The Accessible Procurement Research Project (APRP)

Driving Accessibility and Positive Change in Canadian Procurement Practices

Public Report
January 2025

Prepared by Adaptability Canada



In Partnership with
Inclusive Workplace Supply Council of Canada
Accessibility Institute, Carleton University
Ernst and Young







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Forward

The Adaptability Canada research team and partners would like to express our profound thanks to David Hunt and Kristine Houde for lending their expertise and experience with diversity, equity, and inclusion as well as procurement to this research report.

We would also like to thank the following organizations for their efforts and contributions:

The Inclusive Workplace Supply Council of Canada

Accessibility Institute, Carleton University

Ernst and Young

The opinions and interpretations in this publication are those of the author and do not necessarily reflect those of the Government of Canada.

Funded by the Government of Canada | Financé par le gouvernement du Canada | Canada

Terms and Definitions

Accessibility - Refers to the design of products, devices, services, or environments for people who experience disabilities. (ASC definition)

Barrier - "means anything — including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice — that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation." (ACA definition)

Barrier Hierarchy – Barrier hierarchy exists within corporate procurement where one barrier (defined as a source barrier) creates other barriers beneath it, leading to a system of interdependent barriers.

Source Barrier – A barrier that creates other barriers beneath it.

Barrier Duality – Barriers identified as having the characteristics of 2 types of barriers

Best Practice(s) - A set of guidelines, ethics, or ideas that represent the most efficient or prudent course of action in a given business situation.

Direct Spend - Procuring things that will eventually be sold to customers such as parts.

Disability - "means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society. (handicap)" (ACA Definition)

Disabled Supplier/Disability-Owned Business - A business that is at least 51 percent owned, operated, and controlled by a person(s) with a disability.

Diverse Supplier - A business that is at least 51 percent owned, managed, and controlled by an equity-seeking community or social purpose enterprise. These communities include, but are not limited to, women, Aboriginal people, racial minorities, persons with disabilities, newcomers and Lesbian, Gay, Bisexual, Trans, Queer, 2-spirit (2SLGBTQI+) community.

Diversity - The practice or quality of including or involving people from a range of different social and ethnic backgrounds and of different genders, sexual orientations, etc.

Indirect Spend - Procuring things needed to maintain the business such as office supplies.

Internal Buyer - The individual or department within an organization that has requested the item or materials.

Private sector - The part of a country's economic system run by individuals and companies, rather than under the control of a government entity.

Procurement - The process of purchasing goods or services and is usually in reference to business spending.

Purchaser/buyer - Responsible for sourcing goods and services that meet company operation requirements.

Service Veteran Disability-Owned Business - A business that is at least 51 percent owned, operated, and controlled by someone who is both a veteran and sustained their disability during service.

Small and Medium Enterprise (SME) – In Canada, a small enterprise is described as a business with fewer than 100 employees. A medium enterprise is described as having between 100 and 499 employees, with organizations above 500 employees described as large.

Social Procurement - The achievement of strategic social, economic and workforce development goals using an organization's process of purchasing goods and services.

Stakeholder - A stakeholder is a party that has an interest in a company and can either affect or be affected by the business.

Supplier/vendor - A party in the supply chain that makes goods and services available to companies.

Tier 1 Supplier - Large, often international supplier providing goods and services directly to purchaser.

Tier 2 Supplier - A smaller, less known supplier providing goods and services indirectly to purchaser through Tier 1 supplier.

Veteran Disability-Owned Business - A business that is at least 51 percent owned, operated, and controlled by someone who is a veteran with a disability not incurred in service.

Universal Design - The design and composition of an environment so that it can be accessed, understood and used to the greatest extent possible by all people regardless of their age, size, ability or disability. (National Disability Authority definition)

Background

In December 2022, Adaptability Canada received funding to pursue a first-of-its-kind research project exploring the barriers people with disabilities, as well as disabled owned companies, face accessing or working inside corporate procurement.

About APRP

The Accessible Procurement Research Project (APRP): Driving Accessibility and Positive Change in Canadian Procurement Practices

The Accessible Procurement Research Project (APRP) is a comprehensive study conducted in Canada to examine and address accessibility issues within procurement practices.

The APRP aims to identify barriers and propose potential solutions to promote accessibility in procurement processes. Through this research initiative, we seek to engage Canadians and drive positive change regarding best practices in procurement, removing barriers for people with disabilities while enabling their meaningful participation in procurement activities and opportunities.



Advancing Accessibility in Canadian Procurement in Alignment with Government of Canada Commitment

The APRP is part of the research program led by Accessibility Standards Canada (ASC), an organization within the Government of Canada dedicated to advancing accessibility and inclusivity in Canada. The Government of Canada, through the Accessible Canada Act (ACA), has also demonstrated a strong commitment to improving accessibility across various sectors, including procurement. The APRP aligns with this commitment and supports the government's efforts to create a more accessible and inclusive society.

A Collaborative Endeavor: Uniting Partners in Research for Accessible Procurement in Canada

The report is a collaborative effort involving multiple partners, including researchers, organizations, and experts in the field of accessibility and procurement.
These partners have worked together to conduct extensive research, interviews, case studies, and barrier identification activities.
The research was conducted from January 2022 through December 2023, during which data was collected and analyzed to generate valuable insights for enhancing accessibility in procurement practices.

About Adaptability Canada

Empowering Accessibility and Inclusion:
The Mission of Adaptability Canada

Adaptability Canada is an organization focused on promoting accessibility and inclusion in Canada. Our mission is to create a barrier-free society by providing innovative solutions, services, resources, and expertise to enhance accessibility for individuals with disabilities.

Through its work, Adaptability Canada drives positive change across many accessibility barrier areas in collaboration with businesses, government entities, and the public, fostering a more inclusive Canada.

Research Project and Team

The research project was divided into 3 parts:

1. Global Literature Review
2. Interviews with Procurement Personnel and Disabled Suppliers
3. In-depth Process Review

This project benefited from collaboration with experts in both accessibility and supplier diversity from the Canadian public, private, and non-profit sectors.

The team included:

- Jeff Wilson, report author and CEO of Adaptability Canada, and his senior research and design team
- Inclusive Workplace and Supply Council of Canada (IWSCC)
- Carleton/Accessibility Institute (formerly READ)
- Ernst and Young (EY)

Due to the limited existing knowledge on accessible procurement, the research strategy was to go both "wide and deep." This meant understanding the human construct of procurement at a deep level, including how it works, who is involved, and how the personal and lived experiences of the many stakeholders involved in procurement are acknowledged in policy. The team also needed to understand procurement from a global perspective to uncover best practices, innovations, and insights from a broader community that could inform Canadian organizations, including governments.

Phase 1: Literature Review

In Phase 1, the team completed a comprehensive global literature scan focused on the following:

- The state of supplier diversity, with a particular focus on disabled-owned suppliers.
- The state of accessibility in procurement.
- Innovation and best practices in procurement and supplier diversity as it pertains to accessibility.

Phase 2: Interviews with Stakeholders

Informed by the literature review, Phase 2 focused on one-on-one interviews with corporate procurement personnel and disabled-owned suppliers to capture a holistic perspective from all stakeholders. A key takeaway from the interviews was the ability to understand in-depth procurement policies and processes, most of which are enabled by enterprise-level technology.

Phase 3: Process Review, Case Study and Gathering Research Insights

In Phase 3, the team applied their research insights, including in-depth process mapping, to truly understand barriers, where/when/why they happened, and who they impacted. This allowed the research team to identify new categories of barriers specific to procurement, and a hierarchical structure of barriers and how they connected.

The team then explored the impact these barriers had on each stakeholder group to restrict, prevent, or diminish the experience of people with disabilities.

The State of Procurement and Supplier Diversity

A Global Perspective

The Vital Role of Procurement

Procurement plays a crucial role in civil society and the economies of Western countries. It involves acquiring goods and services that governments, organizations, and businesses need to operate effectively. By ensuring the availability of necessary resources, procurement supports the delivery of public services, stimulates economic growth, and drives innovation. It directly influences the functioning and success of all sectors, including healthcare, transportation, infrastructure, and technology.

Guiding principles of procurement include maximizing value for money; complying with laws, regulations, and industry standards; and managing financial or operational risk. Increasingly, organizations are also seeking to achieve higher environmental and social standards from their suppliers.

How can procurement be inclusive, and still meet its financial and compliance obligations?

The Importance of Research in Advancing Accessible Procurement Practices

Research is essential for understanding lived experience, identifying barriers, generating ideas, and setting standards for accessible procurement, forming a solid basis for evidence-based decision-making.

This first-of-its-kind project aims to:

- Assess the current state of procurement, including stakeholders, roles, functions, and components.
- Examine supplier diversity programs to understand their impact on disabled-owned businesses and people with disabilities in procurement.
- Identify and analyze barriers to people with disabilities in procurement and supplier diversity.

Research identifies best practices, innovative solutions, and potential policy changes to improve accessibility in procurement. By offering evidence-based recommendations, it supports the development of standards and guidelines that promote inclusive procurement practices.

The Impact of Today's Procurement on Individuals with Disabilities

Through the research and interviews, several things became immediately clear:

1. Accessible procurement affects people with invisible disabilities far more than those with physical disabilities as procurement is most often a digital or remote undertaking versus meeting in a physical location. Where it requires physical attendance (a construction walk-through for example), physical accessibility needs to be addressed as an integrated part of procurement.

2. Both internal buyers and disabled suppliers struggle to comprehend and complete the full range of tasks, activities, and documents within procurement processes. This complexity is based on legal language of documents, widespread use of acronyms, poorly designed technology, complex multi-step processes, and cognitively burdensome tasks.[1]

"The contracts are complicated, and small companies just aren't used to it. They don't have the experience or advice, and it becomes difficult and a truly unpleasant experience."

- Head of Accessibility, Crown Corporate

"Generally, they're a pain to complete. Long and labour intensive, a lot of rules you have to follow. In my particular case I'm visually impaired. I'm a slow reader so it can be annoying to navigate through documents and it takes a lot of extra time."

- Disabled Supplier, Software

"Simplification. There's so much that is boilerplate that doesn't apply. Especially if it's your first time around, it's daunting. You'll spend a huge amount of time reading through redundant information. The source is mostly organizational laziness."

- Disabled Supplier, Marketing

[1] Montalban-Domingo et al, 2018

People with invisible disabilities meet a complex set of layered barriers when they participate in a procurement operation or task. These barriers are part of a systemic approach designed to ensure legal compliance and minimize risk, so the barriers occur in every part of procurement, regardless of activity. Therefore, the impact on people with disabilities, preventing their involvement or making participation overly difficult, is widespread and remedies to remove barriers in procurement are poorly understood or focus on reacting to issues, such as making an important document accessible, according to interviews.

> "We're too large, very complex. A very strong, very large organization where it can easily be difficult to move things when you need to. From time-to-time people get used to having the same attitude, this is how we used to do things, keeping status quo. Technology is a big one as well, if all the requests you make are based on a particular technology and it's not accessible to people with disabilities or a particular group of people with disabilities. It's systemic, historical, and attitudinal."
>
> - HR Leader, Crown Corporation

The result is the reduced participation of people with disabilities at every level, whether as suppliers, procurement professionals, or employees within the organization. This exclusion limits the success of disabled-owned companies and the advancement and participation of people with disabilities in employment opportunities, public services, education, and other essential aspects of life.

Further, when procurement processes and the goods and services acquired are not designed with accessibility in mind, it creates barriers that exclude people with disabilities from participating fully in society. It perpetuates inequality, restricts independence, and hampers the overall well-being and socio-economic inclusion of individuals with disabilities.

Navigating the Procurement Lifecycle

The procurement lifecycle is a complex process that involves various stages, including planning, sourcing, contracting, and performance evaluation. Each stage presents unique challenges and opportunities for promoting accessibility. From setting requirements and specifications to evaluating bids and monitoring performance, ensuring accessibility throughout the entire lifecycle requires a comprehensive understanding of the procurement process. The APRP recognizes this complexity and seeks to provide insight, guidance, and recommendations at each stage to foster accessible procurement practices.

Collaborative Engagement in Advancing Accessible Procurement

Addressing accessibility in procurement requires the inclusion of multiple perspectives and voices. It is essential to engage stakeholders such as individuals with disabilities, advocacy organizations, government agencies, procurement professionals, and diverse suppliers. By bringing these diverse voices to the table, the APRP aims to create a comprehensive and inclusive understanding of the challenges, needs, and opportunities related to accessible procurement. This collaboration helps raise awareness about the importance of accessibility, and promotes collective efforts to drive meaningful improvements in procurement practices.

The Vital Role of Supplier Diversity in Accessible Procurement

Considering supplier diversity forms a key part of the APRP and holds significant importance within the broader procurement ecosystem. Supplier diversity focuses on promoting and supporting businesses owned by individuals from traditionally underrepresented groups, including minority-owned, indigenous-owned, 2SLGBTQI+-owned, women-owned, and disabled-owned enterprises. By actively seeking out and engaging diverse suppliers, organizations can broaden their supplier base, foster competition, and promote economic opportunities for underrepresented groups.

Diverse suppliers often offer unique perspectives, creative solutions, and competitive pricing, which can result in better value for money and improved outcomes in procurement projects. Moreover, supplier diversity initiatives can empower marginalized communities by providing them with access to business opportunities, which can reduce inequalities and promote socio-economic inclusion.

By integrating supplier diversity considerations into the APRP, the project acknowledges the interconnectedness between accessibility and diversity in procurement. It recognizes that creating an accessible procurement environment goes hand in hand with ensuring equal opportunities for all diverse suppliers. Together, these efforts contribute to building a more inclusive and equitable procurement ecosystem that benefits individuals with disabilities, underrepresented groups, and society as a whole.

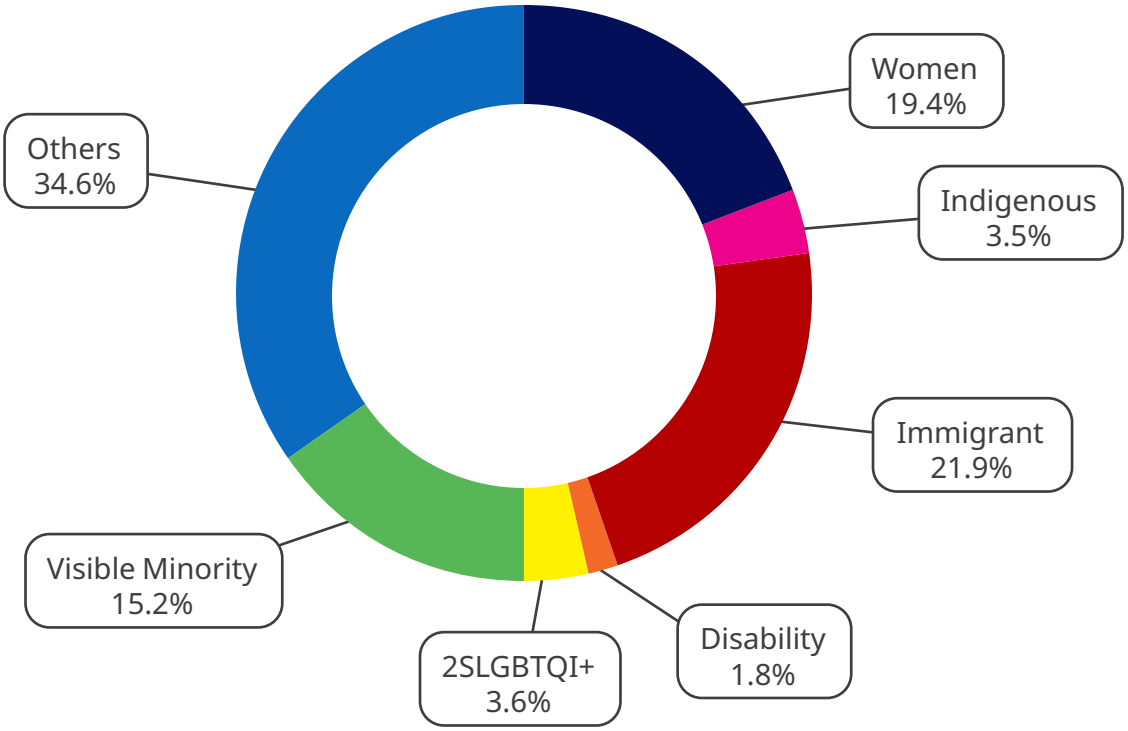


Figure 1. Private sector business counts by majority ownership, second quarter of 2024.

