

RESEARCH BRIEF

CometX Research & Training Centre

The accessibility gap in Canadian learning and development

Training decides who advances, not just who is hired. The data shows disabled and racialized workers face compounded, measurable barriers inside the very programs meant to develop them — and Canadian accessibility law is only beginning to say so explicitly.

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PREVALENCE

27% / 8.0M

of Canadians aged 15+ reported a disability in 2022 — up 5 points from 2017. Statistics Canada, 2024

EMPLOYMENT GAP

16 pts

gap in employment between working-age adults with (62%) and without (78%) disabilities. StatCan CSD, 2022

COMPOUNDED BARRIERS

16.5%

of Canadians with disabilities are also part of a racialized group — a population StatCan flags as facing "a complex set of challenges."

StatCan, 2025

LEGAL DEADLINE

2040

target for a barrier-free Canada under the Accessible Canada Act; mandatory digital-accessibility training begins Dec. 2027. ESDC

 Why it matters

L&D is where accessibility commitments succeed or quietly fail

Most accessibility conversations in Canada start with buildings and websites. Training is where the effects actually land: onboarding, mandatory compliance modules, professional development, promotion pathways, and the skills programs that determine who is considered for the next role. If any of that is inaccessible, a person can clear the hiring bar and still be shut out of everything that follows it.

Statistics Canada reported 505,900 job vacancies in the second quarter of 2025, alongside a labour market being reshaped by AI and sectoral shift — conditions the federal government says "can make it even harder for persons with disabilities to find and keep jobs, especially when workplaces aren't designed to be inclusive." The same report calls persons with disabilities "one of Canada's largest under-tapped talent pools." Training design is one of the few levers an employer fully controls.

01 — Disability

The employment and skills gap for persons with disabilities

In 2022, the employment rate for Canadians aged 16–64 with disabilities was 65.1%, against 80.1% for those without — a gap that widens sharply with severity: 50.4% for severe disability, 26.8% for very severe. Unemployment among people with disabilities (6.9%) ran nearly double the rate for people without (3.8%).

Without a disability



With a disability



Employment rate, ages 16–64, 2022. Statistics Canada, Labour Force Survey, 2023

Wages carry a parallel gap. Median hourly wages for employees with disabilities (\$26.00) ran 5.5% below employees without (\$27.50); among men with more severe disabilities the gap widened to 16.7% (\$24.99 vs. \$29.99). Poverty follows the same pattern — 10.6% of Canadians with disabilities live below the poverty line, against 7.4% of the general population.

What the gap is *not* explained by is qualifications. A 2026 Statistics Canada report timed to National AccessAbility Week found 34.0% of employed persons with disabilities were overqualified for their current role — essentially the same rate as employees without disabilities (32.7%). The barrier sits downstream of hiring, in how work, training, and advancement are actually delivered.



"Persons with disabilities represent one of Canada's largest under-tapped talent pools."

— Employment and Social Development Canada, 2025



02 — Legislation

Training is moving from good practice to legal requirement

Canadian accessibility law increasingly names *training* as a specific, auditable obligation rather than a general aspiration. The obligations differ by jurisdiction and organization size, which is itself a source of confusion for national employers.

LAW	APPLIES TO	WHAT IT REQUIRES FOR TRAINING
Employment Equity Act	Federally regulated employers, public service	Equitable access to training and promotion for four designated groups: women, Indigenous peoples, persons with disabilities, members of visible minorities
Accessible Canada Act (2019)	Federally regulated organizations	Barrier-free Canada by Jan. 1, 2040; staff who build, maintain, or procure digital technology must complete accessibility training — mandatory for large employers (500+) and medium employers (100–499) from Dec. 2027–2028
AODA (Ontario, 2005)	Every organization providing goods or services in Ontario	All staff and volunteers trained on the accessibility standards and the Ontario Human Rights Code, regardless of size; the fuller Integrated Standards apply to organizations with 50+ employees
Provincial acts (MB, NS, BC, ...)	Provincially regulated organizations	Analogous customer-service and employment training standards, on staggered timelines by province

Sources: Allyant, 2026; Fasken, 2025; Level Access, 2026; Ontario.ca

None of this is retroactive housekeeping. The Accessible Canada Act's employment standard is explicitly framed around the "seven phases of the employment life cycle" — recruitment through job separation — and training sits inside nearly every phase. Federally regulated employers now have a fixed compliance clock; everyone else in Canada is operating on a patchwork of provincial rules that mostly still require it too.

