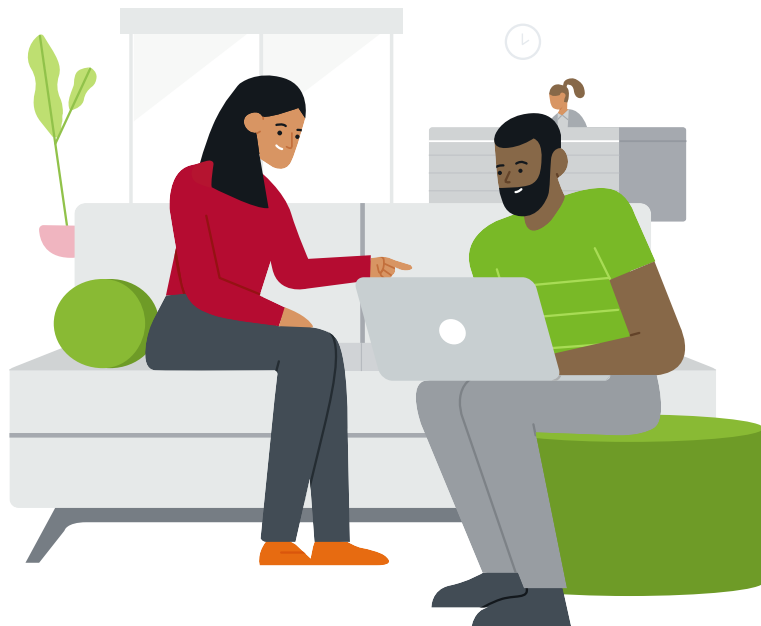
By building on the learnings from previous initiatives such as the Indigenous supplier program, other equity-deserving communities like people with disabilities can also benefit.

Near term actions

- Educate the procurement team on best practices, standards in vendor selections.

Long term actions

- Include accessibility criteria in procurement policies including requesting adhere to WCAG standards.
- Include accessibility questions in Requests for Proposals and Requests for Quotes.
- Evaluate vendor accessibility practices.
- Contractual obligations: include accessible products and services.
- Collaborate with vendors for improvements.
- Monitor and evaluate vendor performance regarding accessibility throughout contracts.
- Consider accessibility as part of metrics and scorecards.



Section Four

MONITORING, EVALUATION, AND REPORTING

BCLC considers accessibility to be an integral component of its Diversity, Inclusion, and Belonging program, and as such accessibility will play a fundamental part in developing an inclusive environment for players and employees alike.

Regular monitoring, evaluation, and reporting are required to make sure that all the applicable areas of accessibility can be implemented and sustained.

An annual accessibility plan update will be included in our Report on Multiculturalism, which is submitted to government.

How will BCLC retrieve information through its feedback process?

BCLC will use a 'complaints and kudos form' to receive feedback about accessibility. This form will allow BCLC to hear from the people about how to make processes and facilities more accessible.

Our Multi-Year Accessibility Plan will be revised as required by the legislation and coming accessibility standards.

What will BCLC do with feedback?

When received, this information will be collected in a secure database where it can be reviewed periodically by the Accessibility Project Working Group and the Accessibility Employee Resource Group.

Reported accessibility barriers will, if possible, be actioned within the timeframe of this accessibility plan, if they relate to the priorities, if not they will help inform the next plan's priorities.

How to give us feedback

- Link to Feedback Mechanism
- Alternative Formats

Appendices

DEFINITIONS

Accessibility

Accessibility is the work we do to ensure that people with disabilities can participate in society on an equal basis with others. It is a proactive, systemic approach to removing barriers that prevent equal and full access for disabled people.

BCLC Accessibility Employee Resource Group

The Accessibility ERG works to strengthen BCLC's inclusive culture, sense of belonging and empowerment for employees. The group supports the development of barrier-free processes; improve the employee experience for disabled people; and identify areas for improvement. More than half of the group's membership is comprised of individuals who self-identify as people with disabilities.

Barrier-Free BCLC

A barrier-free BCLC describes our aspirational goal and an action plan to create an organization where barriers to accessibility for people with disabilities are identified, removed, and prevented. The resulting culture is one where people with disabilities enjoy equal outcomes with non-disabled people.

Barriers

Anything that hinders the full and equal participation in society of a person with an impairment. Barriers can be caused by environments, attitudes, practices, policies, information, communications or technologies, and affected by intersecting forms of discrimination.

Types of barriers

Physical

How we design buildings, facilities, parking and washrooms and other built environments.

Attitudes

The stereotypes we believe, the assumptions we make about what a person can do, and the way we treat people.

Policies

How we design programs and processes, as well as the rules we create.

Information and Communication

The ways we share information including the printed materials, website content and marketing materials we create.

Technology

The websites and apps we host, the software and programs we use to do our daily work, and the technology used to deliver our services and products.

Diversity, Inclusion, and Belonging Committee

Consists of a diverse group of employees who champion DIB in the organization and provide insights from different lenses to inform our actions, enabling us to deliver better solutions for our employees, customers and communities.

Disability

The state of being unable to participate fully and equally in society due to an interaction between an impairment and a barrier. Impairments can be physical, sensory, mental, intellectual or cognitive. Impairments can be permanent, temporary or episodic.

Belonging

Belonging means an environment where people feel safe, secure, welcomed and are part of the workplace community.

Diversity

Diversity refers to the uniqueness and variety of individuals, traits, backgrounds, and ideas within BCLC and our community.

Inclusion

Inclusion is building a community where everyone is accepted, valued, and respected and embrace differences, perspectives, and diverse abilities.

Intersectionality

Intersectionality describes the way various forms of inequality, such as low income, race, and gender identity can work together to magnify marginalization or discrimination of people with disabilities.

Lived Experience

People with lived experience are those directly affected by disability. When we say lived experience, we mean knowledge based on someone's perspective, personal identities, and history, beyond their professional or educational experience.



RESOURCES TO SHARE

[UN Convention on the Rights of Persons with Disabilities \(UNCRPD\)](#)

[Canadian Charter of Rights and Freedoms](#)

[Accessible Canada Act](#)

[Accessible BC Act](#)

[BC Human Rights Code](#)

[BC Human Rights Tribunal](#)

[BC Ombudsperson](#)

[British Columbia Lottery Corporation \(BCLC\)](#)

[BCLC - Corporate](#)

[BC Gaming Commission](#)



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Total Estimated Pages: 47