Table 1: Private Sector Business Counts by Majority Ownership

Private sector businesses by majority ownership	Number of private sector businesses	Percentage of total private sector businesses
All Ownerships	1,034,618 (A)	100.0%
Women	200,677 (A)	19.4%
Indigenous	35,927 (C)	3.5%
Immigrant	226,683 (A)	21.9%
Disabled	18,731 (C)	1.8%
2SLGBTQI+	37,691 (D)	3.6%
Visible Minority	157,545 (B)	15.2%

Symbol Legend:
A: Excellent data quality B: Very good data quality C: Good data quality D: Acceptable data quality



A key challenge to supplier diversity for disabled-owned businesses is the disparity between the number of certified diverse suppliers (less than 50) compared to the number of disabled-owned businesses (more than 18,000) in Canada. This enormous delta between the 2 suggests several key points to consider:

- While supplier diversity is relatively mature in Canada, Inclusive Workplace and Supply Council of Canada (IWSCC), established in 2016, is newer and under-funded compared to other supply councils impacting both community and resource development.
- Disabled-owned businesses are reluctant to self-identify.
- Some businesses identifying as disabled-owned to Statistics Canada may not all be eligible to be certified by IWSCC for various reasons.
- Accessibility legislation has not yet properly addressed the lack of awareness, engagement, and support for disabled-owned businesses.

Research Findings

Literature Review

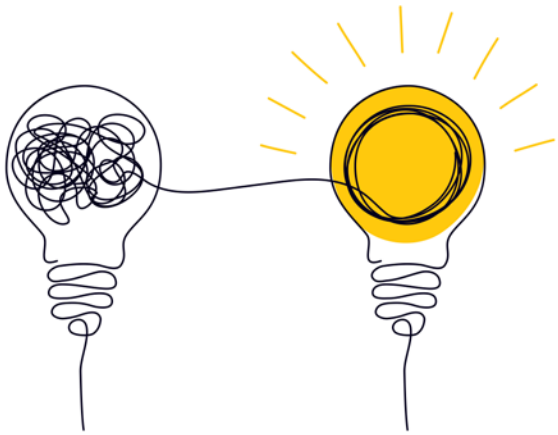
The literature review included a global scan of several subjects related to procurement, and each organization on the research team focused on independent areas. Adaptability Canada studied the state of procurement and priorities of procurement professionals. The IWSCC studied the state of inclusion initiatives like supplier diversity. The Accessibility Institute studied innovations in best practices for inclusion and accessibility.

The collaborative study identified 82 sources that provided useful research data. 23 Key Sources, including scholarly articles, public legislation, and research reports from reputable organizations (examples: United Nations Economic and Social Commission for Asia and the Pacific (UNESCAP), World Trade Organization (WTO), and 59 Supporting Sources, including the types above, as well as websites, digital toolkits, open-source standards such as W3C, and blog and digital news articles.

Research Methodology

This research study began with the goal of understanding the complexities of procurement, assessing how accessible it is now, and considering ways to improve accessibility in the future. In this initial phase of the study, using secondary research, our aim was to build an understanding of:

- The current state of procurement, and the priorities of procurement professionals.
- The current state of accessible procurement strategies, including social procurement and supplier diversity.
- The emerging innovations, strategies, and best practices to making participation in procurement more accessible for all related groups.



To ensure a shared focus the team used common research parameters in their search (see Table 2).

Table 2: Research Parameters	
Regions	**Industries**
• Asia-Pacific: Australia, New Zealand, Singapore, Japan and Hong Kong • Europe Union: UK, Germany, France, Switzerland, Finland, Sweden and Norway • North America: USA and Canada • Latin America: Costa Rica	Financial, government, Consumer Packaged Goods (CPG), Technology, Transportation, Real Estate, Education, Professional Services
Stakeholders	**Keywords**
• Diverse Suppliers - specifically disabled-owned • Internal buyers - particularly with disabilities • Procurement professionals - particularly with disabilities • Diversity, Equity, and Inclusion (DEI) - DEI Team • Technology vendors including third-party platforms • Tier 1 suppliers - primary vendors tasked with large projects	Accessible procurement, barriers to procurement, supplier diversity (by region or by corporation), best practices, challenges in supplier diversity/accessible procurement, supplier code of conduct, and procurement policy

The initial literature scan revealed the following findings regarding the current state of procurement, including emerging trends in accessibility and strategies to improve the inclusion of minority group suppliers in procurement.

Supplier Diversity Programs

Supplier Diversity, as a corporate program, is mature for equity-seeking groups like women, indigenous peoples, and visible minorities. For stakeholder groups like 2SLGBTQI+ and people with disabilities, supplier diversity is still developing. Within Canada in particular, supplier diversity for disabled-owned suppliers is in its infancy, with industry uptake progressing slowly.

From the global literature review, the research team identified many best practices from other countries and other stakeholder groups that could provide excellent models for success, particularly based on Indigenous supplier diversity programs:[2]

- Social Procurement and Supplier Diversity: Social procurement encompasses strategies that leverage procurement to achieve social goals such as inclusion, job creation, sustainability, and civil development.[3,4]
- Social Value Measurement: Social procurement is guided by the principle of social value, which measures a project's positive effects beyond profit and cost-effectiveness.
- Supplier Diversity Strategy: A form of social procurement that specifically aims to improve the inclusion of diverse-owned businesses in supply chains, focusing on creating value by adding more diverse-owned businesses and generating tangible and measurable economic impact and influence for those businesses.
- Economic Impact of Disabled Business Owners: Supplier diversity programs highlight the improved economic impact and influence of disabled employers and the creation of jobs for people with disabilities through disabled business owners.[5]
- Accessibility Improvement: Supplier diversity programs also have the potential to improve accessibility by increasing the capacity of businesses experienced in accommodation and enhancing the economic influence of disabled individuals.
- Certifying Bodies and Documentation: Supplier diversity programs rely on certifying bodies, such as supplier diversity councils, to verify the diverse status of businesses. These organizations require concrete and legally binding documentation to certify businesses owned by members of the diverse group they support. Disability councils, for example, may consider medical records and government status to ensure authenticity and reduce fraud.
- Global Presence of Supplier Diversity Programs: Supplier diversity programs originated in the United States but have since spread worldwide, with a more established presence in North America, Australia, the United Kingdom, and Europe.

[2] National Indigenous Australians Agency, 2020
[3] Nakabayashi, 2010
[4] Holford et al, 2009
[5] Nakabayashi, 2010

Table 3: Case Study - Canadian Postsecondary Work in Accessibility
• Queen's University has developed a 'working' social procurement framework that includes supply-chain diversity, accessibility for Ontarians with disabilities, and increasing the Indigenous supplier base. Rated accessibility criteria are included in all Requests for Proposals (RFPs) over $100,000.[6] • York University adopted a stand-alone social procurement Policy (a first in Canada) addressing supplier diversity and workforce development[7] , and Carleton University Incorporated sustainable procurement language addressing environmental sustainability, healthy communities, and community impact in its 2019 procurement policy.[8] • York University incorporated weighted social procurement criteria into its RFP for general contracting services for the new School of Continuing Studies.[9] • MaRS worked with Toronto Metropolitan University, the University of Toronto, and the University of Toronto Scarborough to develop a social enterprise procurement playbook, Buying with Impact, aimed at advanced education institutions.[10] • In Ontario, a number of colleges and universities participate in AnchorTO, a network of 18 public-sector institutions with operations in Toronto who together leverage their purchasing, hiring and/or investment to achieve inclusive economic development outcomes. These include George Brown College, Centennial College, Seneca College, University Toronto, Toronto Metropolitan University, and York University.[11]

Procurement: Policy, Process, Technology, Communications, and Documents

Findings from the Literature Review

The study examined various aspects of procurement and analyzed 82 sources, including 23 primary and 59 secondary sources. While direct examples and references to accessible procurement were difficult to find, the research identified an initial collection of challenges faced by disabled suppliers and people with disabilities inside the large procurement organizations, as well as shared barriers impacting both parties:

- Key Supplier Barriers: Discrimination, financial constraints, and complex processes.
- Key Purchaser Barriers: Technology adoption, workload, agility, and responsibility.
- Shared Barriers: Resource limitations, limited awareness of each other, poor awareness of accessibility needs in procurement, and gaps in stakeholder involvement.

[6] Queen's University, Overview of Sustainable Procurement
[7] York University, Social Procurement
[8] Carleton University, Procurement Policy, 2023
[9] York University, Social Procurement
[10] Ahloy et al, 2019
[11] AnchorTO website

The global literature research provided recommendations to address these barriers, including:

- Improve awareness and stakeholder engagement internally and in supplier community.
- Institutionalize inclusive practices by ensuring technology systems underpinning procurement meet the highest standards for accessibility.
- Create a legislative framework and reliable funding resources to support disabled-owned companies.
- Promote supplier diversity and ensure a bias-free approach to purchasing.

However, the research also identified gaps in knowledge, including:

- Lack of data on disabled-owned firms.
- Limited understanding of invisible disabilities as it pertains to procurement.
- Limited knowledge on accessible procurement in the global market.
- Unclear ownership of knowledge in this area.
- Impact of regulation and trade treaties on ability to remove barriers in procurement.

Best Practices and Innovation in Procurement and Supplier Diversity

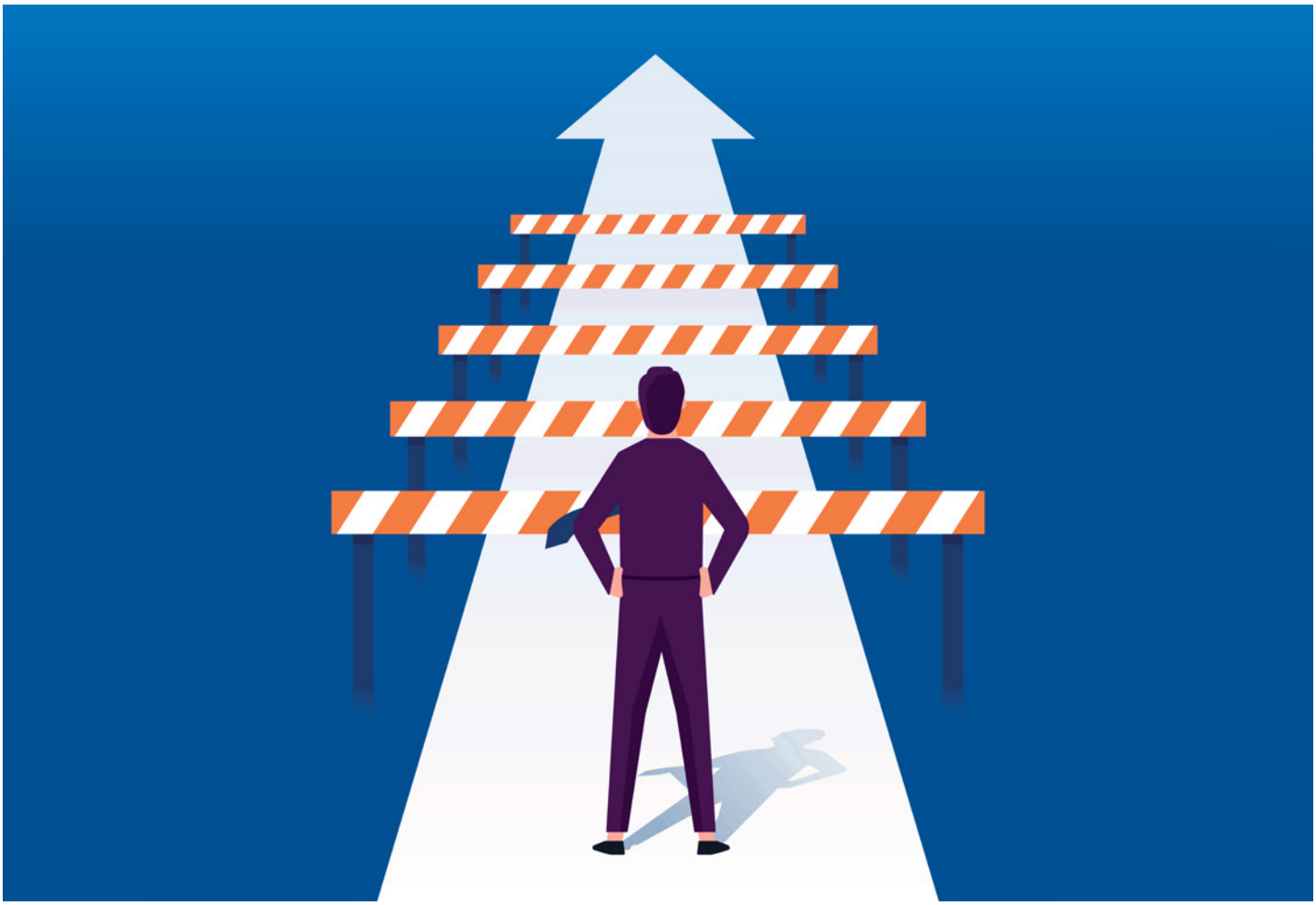
Through the literature research, the team identified several promising programs in other countries that could inform the development of more progressive accessible procurement and supplier diversity policies and programs in Canada.

Australian Government Indigenous Policy (IPP)[12]

Established in 2015 to stimulate indigenous entrepreneurship, businesses, and economic development, the IPP is focused on creating multi-sector opportunities for Indigenous business to participate in the economy. Considered one of the most successful policies in the world, the IPP consists of three parts:

1. Targets for annual volume and value of contracts to be issued to Indigenous-owned businesses.
2. A Mandatory Set Aside (MSA) for contracts valued between $80,000 to $200,000 AUD. The government is required to help identify an Indigenous supplier that can complete the work and provide expected value.
3. Mandatory Minimum Indigenous Participation Requirements which apply to contracts at $7.5 million or more. The contract holder must use Indigenous suppliers or employ Indigenous people as part of mandatory reporting requirements.

[12] National Indigenous Australians Agency 2020



The success of the program is in no small part based on approaching the participation of Indigenous business through both lower value, direct contracts with government and high-value Tier 1 supplier contracts.