03 — EDIA

EDIA gave accessibility a seat at the table — but often the last one

Equity, Diversity, Inclusion and Accessibility (EDIA) has become the standard frame Canadian universities, public-sector bodies, and employers use to organize this work, extending the older EDI label by naming accessibility as its own pillar rather than folding it into "diversity." The Employment Equity Act's four designated groups — women, Indigenous peoples, persons with disabilities, and members of visible minorities — remain the backbone most EDIA strategies build on.

The problem the data points to is not that accessibility got added to EDIA — it's that it tends to arrive as a single training session bolted onto a strategy built for other groups first. That pattern isn't new: Canada's 1985 Royal Commission on Equality in Employment (the Abella Commission) found a lack of sufficient or appropriate training and education facilities among the core barriers facing all four designated groups, four decades before "EDIA" existed as a term. Naming accessibility in the acronym hasn't, on its own, closed that gap.

04 — Visible minorities

Visible minorities face a distinct, and growing, training-and-advancement gap

Visible minorities made up 26% of Canada's population in the 2021 census; Statistics Canada projects that share will reach 38–43% by 2041. Despite higher educational attainment than the general population, visible minorities remain underrepresented in management and professional roles, and visible-minority

women face what researchers describe as dual discrimination based on race and gender.

Population share, 2021 census



Projected share by 2041



Visible minority share of Canada's population, actual and projected. Policy Options / Statistics Canada, 2024

Representation gaps show up starkly inside the institutions meant to model equity: as of 2016, racialized employees held just 14.5% of federal public-service positions, and 9.4% of executive posts, at a time when the group made up an estimated 22% of the Canadian population. In the skilled trades, visible-minority journeypersons were less likely to work in unionized workplaces, and part of the income gap between visible-minority and non-visible-minority tradespeople could not be explained by any measurable factor other than group membership.

Training participation itself moves outcomes — when it's designed and followed through on. In British Columbia, visible-minority participants in employment training services saw employment rates rise 13.2 percentage points and annual earnings rise by \$6,673. In Alberta, a comparable apprenticeship support program lifted employment 4.2 points among visible-minority participants but was followed by an initial *drop* in earnings — a reminder that access to training and quality of training are separate variables, and only one of them shows up in enrolment numbers.



"A growing share of the population risks being marginalized" without action to integrate ethnocultural minority groups already in Canada — particularly the young — into the workforce.

— Policy Options / IRPP, 2024



05 — Intersection

Where disability and race meet, the barriers compound — and the data thins out

In 2022, 16.5% of Canadians with disabilities aged 15+ were also part of a racialized group. Employment and Social Development Canada states plainly that racialized and Indigenous populations experience higher rates of disability and "regularly face more significant discrimination due to both their disability and race."

Research on Canadian employment-support systems has found racialized job seekers with disabilities received support for shorter periods, with higher rates of unsuccessful case closures and less financial support than their peers. A separate intersectional analysis of Canadian workplace discrimination found that people at the combination of racialized status, disability, and lower social class faced significantly higher chances of experiencing discrimination than any single-axis comparison group.

The federal government's own assessment is candid about the limits of what's known here: "there is not much federal research on the intersection between disability and race in Canada." That gap matters for training design specifically — programs built to address disability and programs built to address race, run separately, are structurally unable to see the population living at both.

06 — In practice

What actually breaks inside a training program

Digital accessibility standards for learning content are converging on WCAG 2.2 Level AA as the practical bar for e-learning and LMS platforms, covering keyboard operability, captions and transcripts, colour contrast, and screen-reader compatibility. In audits of digital products and course content, a small set of failures recurs disproportionately:

Keyboard traps

Custom quiz widgets, video players, and course-navigation menus that a mouse operates but a keyboard cannot escape.

Uncaptioned video

Training video with auto-captions left unedited, no transcript, and no audio description where the visual carries the content.

Untagged course PDFs

Slide decks and handouts exported without reading order or tags — unreadable to a screen reader regardless of the content inside.

Forms without labels

Quiz and registration fields relying on placeholder text or colour alone, announced to no one using assistive technology.

Pattern drawn from published e-learning accessibility guidance (Training Industry, 2024; Accessibility, 2025) and consistent with what we see across our own WCAG 2.2 audit work at CometX — nine in ten engagements surface some version of this list, on public sites and internal training platforms alike.

 Our perspective

Accessible training isn't a parallel EDIA initiative — it's the mechanism EDIA runs on

The pattern across this data is consistent: the gaps aren't primarily about who gets hired, they're about what happens after. A 16-point employment gap and near-identical overqualification rates for disabled workers; a public service that has spent decades short of its own representation targets; training gains for visible-minority participants that evaporate when the program isn't designed well. Each of these is downstream of learning and development decisions — who a course was built for, whether a platform works with a screen reader, whether a promotion pathway assumes everyone learns the same way.