Accessible Canada Act (ACA)

Passed in 2019, the ACA is a comprehensive approach to representing all people with disabilities. The legislation stands out in several ways that other similar legislation has not:

- The broadening of the definition of disability to recognize and include those with invisible disabilities (example: mental health, cognitive, neurological etc). This includes identifying those who suffer from permanent, episodic, or temporary disabilities.
- The ACA targets important areas of accessibility previously not included or lacking clarity in other provincial, national, or international legislation such as the procurement of accessible goods, services, and facilities. An Accessible Procurement Standard is currently under development and given the thoroughness of other ACA standards that have been published or released for public review, the expectation is that the procurement standard will be progressive, comprehensive, and binding.

Additionally, the following notable Procurement and Supplier Diversity councils and programs were also identified during the review.

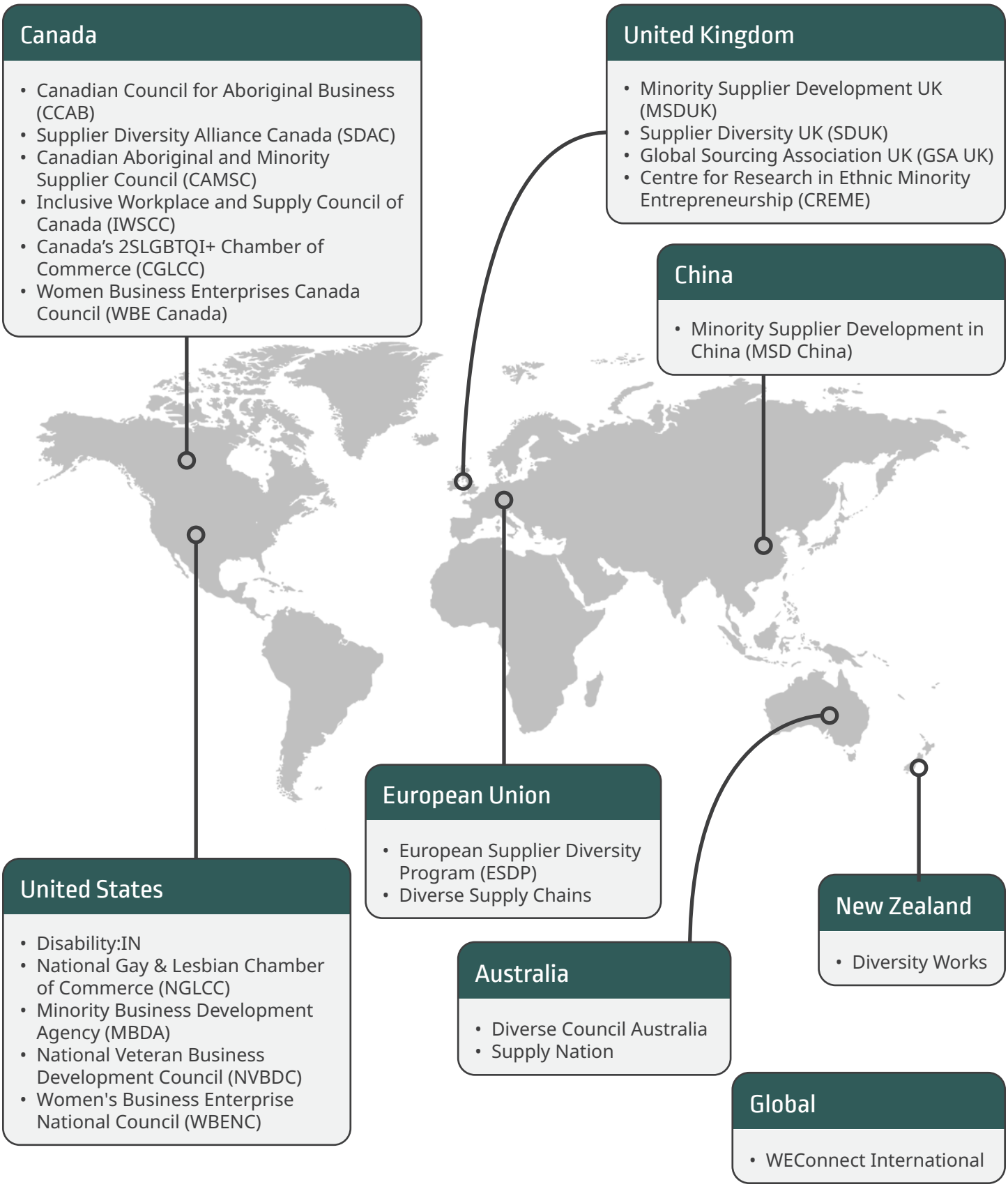


Figure 2. Major diversity councils and support organizations globally.

Stakeholder Interviews

Stakeholder Interview Methodology

Stakeholder interviews were conducted to validate research assumptions and address gaps identified in the literature review on procurement. A total of 60 interviews were conducted. The interviews involved 2 main groups:

1. Disabled-owned businesses and others from diverse groups
   - 28 interviews conducted
   - Aimed to understand supplier experiences and barriers in the procurement process.
   - Topics included e-procurement, networking, and emotional states during procurement.
2. Corporate procurement professionals
   - 32 interviews conducted
   - Assessed organizations' efforts to include disabled-owned businesses in supply chains.
   - Explored knowledge spread on inclusive policies.

All interviews were held via Video Conference, lasting 45 to 60 minutes, which allowed for open-ended discussions. These interviews contributed to a comprehensive understanding of the procurement process and identification of systemic barriers that often led to additional challenges in achieving inclusive and accessible procurement practices.

Top Areas of Need for Disabled Suppliers

Primary lines of questioning for suppliers focused on their experience with procurement and barriers encountered throughout the process. A quantitative rating exercise was designed to explore which parts of the process were perceived as most or least difficult to understand along with open-ended conversation walking through the broad stages of procurement (See figure 3).



Figure 3. The broad stages of procurement.

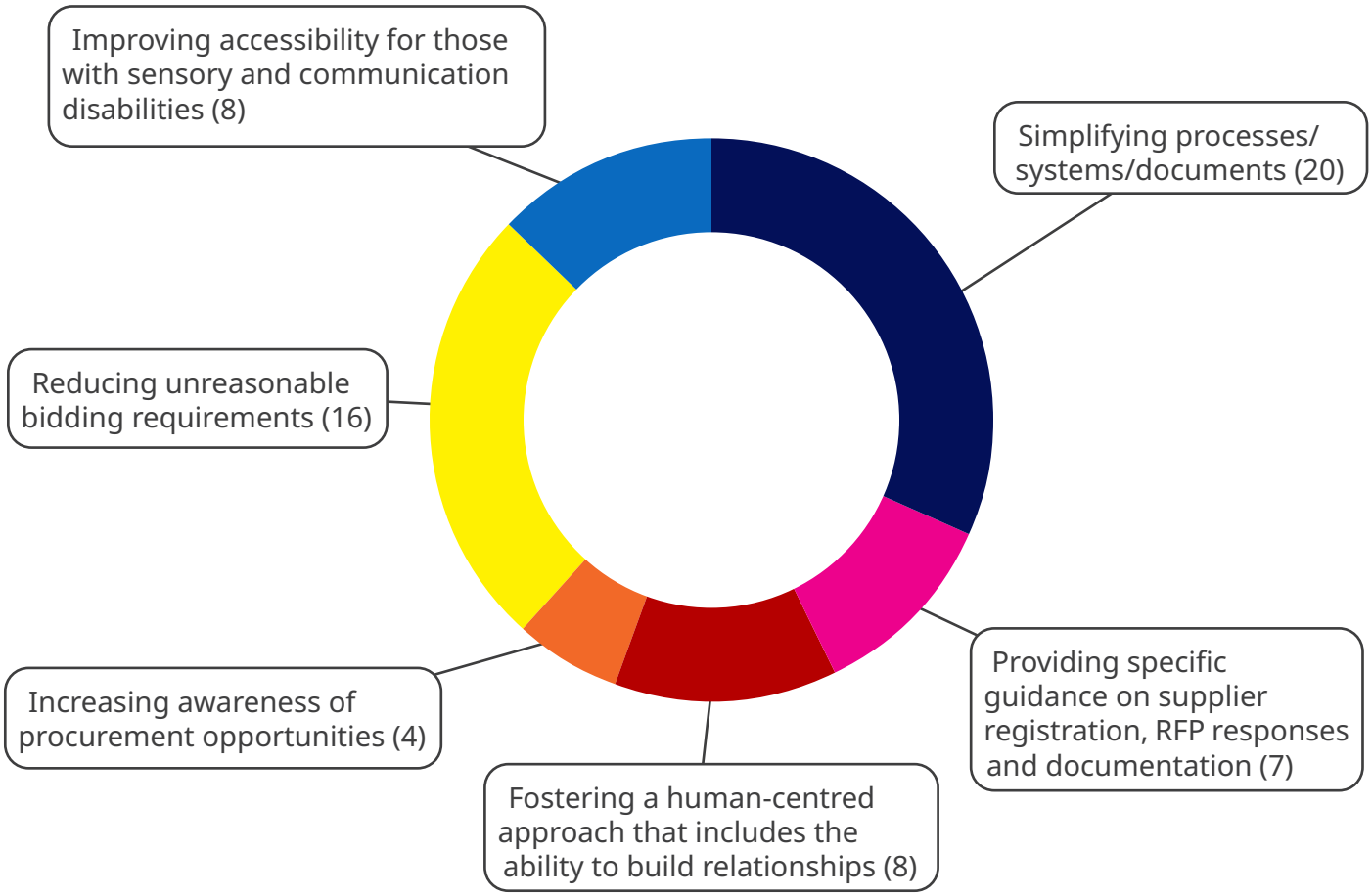


Figure 4. Number of supplier interviewees who responded by area of improvement.

The interviews also included additional topics like e-procurement platforms, networking, and supplier diversity, which were covered based on the supplier's experience with those areas. Interviews ended with an exploration of the emotional and attitudinal states suppliers experienced during procurement to highlight areas of the process that commonly create negative emotional states or raise a greater perception of bias or discrimination.

Suppliers expressed a desire for improvement in the following areas:

1. Simplifying processes/systems/ documents.
2. Providing specific guidance on supplier registration, Request for Proposal (RFP) responses and documentation.
3. Fostering a human-centred approach that includes the ability to build relationships.
4. Increasing awareness of procurement opportunities.
5. Reducing unreasonable bidding requirements.
6. Improving accessibility for those with sensory and communication disabilities.

Table 4: Quotes From Supplier Interviewees Based on Area of Improvement	
Area of improvement	**Quotes**
Simplifying processes/ systems/documents	"Simplify process from start to finish, plain language, open communication." - Graphic Designer
Providing specific guidance	"Lessening the manual input function, providing extra financial support incentives to navigate legal government tendering documents, making it more effective to have discussions between technical and contract authorities and suppliers." - Software Sales "You need to ensure that you have people strong in the points that you are weak. I've seen some organizations have a tutorial for how to use their tendering platform, but they aren't always right in your face. Having those right at the front and easy enough to go through would be a benefit." - Commercial Contractor
Fostering human-centered approach	"Human experience / interaction. Feeling like I'm doing business with a person." - Social and Emotional Learning Coach "Human experience, compassion regarding neurodiversity and invisible disabilities Supplier diversity specifically – connecting with more champions of diversity, meaningful effort towards a more just and equitable society, less tokenism." - Defense and Intelligence Consultant

We asked disabled suppliers the following question: What is the most important thing you would change about procurement to make it more accessible for people with disabilities? Answers and direct quotes from disabled suppliers are noted in Table 4 above and on page 23.

Area of improvement	Quotes
Increase awareness	"To let people know that it's even a possibility out there. I've sent RFPs that I've seen to other business owners, I still keep track of some, and she didn't even know that these existed. The education part where they should have some awareness, but also making it somewhat easier for people to be able to understand the process, access it and even do it. It's a lot of time spent trying to figure it out or get access to it without ever knowing if you're going to get anything out of it in the end." - DEI Consultant
Reducing unreasonable requirements	"Looked at becoming pre-qualified for public contracts and was very laborious and difficult to fit into their criteria." - Hiring Practice Consultant
Improving accessibility	"Ease of access, alternative formats, reduce stigma and attitudinal barriers. Increase collaboration between able-bodied and people with disabilities." - Accessibility Consultant

Top Areas of Need for Corporate Procurement

32 Interviews were held with corporate professionals. Like the supplier interviews, corporate interviews typically lasted 45 to 60 minutes and were performed via Video Conference, with a small number of longer interviews in which more than 1 professional was interviewed at a time. The interview team spoke primarily with stakeholders in procurement, with additional interviews including internal clients, accessibility professionals, Environmental/Social/Governance (ESG) and Diversity, Equity, and Inclusion (DEI) professionals, human resources, legal, compliance, and ethics. Positions ranged from junior associates to general management positions.

Lines of questioning for corporate professionals differed depending on their expertise, but included topics like:

- Job title and relationship with procurement.
- State, structure, and ownership of inclusion initiatives like supplier diversity.
- Internal accessibility standards and how they are developed.
- The availability of resources to meet internal goals, and the perception of barriers to acquiring those resources.



Corporate interviews were much more open-ended due to the differences in expertise. Interviewers relied on a standardized set of guiding questions but were free to expand on or explore relevant areas in more depth based on the interviewee. The question set for corporate professionals followed a similar path through procurement, exploring areas that professionals perceived as difficult for suppliers to complete as well as those that they found difficult or cumbersome for themselves.

While supplier interviews were designed to explore barriers identified in the literature review, corporate interviews were designed with Phase 1's key recommendations in mind (see section: Procurement: Policy, Process, Technology, Communications, and Documents). Conversations primarily focused on the ways in which organizations were already attempting to include more disabled-owned businesses in their supply chains, and where they felt they still needed improvement or were encountering hurdles.

A more passive goal of these interviews was to examine how far knowledge of inclusive policy or programming such as supplier diversity had spread through an organization, and how well these initiatives were understood by professionals in various areas of the corporation. Evidence gathered in Phase 1 Literature Review, suggested that accessibility and inclusion policy is generally siloed within an organization, and that institutionalization of these ideas along with executive support were necessary for meaningful progress. These findings were reinforced in the direct interviews. Lastly, corporate interviews were an information gathering exercise designed to contribute to a robust process map of procurement identifying all of the stakeholders involved when a disabled-owned business participates in the process. This process helped uncover what were eventually dubbed "Source Barriers," that often created additional barriers, complicating efforts to achieve more inclusive and accessible procurement practices.

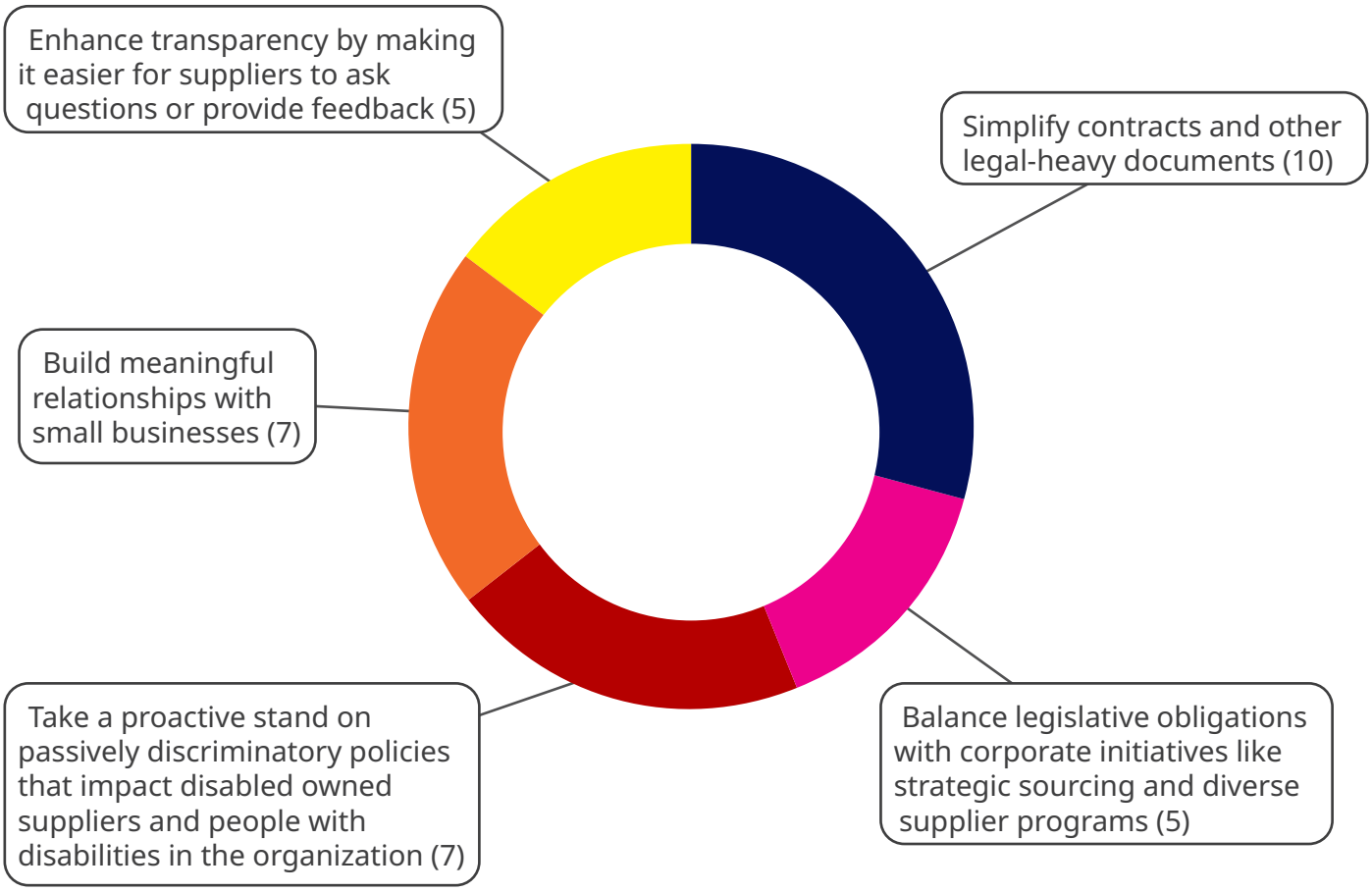


Figure 5. Number of corporate interviewees who responded by area of improvement.

Corporate procurement and corporate buyers suggest the following areas of improvement:

1. Simplify contracts and other legal-heavy documents.
2. Balance legislative obligations with corporate initiatives like strategic sourcing and diverse supplier programs.
3. Take a proactive stand on passively discriminatory policies that impact disabled owned suppliers and people with disabilities in the organization.
4. Build meaningful relationships with small businesses.
5. Enhance transparency by making it easier for suppliers to ask questions or provide feedback.

Table 5: Quotes From Corporate Interviewees Based on Area of Improvement	
Area of improvement	**Quotes**
Simplifying contracts	"It needs to be clear. They need to understand what we're asking. We need to limit ambiguity as much as possible." - Procurement Manager, Crown Corporation "To make them simpler, more concise, and to use plain language." - DEI Senior Advisor, Crown Corporation "Making it a lot simpler, less reliant on some of our external stakeholders (sometimes we know what we need to do but still need their input and that can slow down the process), and a mechanism for us to be involved earlier with our client groups. A lot of times they've worked on something for 6 months and they say, 'okay, go buy it' and now we're opening their documents and asking questions, and it slows the process." - Director of Procurement, Crown Corporation
Balancing legislative obligations with corporate initiatives	"Public procurement in Canada has a lot of rules with trade treaties. Writing non-biased (to one vendor) statements of work and deliverables, but it's very difficult. In Canada it's very hard to go out into the market space and do research, but there's nervousness around what they did do. There's a reservation for going out into the market space and doing pre-research which is a catch-22 because the suppliers who complain 'you did research, but you didn't ask me' so they don't go out and they write what they know, but then they have shortcomings. If you're doing an RFP it takes 6 months if you want to do an RFI to do research that's another 3 months. It's a different way to think about writing what you need in order to fit into the scoring matrix and be compliant with all of the trade treaties and bylaws. Our user guide for a client has 140 pages." - Purchasing Manager, Municipality

Area of improvement	Quotes
Taking proactive stand on passively discriminatory policies	"It starts with changing the landscape by providing training and education to your own people... The fear of the unknown is a major factor and as an organization we need to put more emphasis on basic training and awareness training on all, and I mean all, employees." - DEI Advisor, Crown Corporation "We need ownership and involvement from persons with disabilities within the organization... For a large organization we rely on executive support, that tone from the top helps at the grassroots level. We're very mindful we don't occupy other's spaces, when there's particular groups of employees that need support, we grow that, work with our allies, and seek support." - HR, Crown Corporation
Building meaningful relationships	"Operating like I was private sector where I could work with one supplier, develop a vendor network. Because I would be working from ground level and building my relationships with small businesses and potentially grow together. It works well and it's win-win, and maybe the supplier would be more keen to work with me compared to no where you deal with medium and large companies that you can't negotiate with. Maybe some contracts I'll compete, but the ability to choose. When you bid on everything then sometimes by the time you get the vendor to a good spot the contract is ending and you're going to market again, and you lose all that investment of effort and time." - Contract Manager, Crown Corporation
Enhancing transparency	"Clearer feedback processes for issues, we kind of assume that they're known, and they may not be as clear as we think they are. So, if there was something that was impeding someone from participating or wanting to participate, how do they let us know besides just choosing not to?" - Director of Procurement "Make sure that everyone interested in doing business is not shy to reach out, ongoing outreach and engagement in the market." - Director of Procurement, Crown Corporation

Research Insights

Overview

Given the general lack of referenceable sources in the literature review, the research team looked for patterns, structures, weaknesses, strengths, and connections. This broader understanding of "how it all fits together" enabled the team to develop defensible insights on barriers and potential remedies. The team had to consider whether barriers were stand-alone or a broader issue and what was the cause, and what was the effect? The team asked, how did everything connect, and were there critical areas of concern or opportunity? To keep the process transparent, the team shared progress with participating organizations to challenge insights, identify gaps, give critical feedback, and connect everything back to the research.

Due to the high complexity of procurement generally, several areas of concern were identified that require further research to understand their impact on procurement and people with disabilities involved in procurement. This includes strategic sourcing, regulatory compliance, legislative compliance, risk management and governance. Some of these gaps are addressed in the concluding section below (Where Do We Go From Here).

On Supplier Diversity

- Supplier diversity for disabled suppliers is in its infancy and has a very low uptake rate inside corporate procurement due to many factors, including:
    - Low number of certified disabled suppliers in Canada.
    - Lack of resources (staff and funding).
    - Poor awareness of disabled-owned companies as potential suppliers.

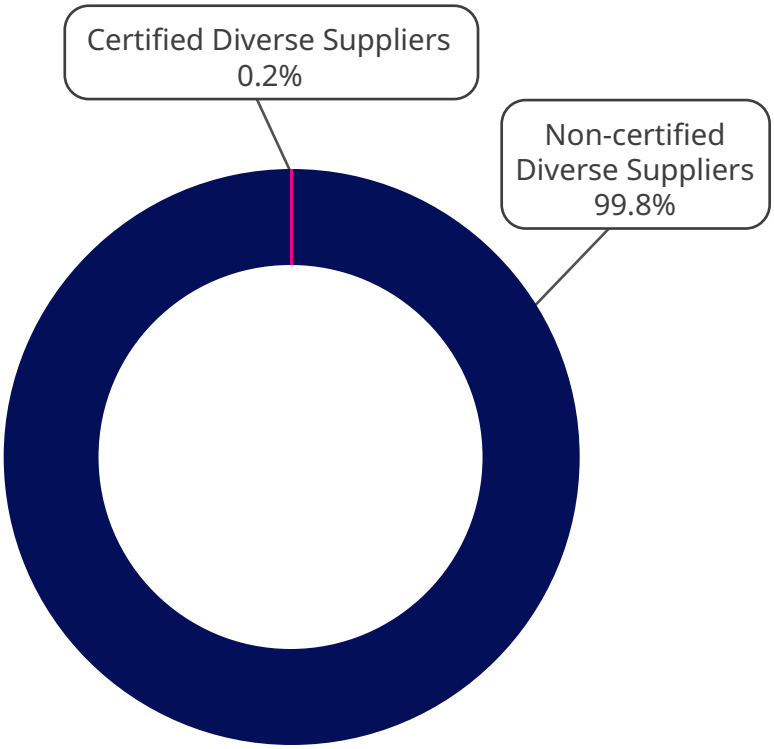


Figure 6. Percentage of certified disabled-owned suppliers out of total disabled-owned businesses in Canada, 2024.

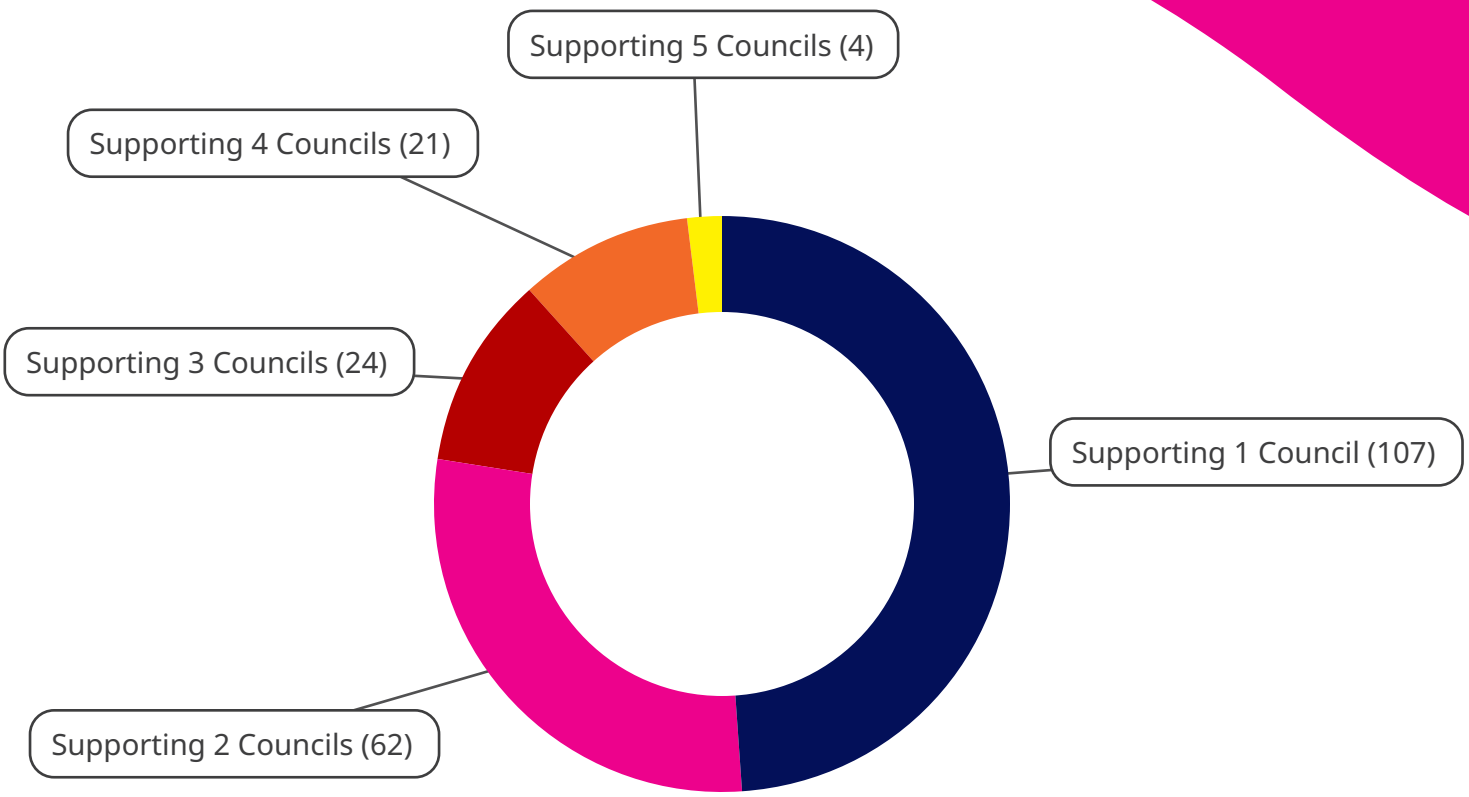


Figure 7. Number of councils supported by number of corporate entities.

- Best practices from other equity-seeking groups, primarily Indigenous programs and legislation from Australia and Canada, can be leveraged to advocate for, and enable more effective and transparent supplier diversity programs.
- In Canada, corporations tend to sponsor around 2 diversity councils (out of 5 main ones) on average, citing competing financial priorities and questions about value for dollars spent. The IWSCC's share of corporate sponsorship to support its advocacy work is significantly lower than that of other diversity councils. This can be attributed to a reluctance on the part of corporations that are already supporting 2 or more councils (see Figure 7), the size of IWSCC's certified supplier pool, and lack of awareness of IWSCC's work.
- DEI offices in most corporations are underfunded, and supplier diversity tended to be carried out "off the side of someone's desk" rather than being a full-time role with adequate resources (staff and funding).

On Corporate Procurement

- Corporate procurement is often under-resourced and frequently faces cutbacks, leading existing staff to take on more work beyond their normal role.
- Strategic sourcing and its push to consolidate the number of suppliers in supply chains poses significant complications to both the involvement of disabled suppliers and the remediation of barriers.
- There is high resistance to change and innovation due to several points of perceived and actual risk that could lead to personal or corporate consequences:
    - There is a belief amongst many procurement professionals and leadership that change/innovation is risky.
    - High levels of regulation lead to procurement policies designed to reduce corruption and fraud with a result of less and less flexibility in policies and purchasing mechanisms.
    - Organizations subject to trade treaties (government entities and Crown corporations) are vulnerable to having procurement decisions challenged before trade tribunals.
- There is a high level of interest in embracing accessible procurement practices. However, without the necessary knowledge, tools, and leadership, there is significant uncertainty and a lack of understanding of where to start and what to do.
- Procurement personnel raised concerns about organizational leadership's ability to recognize and prioritize the need for change to enable accessible procurement.
- All corporate interviews conceded that their procurement processes are heavily aligned to doing business with large, well-established suppliers, often dictated by policy and a drive to "shrink" the number of suppliers serving the corporation for reasons of risk aversion or administrative efficiency.



Understanding Procurement and Barriers in Procurement

The overall goal of the research project was to identify barriers in procurement, understand how they came to be, and how they can begin to be remedied or minimized.

First, we realized that because procurement is largely a virtual activity (example: digital or paper-based), the barriers we noted do not fit cleanly into traditional definitions. In procurement, we saw that barriers impacted those with invisible disabilities far more than those with physical disabilities.