We think most organizations treat accessibility and EDIA as adjacent programs that occasionally reference each other: an EDIA training session gets scheduled, an accessibility statement gets published, and the actual learning infrastructure in between — the LMS, the course content, the onboarding modules, the leadership-pipeline programs — rarely gets audited with the same rigor as a public-facing website. That's backwards. Internal training is where advancement gets decided, which makes it higher-stakes than a marketing site, not lower.

And the compounding cases are the clearest evidence this needs deliberate design, not good intentions: a workforce where 16.5% of disabled Canadians are also racialized, served by programs built for one axis of identity at a time, in a country where — as Ottawa itself

admits — there is barely any research on the overlap. Closing that requires the same discipline research demands: measure who the program is actually reaching, disaggregate the data, and treat what you find as a design brief rather than a footnote.



Where CometX fits

Where we can help

This is the practice we run: WCAG 2.2, AODA, and Accessible Canada Act conformance audits that go beyond public websites to cover the learning platforms, course content, and internal tools employees actually train on — delivered as a prioritised, developer-readable fix list with retest built in, not a compliance score. Where a training program itself is the barrier, that's a fixable finding, the same as a contrast failure on a homepage.

- Extend an accessibility audit to your LMS, course authoring tools, and onboarding flows — not just your public site.
- Remediate existing course content and train the authors who build the next one, so accessibility stops being a retrofit.
- Run an EDIA assessment that disaggregates by disability and race together, so intersectional gaps like the ones above are visible in your own data, not just the national numbers.
- Commission applied research where the evidence is thin — the disability–race intersection is a stated federal data gap, and it's answerable at an organizational scale even where it isn't yet at a national one.

[Request an audit](#)[Explore our EDIA practice](#)

SOURCES

1. Statistics Canada, "Labour market characteristics of persons with and without disabilities, 2023," 2024.
2. Statistics Canada, "Labour market characteristics of persons with and without disabilities in 2022," The Daily, 2023.
3. Statistics Canada, "A demographic, employment and income profile of persons with disabilities aged 15 years and over in Canada, 2022," 2024.
4. Statistics Canada, "Accessibility in Canada: Results from the 2022 Canadian Survey on Disability," 2024.
5. Statistics Canada, "Work potential and overqualification status among persons with disabilities, 2022," The Daily, 2026.
6. Employment and Social Development Canada, Employment Strategy for Canadians with Disabilities: Annual Progress Report 2024–2025.
7. Employment and Social Development Canada, Employment Strategy for Canadians with Disabilities.
8. Statistics Canada, "International Day of Persons with Disabilities, 2025," The Daily, 2025.
9. Statistics Canada, "Highlighting the experiences of persons with disabilities," 2025.
10. Employment and Social Development Canada, Guidance for Providing Training on Digital Accessibility Fundamentals.
11. Allyant, "ACA Compliance: The Accessible Canada Act," 2026.
12. Fasken, "New Standards and Proposed Requirements Under the Federal Accessible Canada Act," 2025.
13. Level Access, "Canadian Accessibility Laws: ACA and AODA Guide," 2026.
14. Government of Ontario, "How to train your staff on accessibility."
15. EBSCO Research Starters, "Employment in Canada."
16. Policy Options / IRPP, "Visible minorities have difficulty accessing the labour market," 2024.
17. Public Service Alliance of Canada, "Employment equity: A tool kit for PSAC members."
18. Statistics Canada, "Visible minority women," Women in Canada, 2015.

19. Statistics Canada, "Labour market outcomes of journey persons designated as visible minorities," 2021.
20. Social Research and Demonstration Corporation, "Gaps in active measures programs among Black people in Canada," 2023.
21. Public Policy Forum, "Employment gaps and underemployment for racialized people," 2020.
22. Wiley / International Journal of Social Welfare, "Representation of visible minorities in Canada's public service," 2023.
23. PMC, "Exploring Intersections of Race and Disability in Canadian Employment Support Systems."
24. Canadian Journal of Sociology, "Discrimination in the Workplace in Canada."
25. Training Industry, "Creating Accessible eLearning Content," 2024.
26. Accessiblū, "The Ultimate Guide for an Accessible LMS," 2025.

Prepared by CometX Research & Training Centre. Figures are drawn from the secondary sources cited above and were current as of publication; several Statistics Canada series (the Canadian Survey on Disability, Labour Force Survey supplements) are updated on federal release schedules — check the linked source for the latest figure before citing further. cometx.ca/research