Second, although the common belief is that most procurement activity revolves around the public RFP process, the truth is that the traditional RFP is simply the tip of an enormous iceberg of purchasing activities. We found that while barriers exist in the public RFP process (which we reveal in Part 3 of our project), it is simply a symptom of a larger issue inside the organizations we studied. As a result, our working definition of procurement within the project is very broad: Procurement is the act of doing business with thousands of suppliers to procure and distribute goods, services, and facilities to the organization and those it serves.

Finally, we identified 4 categories of barriers within procurement, which are described below in detail, which interacted in a kind of hierarchy.

The Nature of Procurement

To fully understand the nature of procurement, it is important to understand its components and core functions. Insights drawn from interviews and literature sources revealed the following structural components in Canadian procurement organizations:

Policy:

Policy encompasses the organization's core directives on the purchase of goods, services, and facilities to meet the organization's needs while ensuring the organization meets all compliance requirements (legislative, regulatory, risk management, financial policy).

Technology:

Technology varies but could consist of external procurement platforms (like MERX), third-party systems (Enterprise Resource Planning (ERP), enterprise procurement software and custom-developed systems. Furthermore, technology should include any adjacent technology platforms (intranets like Microsoft SharePoint) and websites (public and private) where procurement activities or communications take place.

Processes:
Procurement is heavy with complex processes that govern most tasks within procurement. Specifically, procurement processes are designed to keep stakeholders (internal and external) “colouring within the lines.”

Documents:
Procurement has different document types to meet specific requirements including: standard boiler-plate documents (people-created, system-created, and externally created using an external resource like a law firm or consultant), digital forms (digital documents, digital forms), and supplier documentation (feedback, questions, proposals, invoices).

Data:
The function of procurement generates tremendous volumes of data that directly relate to the purchase of goods, services, and facilities and the tracking, measurement, and reporting of procurement activities.

Communications:
Inter-stakeholder communications (internal to internal and internal to external) that use all modern communication channels.

Programs:
Programs are often a response to regulatory and legislative compliance requirements. Most common are programs such as ESG, Economic Development, and Supplier Diversity, although Indigenous procurement often rests outside or adjacent to Supplier Diversity.

While procurement is generally the same in large procurement organizations around the world, a couple key differences stood out from the research between Canada and other nations.

1. Regulatory Compliance: Canada is subject to more regulatory compliance due to national and international agreements and treaties. It is unknown how this impacts accessibility in procurement.
2. Legislation: Canada leads in legislation and the development of standards on accessible procurement and currently is one of the only nations to pursue a robust position on the matter.

Procurement, a human construct born of rigid thinking, has evolved to focus on facilitating efficient supply chains, competitive bidding, meeting regulatory requirements, and managing risk. Over decades, this effort has created complex systems of technology, policy, processes, documents, data, and communication layering complexity on every aspect of procurement.



Figure 8. Elements of procurement.

Barrier Categories

As noted above, our research revealed 4 distinctive categories of barriers which together drive a collective lack of accessibility in procurement. These barriers are interconnected and contribute to the challenges faced by individuals with disabilities when engaging with procurement organizations.

1. Organizational Barriers:
These barriers exist within the organizational structure and processes of a procurement system. They could include factors such as complex or rigid procurement policies and procedures, lack of coordination among different departments or stakeholders involved in procurement, or inadequate resources and infrastructure to support accessible procurement practices.
These barriers largely exist because procurement operates in a rigid organizational framework of long-standing legal rules, policy constructs, and risk management policy. This organizational framework, when faced with accessibility challenges, is very difficult to change.

2. Attitudinal Barriers:
These barriers emerge from how organizational barriers influence the behaviour of those tasked with protecting legal, policy and risk rules. The interaction between organizational and attitudinal barriers is critical because it tends to increase cultural resistance to change.

3. Emotional Barriers:
These barriers can best be described as how we make people feel through their interactions with complex processes. In procurement, our research identified typical emotional barriers such as fear, uncertainty, confusion, apathy, anxiety, frustration, and resentment.

4. Cognitive Load Barriers:
These barriers stem from the mental effort required to handle overly complex processes, information, documents, and procedures. In procurement, cognitive load barriers impact both those who establish the processes and those who must adhere to them. Navigating the complexities (legal compliance, risk management, technology) can potentially overwhelm anyone involved. Cognitive load barriers specifically impact people with invisible disabilities but also impact people without disabilities that may struggle with the layered complexity of procurement.
While the research found that procurement teams had a high level of competency and comfort on the complex aspects of procurement, that experience was due in no small part to a long learning curve.

From the research, cognitive load barriers form an integral part of procurement systems, documents, and processes and are not isolated to a specific part of procurement or a specific activity. Due to this, cognitive load was found to be frequent and directly impacted participation. Cognitive load barriers are explored in more detail below.

Cognitive Load

To understand cognitive barrier types, we need to think about cognitive load generally. Cognitive load is a term that refers to how much information the human mind is capable of processing at any given time. The less we put in front of someone, the more likely they are to understand it quickly and easily. The reverse is true: the more information and choices we put in front of someone, the more likely we are to confuse, delay, and create a scenario for misinterpretation and, ultimately, resentment and/or reluctance to participate.

During the interview phase, it came to light that individuals with cognitive disabilities and neurodivergence were particularly impacted by the amount and complexity of information that needed to be processed during, for example, the RFP process.

Simply put, we only have a certain amount of working memory to process information and tasks, especially when it comes to new experiences. Cognitive load theory, first described by John Sweller[13] that initially targeted instructional design, put forward a simple theory that cognitive load "identifies the conscious processes of thinking as working memory." Consequently, the more information or tasks we have in front of us, the more likely we are to have challenges processing that information or performing a task.

Our research identified a set of variables that amplify the negative effects of an increased cognitive load in procurement activities and documentation. We refer to this as a negative amplification of cognitive load.

- Complex procurement management technology commonly used by Canadian procurement organizations.
- Increased complexity and layers of complexity related to procurement tasks and processes.
- High complexity of documentation and density of language within procurement.

So, what did we find out about cognitive load theory when applied to procurement?

From the interviews, we know the following:

- Complexity was the most common accessibility barrier cited in corporate procurement, appearing in almost every system, task, document, and process—a common observation in all interviews related to cognitive barriers in different functions and areas of procurement.
- Cognitive load limits affect people with disabilities inside the organization as much as it impacts disabled-owned businesses. Interviews with internal buyers identified a moderate to high degree of complexity in systems, processes, and documentation.
- Due to the risk management nature of procurement and many rules around purchasing, communication also contained complex language, acronyms and terms further increasing cognitive load.

[13] Sweller et al., 1998

The result of the 3 factors above could lead to limiting participation and/or increasing frustration for people with disabilities relating to technology, documentation, and processes.

Source Barriers

One of the most important findings from the research was identifying, from the barrier categories described above, a class of barriers that drive the creation of all other barriers in procurement. Source barriers are named for their unique characteristics of being at the top of a barrier hierarchy (see below for barrier hierarchy) and being able to create widespread lesser barriers throughout all components of procurement.

Through interviews, we were able to identify the following:

- Source barriers are most often Organizational barriers. Still, they can also be Attitudinal barriers at times, often working in conjunction to create procurement-wide barriers.
- Source barriers are most often seen in 3 areas: policy, systems, and, to a certain degree, procurement processes. Policy was identified as a key area of source barriers.
- Source barriers often impact large parts or even the whole of procurement, where procurement is designed around them, making barrier remediation difficult, lengthy, and costly.

First, it is important to understand that barriers within procurement are almost always connected to each other and are almost always associated with a source barrier.

To illustrate this, we will use a policy as a source barrier at the top of the hierarchy. The policy we identified is commonly used and is best described as “Reduce the Number of Vendors in the Supply Chain.” From there, the technology system implements the policy through a series of processes, systematized checks and balances, forms/documents, and data. The policy actively creates an environment where it can control what happens underneath it which is then hardened by procurement systems that implement and institutionalize that policy including sub-policies, processes, forms/documents, and communications that are all connected back to that key policy.

The diagram below illustrates how a source barrier can affect other procurement components within the procurement system and create additional barriers. The diagram begins on the left with the policy described above. The next steps lead to what we refer as “hardening” which takes the policy and implements it as part of the operating function of procurement through procurement systems, other procurement policies, and sometimes procedures as well. The third stage is the Internal Buying Process where buyers use processes, policies, procedures, and systems that are aligned to the strategic policy objective of reducing the number of suppliers in the supply chain.

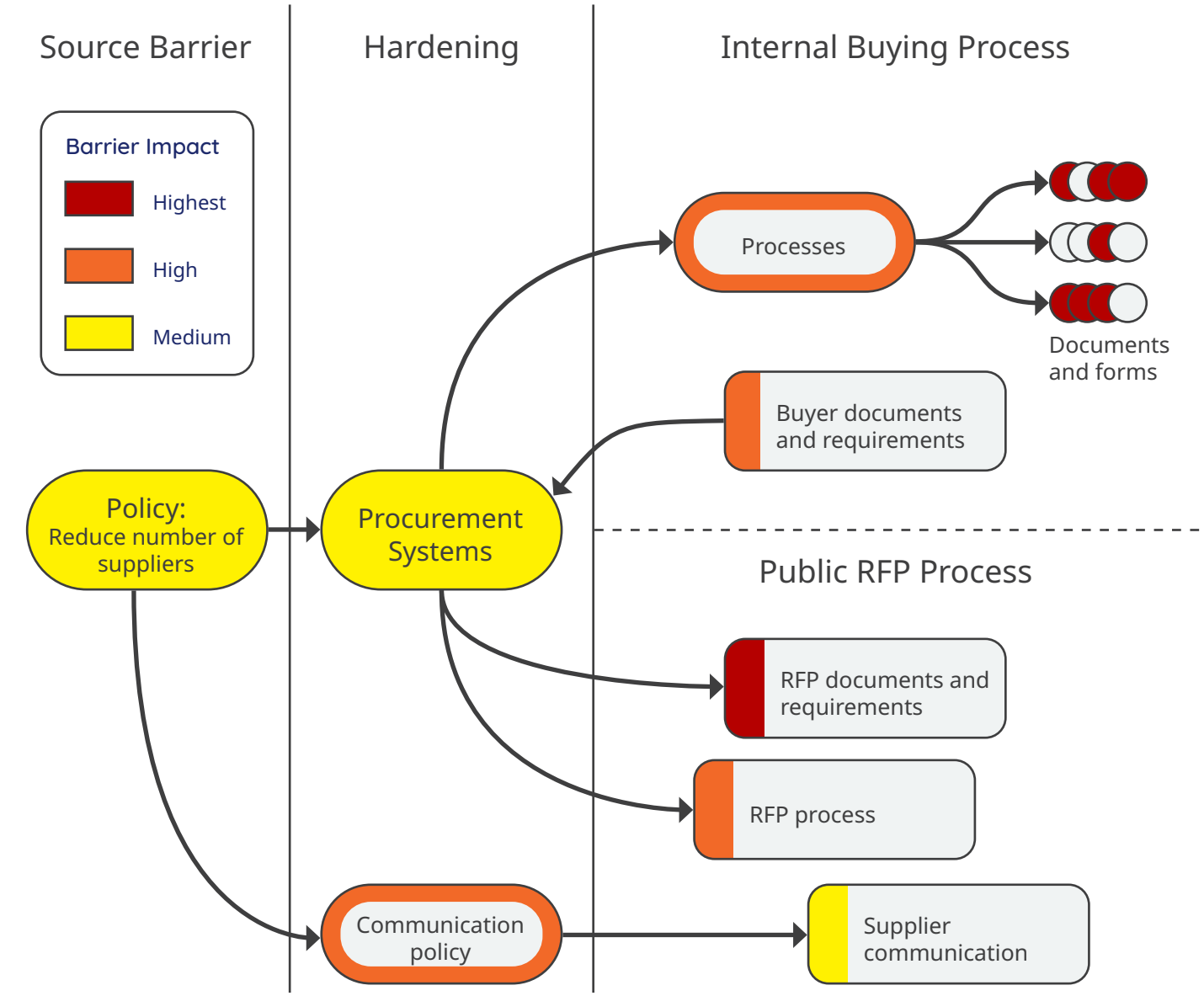


Figure 9. Source barrier impact on procurement.

From there, other barriers can emerge. An example of a prominent barrier identified in all corporate interviews which emanates from the illustrated policy is a preference to do business with large organizations which is a logical expected outcome of reducing suppliers in the supply chain. Large organizations are capable of meeting higher levels of risk management and generally have deeper financial pockets. They also tend to have more products, services, and capabilities to offer. The result is a direct impact on small suppliers where for a routine RFP process, more difficult sets of requirements are written, documentation is more complex, more resources are required to respond, and more onerous payment terms are in play, all of which create material barriers for smaller suppliers to participate. So, what begins as a traditional procurement policy (reduce risk and improve efficiency by reducing the number of suppliers to deal with) creates downstream barriers once the policy goes through the hardening process enroute to being implemented within the internal buying processes.

Barrier Hierarchy

An interesting set of observations from the research revolved around what can best be described as a hierarchy of specific types of barriers within procurement. To provide contrast, barriers in the built environment are generally independent of each other and could happen anywhere within a facility. Likewise, in technology systems, web pages, and documents, barriers to accessibility are seemingly random and independent of each other - more a matter of poor design standards and a lack of quality assurance. Both the built environment and Information Technology/ Information Systems (IT/IS) also benefit from legal codes and international standards that ensure a minimum level of accessibility.

This is not so with procurement and the barriers within its processes. Due to the rigid and structured nature of procurement and its primary directive of managing risk and compliance, everything within procurement must make sense, fill its role, and connect seamlessly within the structure, including barriers. Arguably, barriers define the very nature of procurement. It is a system of well-intentioned barriers that prevent bad actors, drive efficiency, and allow for proper governance. But it can also disproportionately impact people with disabilities involved in procurement by increasing the difficulty of tasks, communication, and documents at every turn. So, it is no surprise that when it comes to accessibility in procurement, understanding the relationship between barriers in the hierarchy from top to bottom is critical, as is the effect the barriers have on each other.

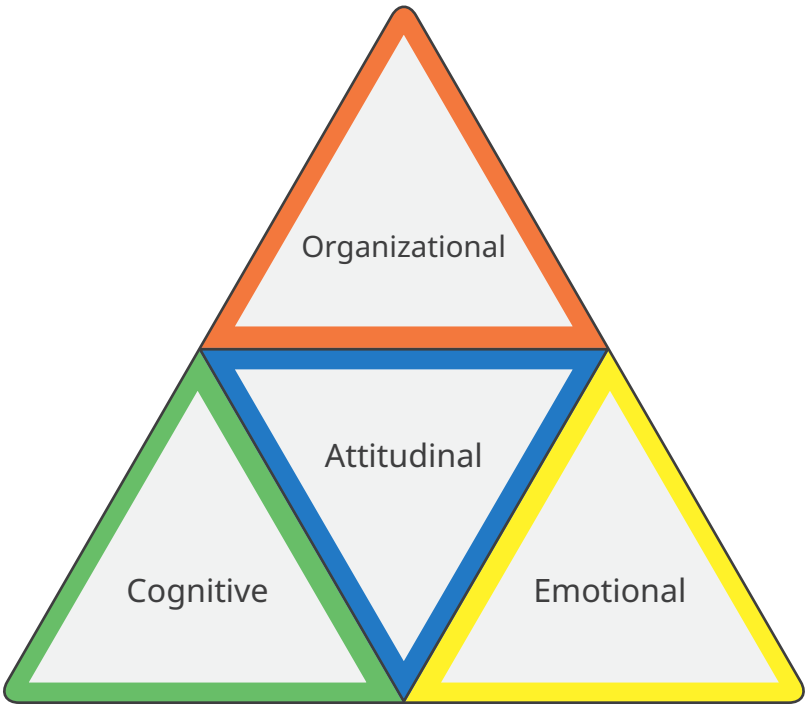


Figure 10. Types of barriers within procurement.

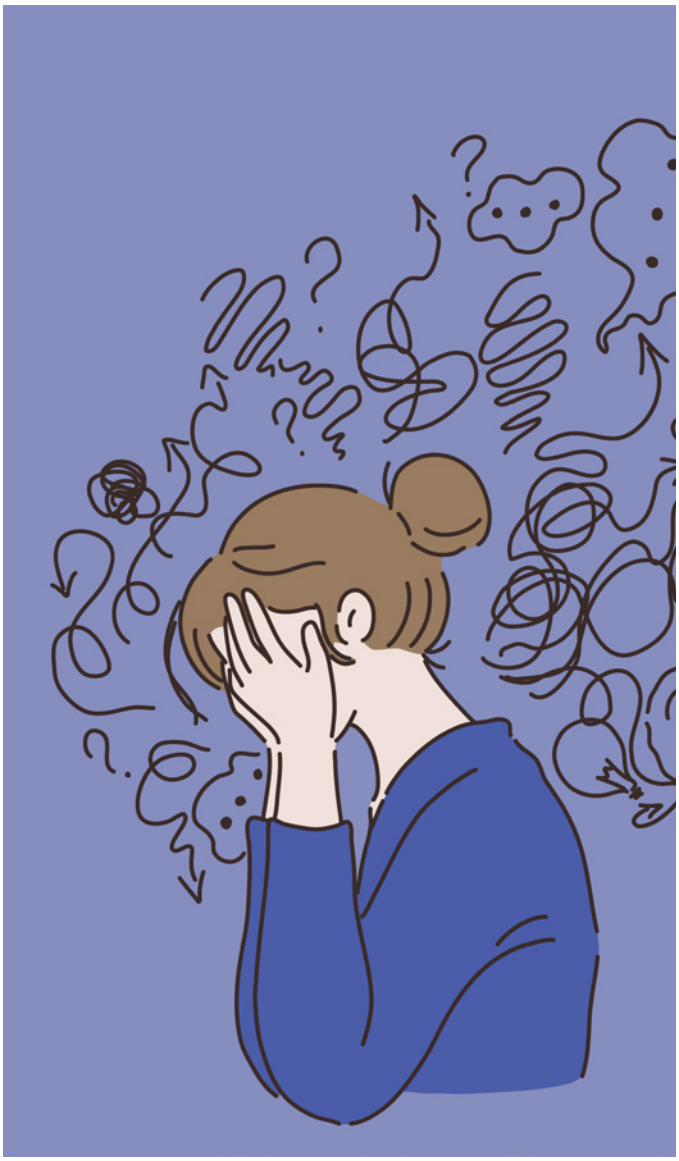
A hierarchy of barriers exists within corporate procurement where one barrier can create other barriers beneath it, leading to what we classify as a system of interdependent barriers. The barrier at the top, which creates these systems, has been named a source barrier. An example of a source barrier is a corporation's preference for large suppliers over small ones. This single barrier (which can be both attitudinal and organizational – see barrier duality below) creates a set of policies (organizational barriers) that spawn a system of processes, technology, documents, and communication that institutionalize barriers through every part of procurement. Further, we determined that other factors helped harden or increase resistance to change for the removal of barriers.

Barrier Duality

Certain barriers identified in the research could be classified as having the characteristics of 2 types of barriers such as attitudinal and organizational. As an example, from the interviews we were able to determine that the barrier "preference for large suppliers over small ones" could be both organizational (connected to a policy that makes it difficult for small suppliers and favours large) or an attitude in the form of a personal preference with an individual or group of individuals involved in the procurement process that can influence the outcome of a decision to a friendly incumbent.

Take large procurement systems as an example. Again, we go back to the point that these systems are designed to provide effective management of the supply chain while ensuring the implementation of financial and regulatory risk policies to meet compliance requirements. When these systems are implemented, they take existing policies for procurement and create a rigid system of management (processes, data, documents, communication) that makes it incredibly difficult to make changes without significant time and resources.

What was reinforced through the interviews with corporate procurement organizations is that these are well-established patterns in procurement with little variance from organization to organization. Many interviewees had decades of experience in procurement and with multiple organizations over their careers.



Because technology from some of our suppliers isn't necessarily accessible, we can't simply stop running the bank. Our ability to say, "accessibility is a must" is limited, and in many places, it becomes a "should." We take a risk-based approach to these issues and sometimes that "should" becomes a "must" and sometimes it becomes a "what's the best you've got." Not everything that we're going to get off the shelf is going to be accessible.

"Because technology from some of our suppliers isn't necessarily accessible, we can't simply stop running the bank. Our ability to say, 'accessibility is a must' is limited, and in many places, it becomes a 'should.' We take a risk-based approach to these issues and sometimes that 'should' becomes a 'must' and sometimes it becomes a 'what's the best you've got?' Not everything that we're going to get off the shelf is going to be accessible." ... "Processes aren't efficient and although a policy may include requirements for accessibility, the process to achieve that isn't understood."

- Head of Accessibility, Corporate

"I think the barriers are the same for small businesses. We make sure it's AODA compliant. I will say SAP Ariba is not compliant to AODA, it's compliant to US accessibility requirements. Canada seems like it's at the bottom of the list for these updates, so it's not fully accessible. We've requested it but it still isn't up to the Canadian standard. There are general barriers, and whenever you have a barrier, groups that are disenfranchised are going to find it harder than less disenfranchised people. They probably find the process difficult to navigate at times, but that would be any supplier, and small suppliers would find that hard."

- Purchasing Manager, Municipality

"We're very rule-bound, process becomes more complex, resulting in a fundamental lack of capacity to look at fundamental things."

- Manager of Policy and Program Planning, Crown Corporation

This feedback from corporate interviews tells us that while these are often hardened or institutionalized barriers, fixing commonly used procurement systems, for example, will affect positive change across industries. The most apparent common systems are represented by third-party software and platforms used by procurement such as MERX, a public procurement platform used by hundreds of public organizations for tendering public bids. If those third-party systems addressed barriers in accessibility within their systems, all users, corporate and supplier alike, would benefit.

Further, many processes and document sets within procurement were the same, leading the research team to assert that patterns are repeating not just in the procurement function in a single organization but across whole sectors such as banking or public-facing Crown corporations. Take, for example, the process of developing, publishing, and closing a public RFP. The internal processes for seeking budget approval and developing RFP documentation shared a high degree of similarity between other organizations.

Fortunately, because of the extent to which many of the technologies, processes, and documents are standardized and copied across organizations, thoughtfully removing barriers may and should allow the adoption and application of common solutions to whole sectors.

"We don’t know how to write our requirements. We’re notoriously not good at writing our requirements. That skill set is difficult, because of who we are and how procurement has evolved in the last few years, we weren’t part of trade agreements before. We would often have our vendors write requirements for us in the past."

- Sourcing Partner, Crown Corporation

"Procurers have a strong bias towards businesses they already understand, but oftentimes businesses run by people with disabilities don’t meet that mold and haven’t been given a chance. Procurers place disproportionate value on an antiquated way of doing things resulting in contradictory messages between, 'We care' and 'We’ll leave it up to someone else to figure out.' Disabled can be suppliers, not just consumers."

- Accessibility Consultant, Building Environment

An Accessible Procurement Case Study

The Public Request for Proposal (RFP) Process

To help put the findings in context and fully understand how barriers work in procurement, we applied our research insights to a standard public RFP process from beginning to end. This showed where barriers occur and what type of barriers they are, in relation to the 4 categories noted above (organizational, attitudinal, emotional, and cognitive). You will also understand the role of source barriers in creating a systemic ecosystem of barriers in procurement that touches on almost every task and interaction.

To begin with, it is important to understand the disabled-supplier mindset. Based on interviews with disabled suppliers, we identified key emotional barriers that happen before deciding on whether to respond to an RFP. Not enough data was captured to identify whether the same emotional responses were experienced by people with disabilities in procurement organizations who may have a role in developing and/or issuing the RFP.

Table 6: Emotional Responses Identified During the RFP Process

Emotional Responses Identified	The RFP Process	Winning bids	Losing bids	Delivery of goods and/or services	Payment
Relaxed, Content, Good, Happy, Excited	6	25	0	9	11
Satisfied, Accomplished, Fulfilled, Confident, Proud	1	10	0	30	7
Surprised, Shocked, Confused	9	4	10	1	4
Intimidated, Anxious, Overwhelmed, Afraid, Terrifie	17	5	9	4	7
Annoyed, Frustrated, Angry	13	0	19	1	4
Inadequate, Inequitable, Regret, Sad, Disappointed, Defeated, Depressed	7	1	11	7	0

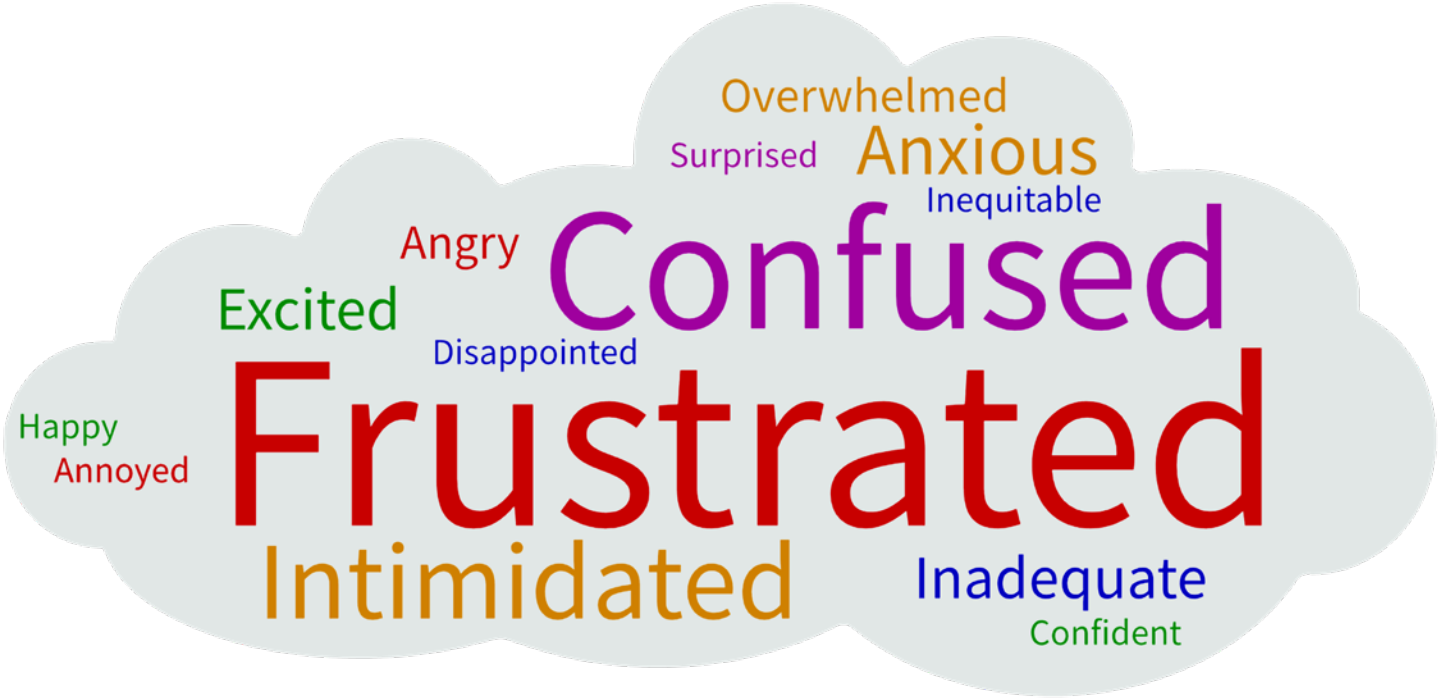


Figure 11. Word cloud identifying frequency of responses per emotion to the RFP process.

Further to the emotional response, disabled suppliers shared the following:

- There are pre-existing assumptions that small businesses do not have the capacity to work with large organizations.
- The procurement process can be lengthy and complex, and it can be difficult to understand/meet the requirements and complete the proposal in the requested timeline.
- A lack of transparency and open communication during that process can exacerbate the existing difficulties.

To fully understand the barriers within a public RFP process, we will first identify the 3 main stages of a public RFP process from beginning to end:

1. Business need, research, and development of the RFP.
2. Public RFP release, access, and response.
3. Award, onboarding, contracts, and delivering goods and services.

Frame of Reference

This case is based on interview results from the research project. This process is common but can vary in each step depending on the procurement organization's policies, processes and enabling technology.

3 roles are identified in the case study that conform to interviewee roles in their organizations:

1. **Buyer:**

   Represents departmental personnel who are involved in the purchase of goods/ services for their department. The buyer team is the internal client of procurement.

2. **Procurement Officer:**

   Represents an individual working directly in procurement in numerous roles including senior advisor, procurement manager and director.

3. **Supplier:**

   Represents the disabled-owned company involved as a respondent to the RFP.

Key Assumption: The third-party technology platform for the public RFP is MERX, a mandated platform for all public procurement over X value.

Stage 1 – Business Need, Research, and Development of the RFP Documents

Buyer Assessment

Key barrier:
Preference for incumbents/large suppliers.

Barrier type:
Organizational and Attitudinal

Who is Involved:
Internal buyer for a specific department within the organization. According to the research, most of the work is done without the involvement of procurement officers.

What happens in this step:
A buyer (or buyer team for large procurements) represents a departmental need to purchase a good or service. The buyer team is responsible for building a business case for management to gain funding for the procurement (a unique service or something not purchased often). The buyer may have an existing budget for the service as a regular item that they purchase (example: American Sign Language (ASL) Services).

How the barrier works:
The buyer may have a short list of companies they prefer to do business with or an incumbent offering a known suite of services matching the requirement (example: marketing agency). They will consciously or unconsciously favour one of these suppliers over finding an unproven supplier. The bid opportunity will most typically be made to select a group of suppliers with whom they are familiar.

Special characteristics of this barrier:
This source barrier reflects the company's offering a known suite of services matching the requirement.

Internal Approval

Key barrier:
Preference for incumbents/large suppliers.

Barrier type:
Organizational and Attitudinal

Who is Involved:
Internal buyer for specific department within the organization. According to the research, most of the work is done without the involvement of procurement officers.

What happens in this step:
The buyer seeks approval and presents management with a rationale for the need, timing, risks, budget estimates, and other particulars. Management reviews the procurement needs and approves the budget. This will include key requirements for the department to do business with the successful supplier.

How the barrier works:
The buyer presents a short list of companies they prefer as part of the business case to leadership including incumbent suppliers. They will consciously or unconsciously favour or prefer one of these suppliers over finding an unproven new (diverse/small) supplier. The case will be made most typically to select a group of suppliers with whom they are familiar.

Special characteristics of this barrier:
This source barrier reflects the company's strategy to reduce the overall supplier count and manage risk as well as suppliers with broader capability sets and resources.

Buyer Preparation

Key barrier:
Lack of awareness of diverse suppliers.

Barrier type:
Organizational

Who is Involved:
Internal buyers for specific departments within the organization and sometimes procurement advisors. At this point, buyers can avoid working with procurement personnel to identify potential suppliers. From the interviews, the involvement of procurement personnel was often viewed as something that could disrupt the buying teams' intentions to use specific suppliers., products or services. Therefore, according to the corporate interviews, it could lead to buyers trying to bypass or minimize the involvement of procurement staff in the preparation stage.

What happens in this step:
The buyer undertakes market research to identify specifics around the product or service they want to purchase. This will include possible vendors, specific product or service brands, and pricing research. A further action in this step is creating a buyer document package including specifications for the thing being procured, budgets, and some terms and conditions from the department (timing, delivery, and some procurement requirements).

How the barrier works:
The buyer is often uninterested in the time it takes to identify diverse suppliers or are unaware of diverse suppliers altogether. Further, they (buyers) often lack the tools and resources to easily find them (diverse suppliers) in the organization's databases. DEI offices which are often the custodians of the diverse supplier program, struggle to integrate that list into the formal procurement processes and systems. Further, the buyer can often exclude procurement from being involved in market research, fully excluding diverse suppliers from the opportunity.

Interestingly, data from the research suggests that involvement of diverse suppliers in small purchases (purchasing cards, restricted RFPs, sole source) represents the single largest opportunity for diverse suppliers to work with large organizations, as these purchases often involve services and goods that are easily delivered by small suppliers – marketing, training, consulting, etc.

Special characteristics of this barrier:
Speaks to a lack of communication and coordination between procurement and buyer team. This can be commonly attributed to a centralized DEI office that is difficult to access, lack of communication between departments, lack of coordination and inefficient tools as potential hurdles amongst other internal challenges.

RFP Preparation

Key barrier:
Lack of awareness of diverse suppliers.

Barrier type:
Cognitive

Who is Involved:
Internal buyer, procurement, and legal. Procurement is now directly involved in helping RFP templates and forms are difficult to use and understand.age with support from legal advisors.

What happens in this step:
The buyer must now use RFP templates created by procurement and legal departments within the corporation. The RFP templates and boilerplate contracts are designed to limit the organization's risk, meet regulatory/legislative compliance requirements, and ensure a fair and unbiased process. The templates are often accessed from internal systems, which could include ERP systems or company intranets.

How the barrier works:
For people with disabilities involved in this process step, the templates are often difficult to use and very complex. Often, the system hosting the templates can use forms that are not accessibly designed or do not allow for doing the work in stages, allowing work to be saved along the way.

Special characteristics of this barrier:
It affects the design of documents not only for technical accessibility but also for the complexity of the language and tasks involved in producing the RFP document package.

Stage 2 – Public RFP Access and Response

Tender Goes Live on Third-Party Platform

Key barrier:
Third-party paywall to access RFP documents.

Barrier type:
Organizational

Who is Involved:
Procurement now manages the process fully, separating the internal client and suppliers responding to the RFP.

What happens in this step:
The RFP is published using a third-party platform like MERX, which charges a fee to access the documents. A procurement manager sets up the public RFP post on MERX, adding documents, a summary, and a closing date. A summary of the RFP is publicly available without the fee. Still, the summary often lacks details to enable a decision to bid or pass on bidding.

How the barrier works:
Third-party platforms like MERX create a paywall to access public RFPs. The fee has varied over time but can be limiting for diverse suppliers who already struggle with cash flow and expenses. Further, due to the lack of detail in the free-to-view RFP summary, when disabled suppliers do pay to access the RFP documents, the RFP is often not applicable to them or has terms they cannot meet. This means the money they spent on accessing the RFP documents is now gone, and there is nothing to show for it.

Special characteristics of this barrier:
This barrier exists for several possible reasons including public procurement organizations are required to use MERX, a third-party technology platform, for any RFPS over $500,000. Other feedback from interviews suggested that third party platforms were easy for the procurement organization to use to reach the biggest possible market of suppliers. The research indicated that fees for accessing procurement opportunities are at the sole discretion of the third-party platforms.

Diverse Suppliers Find RFP

Key barrier:
Lack of awareness of procurement opportunities.

Barrier type:
Cognitive

Who is Involved:
Diverse suppliers and sometimes supplier diversity councils.

What happens in this step:
The diverse supplier finds the opportunity on the third-party platform and needs to decide whether to pay to access the documents to read detailed scope, requirements, etc.

How the barrier works:
The diverse supplier finds the public RFP through active searches and referrals from other sources like a supplier community, business network, or diversity council. The smaller diverse supplier does not have dedicated resources like large suppliers that are able to constantly identify and respond to numerous public RFPs. So, it is a question of choice for the diverse supplier and a risk of time and resources if they choose to reply, which limits their ability to pursue other, potentially more favourable business opportunities.

Special characteristics of this barrier:
This is one of the most common barriers to participation for small businesses in large procurement opportunities. Due to the extensive number of procurement platforms (third-party and within the organizations) amplified by the large volume of public RFPs available in the market, it is very difficult and time-consuming to identify what is relevant and what is not. Further, third-party platforms lack the technological ability to effectively personalize or narrow down the relevant procurement opportunities specific to a supplier. In other words, it's difficult to find relevant opportunities for small suppliers.

Diverse Suppliers Assess the RFP

Key barrier:
Requirements are too strict/tough or do not match the procurement level.

Barrier type:
Organizational

Who is Involved:
Diverse suppliers, internal buyer, and procurement. While the diverse supplier is responsible for the decision to respond, the internal buyer and procurement set the requirements that may limit or prevent participation.

What happens in this step:
The diverse supplier has decided to pay for access to the complete set of RFP documents to review and then decide whether to develop a proposal in response. The RFP document set is extensive and includes rules governing the procurement, the proposal, requirements, scope of work, schedules and templates, terms and conditions, and a sample legal contract. Based on the research, this is a typical package of RFP documents.

How the barrier works:
While there are numerous other barriers in RFP document packages, this specific case study is focused on the mandatory requirements the supplier must meet to do business with the procuring organization. A key insight from the research identified that requirements are often applied as a blanket set of general requirements and are not associated with the level or value of procurement. Further, this generic set of requirements is based on large procurement contracts with large suppliers and is not aligned with doing business with small suppliers.

Examples of requirements are:

- Security clearances that take months to secure and often require that a "sponsoring" company must be in place at the time of proposal submission.
- Liability insurance coverage far beyond what is required for the level or value of procurement.
- Unrealistic number of references or years of experience in the bidding company doing very similar things for a narrow band of clients (example: a specific federal government department).

In addition, our interviews revealed that the ability for bidders to ask questions is often very frustrating and unhelpful, as the procurement manager's answer is often very generic or points back to the RFP documents which may in turn be confusing matters. A lack of accessible alternatives for feedback and communication can compound this barrier.

Special characteristics of this barrier:
Requirements for doing business with a supplier is one of the few barriers that is relatively easy to remediate by ensuring the requirements match the level of procurement. This could increase participation of diverse suppliers in lower-risk procurement opportunities.

Application – Proposal Submission by Diverse Supplier

Key barrier:
Poor to no transparency/communication in the decision-making process.

Barrier type:
Emotional

Who is Involved:
Diverse supplier and procurement manager. Often, there is no human contact, and the application process/proposal submission relies entirely on the procurement technology/platform.

What happens in this step:
The diverse supplier uploads a proposal and supporting documentation into the procurement system. The system creates an automated message to acknowledge the submission. After this, the diverse supplier waits until a decision is made to either disqualify them for not meeting mandatory or other requirements, possibly receive a request for further information, announce a winner, or announce a hold/cancellation of the procurement opportunity.

How the barrier works:
From the research, it seems to be standard policy to not communicate at all with suppliers during this decision-making process. The deadlines for decisions are often pushed out, or the procurement gets put on hold without communicating this to the diverse supplier. No progress reports are issued to help suppliers consider forward planning or to keep the prospective project delivery team intact. This barrier creates a sustained negative emotional response in the diverse supplier who sacrificed time and resources to respond to this opportunity. On its face, it lacks humanity, disrespects the people who have invested in responding, and ignores the cost of holding project delivery teams together awaiting an answer. Over time, this barrier can have a cumulative effect on driving down the participation of diverse suppliers as they do not believe the opportunities are real or worth the time. A lack of accessible communication/feedback methods can compound this.

Special characteristics of this barrier:
This is a uniquely human barrier based on one party's lack of communication or openness of the process. It can border on disrespect when a procuring organization cancels, delays, or changes a procurement opportunity.

Proposal Assessment

Key barrier:
Evaluation/scoring methodology is difficult to understand.

Barrier type:
Cognitive

Who is Involved:
Internal buyer team and procurement. Procurement works with the buyer team to assess and review all proposals with the final activity of applying the scoring methodology to each proposal. For larger, more complex projects, entire evaluation teams may be assembled.

What happens in this step:
According to interviews with both procurement teams and internal buyers, evaluation/scoring methodologies are complex and confusing. The review of the proposals was seen as relatively straightforward otherwise.

How the barrier works:
The complexity of evaluation and scoring methodology is a common barrier for internal client teams. Further, this barrier negatively impacts disabled-owned suppliers trying to understand how to craft proposals that enable the best score.

Special characteristics of this barrier:
The evaluation or scoring methodology is commonly seen as one of the most confusing or difficult processes to understand in procurement. It often involves complex formulas for scoring based on several factors to reach logical outcomes for final evaluation, particularly concerning the pricing or costing models. The ability to fully understand the process, how to use it to best showcase your company's capabilities, and what the results mean are critical to meaningful participation by people with disabilities inside the organization.

Stage 3 – Onboarding, Contracts and Delivering Goods/Services

Buyer Decision

Key barrier:
Preference for large/incumbent suppliers.

Barrier type:
Attitudinal

Who is Involved:
Based on the evaluation results, the buyer team makes a final decision to select a supplier to fulfill the procurement request.

What happens in this step:
According to interviews with both procurement teams and internal buyers, evaluation/scoring methodologies are complex and confusing. The review of the proposals was seen as relatively straightforward otherwise.

How the barrier works:
As at the beginning of the RFP cycle, where the buyer team undertakes to build a business case and do market research, a preference for large and/or incumbent suppliers comes into play in this critical step. From the interviews, it is a point where a buyer needs not only the logical arguments to select the winner but also the emotional argument – Do I feel comfortable working with this supplier? Do I trust that they can do the job to my standards?

Special characteristics of this barrier:
This source barrier reflects the company's strategy to reduce the overall supplier count and manage risk.

Supplier Onboarding

Key barrier:
The registration and onboarding process is difficult.

Barrier type:
Cognitive

Who is Involved:
Suppliers, procurement manager and internal buyers.

What happens in this step:
The supplier is asked to register as a supplier with the procuring organization and review and sign contracts, confidentiality agreements and schedules. The registration typically happens through a portal using forms that are part of an internal system in the procuring organization.

How the barrier works:
The barrier here is a combination of cognitive load and processes/forms that are not accessible. According to research interviews, the supplier usually receives some assistance from the procurement manager on certain tasks, but this is accommodation-based. This is a necessary set of actions to begin doing business together.

Special characteristics of this barrier:
This barrier is based on cognitive load in a series of tasks and can also include systems (forms and processes) that are not accessibly designed. Most onboarding processes use internal systems to register the new supplier, which crosses over into Information and Communications Technology (ICT) accessibility as well.

Invoicing and Payment

Key barrier:
Payment terms are difficult.

Barrier type:
Organizational (and Emotional)

Who is Involved:
Suppliers, procurement, internal buyers, finance, and administration.

What happens in this step:
The supplier either invoices for the total delivery amount or for partial payment based on achieving set milestones. The invoice is based on a purchase order number (PO#) assigned at the start of the contract. That PO# links the invoices to the contract and the supplier to ensure the correct amount is paid to the correct party.

How the barrier works:
Most large procurement organizations have payment terms aligned to doing business with large vendors with deep pockets that can absorb extended periods of not being paid to service ongoing contracts or sales. Several aspects of this barrier come together to make working with large procurement organizations difficult for diverse suppliers.

- Payment timing is based on 30 or 60 days from the invoice date. The research identified that it is more of a guideline than a rule, and many companies extend payment well beyond these dates. Likewise, if a supplier is persistent enough, earlier payment may be negotiated but the time and effort to do so also presents an unreasonable cost.
- There is a lack of transparency regarding payment progress. The purchasing organization typically does not clearly indicate payment progress or where the invoice is in the payment cycle.
- Lack of communication when inquiring about the status of payments is often cited by suppliers.

Special characteristics of this barrier:
Often, this stage and set of barriers is linked back to doing business with large suppliers who can tolerate longer pay cycles, more complex payment processes, and have the resources to commit to pursuing communications and payment. Further, smaller suppliers often lack the personal relationships large suppliers can create with large procurement organizations, making communication and issue resolution more difficult.

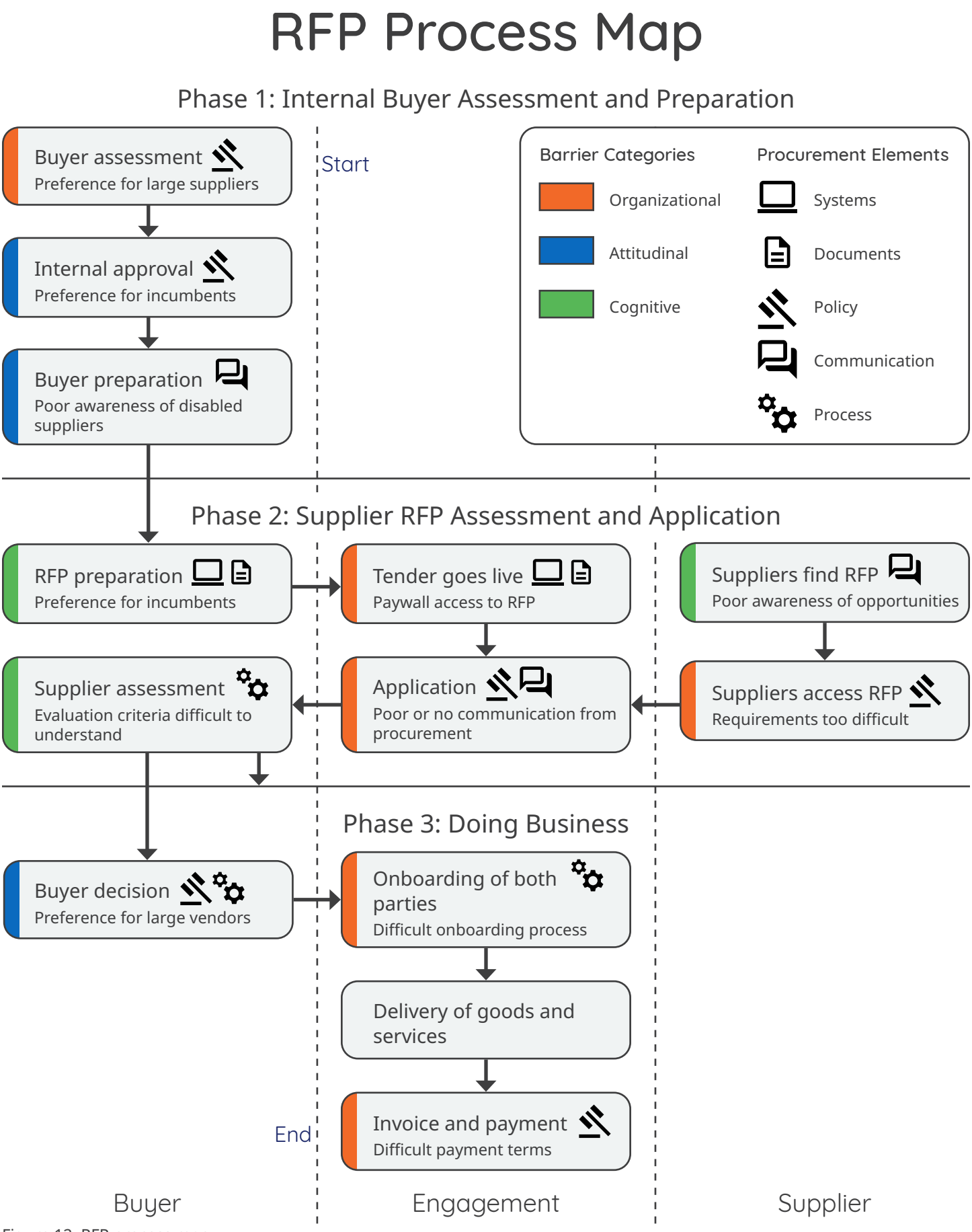


Figure 12. RFP process map.

Key Learnings

The case study lays out a generic and recognizable process about the creation, management, and closing of a public RFP. Likewise, the roles of all stakeholders in the process are generally common or uniform within a public RFP.

Through the research, we identified key barriers in each step experienced by multiple sets of stakeholders within and outside the procurement organization. It is important to note that this preceding case study only included one barrier at each step. In contrast, multiple barriers could be experienced at each step in the research.

The impact on diverse suppliers is evident – public RFP processes can prevent or limit the participation of people with disabilities. These barriers are part of an interconnected system of barriers that is typically based on key (source) barriers at the top of the barrier hierarchy, such as the organizational barrier of the preference to do business with large suppliers.



Table 7: Barriers and Procurement Elements Present in RFP Process			
Procurement Step	**Barrier**	**Barrier Type**	**Procurement Element**
Buyer assessment	Preference for large suppliers	Organizational	Policy
Internal approval	Preference for incumbents	Attitudinal	Policy
Buyer preparation	Poor awareness of disabled suppliers	Attitudinal	Communication
RFP preparation	RFP templates difficult to use	Cognitive	Systems, Docs
Tender goes live	Paywall to access RFP	Paywall to access RFP	Systems, Docs
Suppliers find RFP	Poor awareness of opportunities	Cognitive	Communication
Suppliers assess RFP	Requirements too difficult	Organizational	Policy
Application	Poor or no communication from procurement	Organizational	Policy, Communication
Supplier assessment	Evaluation criteria difficult to understand	Cognitive	Process
Buyer decision	Preference for large vendors	Attitudinal	Policy, Process
Delivery of goods and services	N/A	N/A	N/A
Invoice and payment	Difficult payment terms	Organizational	Policy

Where Do We Go From Here?

The Situation Facing Procurement Organizations and Disabled-Owned Suppliers

Well Designed Remedies May Help Many Organizations

Across organizations, barriers in procurement activate in set patterns. Through the research, we identified that these patterns are repeated with little variation between organizations and industries. The structure of procurement (policy, technology, documentation, processes, communications, regulation) shares common features, regardless of industry. So, when we look at remediation of barriers, it is possible that one well-defined solution may fix problems across many organizations.

An example of this kind of cross-industry barrier in procurement is to look at something like RFP documentation which is often confusing or too complex. A potential remedy is to mandate a plain language approach to writing an RFP that can either apply to the entirety of the RFP documentation or provide a plain language overview of the procurement opportunity (scope, instructions, timing, requirements, terms). The effort to remedy this barrier using the latter approach is relatively minor, but delivers a high yield for people with disabilities, and could easily be rolled out as a policy. Further, this approach should be affordable for most organizations to implement using the referenceable Plain Language Standard from ACA and internal resources to deliver on it.

What is structurally common in procurement?

- Legislative and regulatory compliance
- Technology
- Processes
- Document types and structure
- Policy
- Reporting

What is unique or varies in procurement?

The variance between procurement organizations most often occurs in implementing the above common structural elements of procurement. From organization to organization, the implementation of policy is the key driver of variance. From the research, we know that different organizations identified different procurement vehicles: sole source, invitation to bid (with a minimum number of bidders) and public RFP, based on value, complexity, political sensitivity, and risk. While these procurement vehicles and criteria are common, the dollar amount of each category fluctuated from organization to organization based on different policy decisions.

Example: Policy difference in dollar thresholds of procurement levels:

Organization 1

- Sole source - less than $5,000
- Invitation to bid – less than $100,000
- Public R FP – over $100,000

Organization 2

- Sole source – less than $100,000
- Invitation to bid - $100,000 to $600,000
- Public RFP – over $600,000

The difference in policy between dollar threshold procurement levels also leads to a potentially unique set of barriers. The chosen procurement level (or instrument) generates more or less onerous requirements, processes (internal and external), and documentation depending on perceived financial risk to the organization. An RFP process will generally be much more onerous and contain many barriers to entry (cost to bid, insurance requirements, financial risk requirements, etc.), which limit access for smaller companies. At the same time, organizations that are prepared to attach higher dollar value to less onerous processes may have greater willingness to take/manage risk and consequently open their bid opportunities to smaller companies, including diverse suppliers. It was unclear from the research whether standardized risk acceptance/ avoidance methodologies were driving dollar threshold policy or whether it was simply a subjective organizational decision.

While it certainly bears more research to determine whether fixes that target source barriers are highly repeatable due to procurement technology, policy and resourcing, a key finding is that a systematic approach can be developed to remediate barriers across industries like the public sector.

In other words, if you remediate one barrier for one Crown corporation, remediation can likely be duplicated for every other Crown and government department without much deviation in the prescribed remedy. This allows for a measured approach that allows for cost control as well. The development of a procurement standard by Accessible Standards Canada could be a primary vehicle for cross-industry remedies. The risk of a standard is the cost of implementation of such remedies, which needs to be balanced with an appropriate amount of time to make the change while ensuring that change happens in a meaningful timeframe.

A key challenge will be to ensure the procurement standard itself does not become a barrier to progress by creating an unreasonable timetable for adoption that drives up the costs of remediation, makes resources scarce and increase the likelihood of failed implementation. Removing barriers and driving towards accessible, and hopefully inclusive, procurement is critical to organizations making positive progress removing barriers. This change will take time.



Procurement organizations must be given time to research, plan, resource, and execute plans at a level to allow reasonable progress on remediation that meets public expectations while balancing the organizations need for affordability. Given the complexity of most procurement organizations, we anticipate this is a long-term effort spanning years and involving key partners such as technology providers who hold an immense amount of influence over barrier remediation in core technology systems.

Issues in Remediation of Barriers in Procurement

It is the opinion of the research team that remediation of barriers is not a straightforward exercise to undertake for most barriers. While some barriers can be directly dealt with through modest policy changes or adjustments (example: dollar value thresholds for procurement vehicles), the vast majority will require research, strategic thinking, and a well-formulated plan to remediate. This is due in no small way to the complex interconnection of barriers in procurement and the presence of source barriers.

As noted above, barriers in procurement spread from a single source barrier to influence sub-policies, processes, documents, systems, and communication down the line. If we only treat a process under a source barrier, it is like treating a symptom and not the cause itself, rendering the remedy ineffective.



Who is Accountable for Accessible Procurement?

Accountability is the key to successful change in making procurement more accessible and lies with all stakeholders, including diverse suppliers.

Organizational Accountability:

Organizations are directly responsible for ensuring their procurement technology, policies, processes, documents, and communications are accessible. This effort can only be achieved over time so prioritization must be given to removing or minimizing barriers that prevent participation and then moving onto restrictive barriers.

Diverse Supplier Council Accountability:

Diversity Councils are responsible for supporting the diverse supplier communities and working to open new opportunities to advance supplier knowledge, understanding, and access to appropriate, fair, and equitable procurement opportunities.

Diverse (Disabled-Owned) Supplier Accountability:

Disabled-owned businesses and other diverse suppliers are accountable for preparing themselves to do business with large procurement organizations and the government. This means not only understanding the various purchasing vehicles and processes but also the minimum requirements for procurement, such as liability insurance and an HST number that large organizations will require of them.

Government Accountability:

Government needs to both enable the success of the parties (all parties) and monitor progress to hold various stakeholders accountable. This means developing more than a standard to govern accessible procurement in Canada but also being willing to develop and fund programs and tools for businesses to succeed in this new area of corporate accessibility. Specific to diverse supplier programs (disabled-owned and others), the Government must be prepared to monitor the effectiveness of these programs including tracking contracts awarded and total spend.

Canadian Procurement Organizations Will Need Support and Guidance

Making a shift towards accessible procurement is complex and will take planning, time, and proper resourcing. However, ASC Accessible Procurement Standards Technical Committee is already developing the standard for Procurement of Goods, Services, and Facilities and therefore, this is not something federally regulated organizations can sit still on. Any standard will mandate significant changes to technology, processes, policy, communications and buying requirements. The most significant issue we face in moving towards accessible procurement is that, unlike other areas of accessibility like employment, ICT and built environment, no knowledge, tools, or service providers currently exist to help plan and execute initiatives aimed at addressing the accessibility of procurement.

Given that these federally regulated organizations rely heavily on internal and external systems to manage procurement, questions legitimately remain as to whether these systems providers can respond in a meaningful amount of time to modify technology platforms to meet the emerging needs of accessible procurement?

So, what can procurement organizations do to prepare for the upcoming standard?

- Form a working group internally and within their industry to discuss the state of their procurement.
- Do research to understand their own procurement standards and how they can be limiting to people with disabilities.
- Speak with technology providers to understand their path to implementing new ICT standards for accessibility and how that will impact the organization's procurement systems.
- Speak with internal and external stakeholders to understand the specific needs of people with disabilities.
- Plan to allocate resources early to give organizations a solid footing for a remediation strategy. This will require people and funding.



Do Procurement Staff and Buyers Understand Accessibility Criteria?

A key area of need – understanding and building in accessibility criteria to procurement vehicles – was identified in the research project, though it was outside the scope of this report. To buy accessible goods, services and facilities, a buyer or procurement organization not only has to ensure the procurement experience is accessible, but also that what they are buying is accessibly designed.

The research project found that very little knowledge was available inside organizations regarding how to develop accessible criteria – and very few options outside the organization either. The lack of clarity on how to build in accessible design to procurement requirements presents a clear barrier to progress, even if procurement organizations embraced a procurement experience that is accessible and eventually inclusive. Further research and guidance are required in this area as this will be one of the keys to long term success in realizing accessible procurement or risk a continuation of "business as usual."

Connection to Other ACA Standards

A key takeaway from the research was how deeply procurement is integrated into the organization. Procurement, as a corporate function, impacts all other areas of the business including ultimately the organization's ability to deliver accessible goods, services, and facilities to the public. It is then no surprise that accessible procurement will intersect with other ACA standards as procurement is the mechanism by which all departments procure their goods and services.

This realization leads to several unresolved questions and further lines of enquiry to pursue:

- What standards intersect and where?
- How do the standards impact each other?
- Does the intersection of standards create new barriers that have yet to be identified?
- What is the hierarchy of standards where there is a conflict?

Accessible Procurement is Business Transformation

If there is one thing to take away from this report, it is the following:

Procurement is hardened and highly resistant to change by design. The change necessary to allow the meaningful participation of people with disabilities inside and outside the organization will require significant internal (executive level) support and resourcing, it will require time to plan, design and implement across the enterprise and will require coordination with efforts of other ACA initiatives inside the organization.

Shifting from the current state to one where accessible procurement is the norm will be a significant and complex undertaking. Our research concluded that the degree of resistance to change within organizations is high, particularly due to procurement's risk/regulatory compliance nature. This risk/compliance characteristic of procurement has created a high degree of cultural resistance to change due to fear of compromising the organization in some way. It is an emotional minefield for many procurement professionals and their internal clients that, according to research interviews, has people thinking, "We avoid change because change is not good in procurement. The risk is too great of something bad happening for not following the rules."

While it may be debatable that the only way to achieve accessible procurement is by "not following the rules," organizational risk avoidance is a powerful barrier to change.

What We Still Don't Know About Procurement and Accessibility

More research needs to be done to understand areas touched on in the research but not included in the project focus. This includes:

Barrier Remediation:

While the research findings identified some focused remediation for barriers like complex language in documents, a barrier well understood by procurement organizations, most barriers identified were complex and interconnected with each other. Fortunately, because of the extent to which many of the technologies, processes, and documents are standardized and copied across organizations, thoughtfully removing barriers may and should allow the adoption and application of common solutions.

Procurement Vehicles (Methods):

The research looked specifically at the public RFP process as this is the most referenced procurement activity for both procurement organizations and disabled suppliers. The research did not look at other procurement vehicles such as invitation to bid, sole sourcing, and other strategic transaction types including standing offers and master contracts. However, these less onerous, less risky procurement vehicles may provide opportunities for procurement organizations to experiment with strategies and tactics to address barriers.

The Impact of Tier 1 Suppliers:

Master contract and standing offer holders came up numerous times in the research project but were not part of the focus of the research. The role these organizations play in procurement and supplier diversity is pivotal to the operation of all large procurement organizations. What we do know from the research is that, notwithstanding that very large amounts of purchasing dollars flow through Tier 1 suppliers, little is done to push accountability for accessibility and supplier diversity down to them. Further, indirect spend on supplier diversity is typically not tracked at this level.

Accessibility Criteria:

As noted above, the research project focused on barriers within procurement organizations, not the purchase of accessibly designed goods, services, and facilities. This area represents a large blind spot for most organizations and greater attention and thought is required to address this barrier area.

Regulatory and Trade Agreements:

Procurement, particularly public sector, is subject to trade agreements and regulatory requirements. While the research data touched on this subject, its importance and impact on accessible procurement are not understood. Where the 2 conflict, what has priority?

Organizational Change:

Accessible procurement affects every aspect of an organization, bringing substantial changes to culture, systems, policies, and processes. While the research project identified key aspects requiring adjustment to achieve accessible procurement, the path to implementing these changes, like any big organizational change, is complex and challenging.

Intersectionality:

For this report, intersectionality refers to how the ACA standards intersect and affect each other. We know that an accessible procurement standard will affect the ICT standard, employment standard, and the built environment standard, to name a few. What remains to be researched is how and where these standards intersect and how they affect each other, particularly considering the requirement to buy goods, services, and facilities that are accessibly designed.

Why Organizations Need to Take Accessible Procurement Seriously

As a final takeaway, doing accessibility well – including in procurement – has a powerful and positive influence on the experiences of employees, customers, and the public. In that light, large procurement organizations should consider some key questions:

- Should we invest in research and planning to better understand our procurement organization, practices, and supplier diversity programs?
- What are the costs of change in terms of time, people, and financial resources?
- Are there capabilities of our partners that we can leverage to save time and resources?
- What is our organization's commitment to supporting supplier diversity and how do we effectively activate against that?
- How do other accessibility standards intersect with accessible procurement?
- How might answers to these questions reshape our culture, resources, and strategic planning?

Accessible procurement, much like other areas of accessibility, is a long but necessary journey if it is to benefit all stakeholders. However, unlike other standards, accessible procurement lacks established, practical guidance and experience, making proper planning essential to mitigate the risk of change across an important part of the organization, potentially impacting the broader economy.

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