

LEADS Framework for Disability Inclusion

A Bottom-Up, Employee-Centered Assessment Framework

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Executive Summary

Existing corporate disability inclusion assessments primarily rely on having organizations and company leadership evaluate their own policies, practices, and accommodations. Research consistently shows that this top-down approach overstates disability inclusion outcomes relative to the actual experiences of employees with disabilities, in part because most individuals choose not to disclose their disability status to employers (Boston Consulting Group [BCG], 2023; Colella, 1996; Sherbin et al., 2017). In addition, many top-down assessments involve financial costs for organizations and require external parties or consultants to administer. The LEADS Framework for Disability Inclusion or 'LEADS' addresses this assessment gap by providing an open-access, standardized, and bottom-up, employee-centered disability inclusion framework that supplements existing organizational self-assessments with employee experiences. LEADS is designed to be answered by all employees regardless of disability status and administered by employees, Employee Resource Groups (ERGs), and inclusion leaders.

The framework's 40 questions are split across five domains: Leadership Support (L), Equity in Opportunity (E), Accommodation Adequacy (A), Disclosure and Dignity (D), and Systemic and Cultural Inclusion (S). In addition, there are 10 demographic questions for subgroup analysis which are to be included at the end of the assessment. Responses are scored on a five-point Likert scale or converted from Yes/No percentages into an equivalent five-point score. LEADS is grounded in Canadian federal disability policy, including the Canadian Human Rights Act, the Accessible Canada Act, and the Employment Equity Act, U.S. disability employment law, including the Americans with Disabilities Act and Section 503 of the Rehabilitation Act, and supplementary international standards, including the International Labour Organization's Convention No. 159 and the United Nations Convention on the Rights of Persons with Disabilities.

An implementation guide, survey and domain scorecard template, and regional adaptation guidance for Latin America, Europe, and the Asia-Pacific region are included. Formal psychometric validation, including exploratory factor analysis, confirmatory factor analysis, test-retest reliability, and convergent validity testing will follow multiple pilot organization implementations. Organizations and researchers who compile results based on LEADS are strongly encouraged to share aggregate findings and feedback to support this process.

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1. Context and Rationale

Across Canada and the United States (U.S.), persons with disabilities (PWD) are significantly underrepresented in the workplace and continue to face disproportionate barriers to work and employment (World Health Organization & World Bank, 2011; WHO, 2022). In 2022, more than one in four (27%) Canadians aged 15 or older identified as having one or more disabilities, representing a total of nearly 8 million people (Statistics Canada, 2024a). Despite this pervasiveness, the employment rate for PWDs aged 15 or older in Canada was 46.4% in 2024, compared to 66.2% for persons without disabilities (Statistics Canada, 2025a). Similarly, in the U.S., the employment-population ratio for people with a disability aged 16 or older was 22.7% in 2024, compared to 65.5% for people with no disability (U.S. Bureau of Labor Statistics, 2025).

In Canada, nearly seven in ten (69%) employed PWDs aged 15 or older experienced at least one barrier to accessibility in the workplace in 2024, with more than one-third (35.4%) reporting unmet needs for workplace accommodations in 2022 (Statistics Canada, 2024b; Statistics Canada, 2025b). Among PWDs aged 15 or older, nearly seven in ten (68%) experienced a barrier to accessibility during a hiring process or a barrier that discouraged or prevented them from working or seeking work, with the most cited barrier (54%) being difficulty disclosing their disability to their potential employer (Statistics Canada, 2025b). These findings raise an important question: Why does workplace inequality persist for PWDs, even in regions such as Canada and the U.S. which have relatively well-developed disability policy frameworks? Research into this topic has consistently shown that legal compliance alone is insufficient, and that organizations and managers play a key role in translating disability inclusion commitments into day-to-day experiences for employees with disabilities (Schur et al., 2005; Bonaccio et al., 2020).

The numbers above represent millions of employees with disabilities across Canada and the U.S. who often lack adequate support and a platform to share their experiences with their employers. LEADS emerged to provide employees, ERGs, and inclusion leaders with a practical, autonomous, and employee-centered disability inclusion framework that amplifies employee voices in ways that top-down organizational assessments cannot.

2. Landscape of Existing Assessment Frameworks

There is a growing ecosystem of disability inclusion assessment frameworks that has led to meaningful progress and measurable improvements in corporate disability inclusion. However, most of these assessments work from the top-down, meaning that they rely on organizations and company leadership to assess their own policies, practices, and accommodations. They do not directly ask employees with disabilities about their lived experience with disability inclusion during day-to-day work. The table below provides a summary of some of the prominent frameworks in this space and their design principles:

Framework / tool	Assessment approach	What it measures	Key limitation / Design note
Disability Smart Self-Assessment (Business Disability Forum)	Top-down (employer)	Leadership, learning and development, workplace adjustments, recruitment, retention, customers and service users, procurement, communication, built environment, and technology.	Employer self-assessment; lack of employee voice.
Disability Index, formerly referred to as the "Disability Equality Index" (Disability:IN) ¹	Top-down (employer)	Policies, practices, and outcomes across key areas such as leadership, accessibility, recruitment, benefits, supply chain, accommodations, and marketing/communications.	Employer self-assessment; lack of employee voice.
ERG/BRG Maturity Model (Disability:IN)	ERG (organizational)	Progress, engagement, and ROI of disability-focused ERGs throughout maturity stages (Foundational, Formalized, Operational, Integrated, and Dynamic).	Assesses ERG effectiveness, not individual employee experience.
BenchmarkABILITY (Cornell University ILR School)	Top-down (employer)	Disability policies and practices across recruitment/hiring, career development/retention, accessibility/accommodation, compensation/benefits, workplace disability support, and metrics/analytics.	Employer self-assessment; lack of employee voice.
Disability Inclusion Gap Analysis (AbilityNet)	Employer / consultancy-led	Four level rating across culture, recruitment, onboarding, collaborative working, meetings/events, performance/career development, and customer services.	External inclusion assessment; not deployable independently by organizations or ERGs.
Inclusive Employer Toolbox (Humanity & Inclusion HI)	Employer / consultancy-led	Five dimensions of an inclusive company: policies/leadership, HR/management, internal culture, accessibility, and partnerships.	External inclusion assessment; not deployable independently by organizations or ERGs.
Disability Inclusion Workplace Assessment (Understood)	Employer / consultancy-led	Full employee life cycle including policies, processes, and practices related to recruiting, hiring, and onboarding.	External inclusion assessment; not deployable independently by organizations or ERGs.
Disability Inclusion Blueprint, formerly referred to as the "Disability Employment Tracker" (National Organization on Disability)	Top-down (employer)	Strategy, talent sourcing and outcomes, climate and culture, people practices, and workplace tools and accessibility.	Employer self-assessment; lack of employee voice.
Disability Confident scheme (Department for Work and Pensions, UK)	Top-down (employer)	Recruitment, retention, and development of PWDs, across three scheme levels: Committed, Employer, and Leader.	Employer self-assessment; lack of employee voice.

¹ The Disability Index (formerly referred to as the "Disability Equality Index" by Disability:IN) was internationalized in 2024 to include Brazil, Canada, Germany, India, Japan, the Philippines, and the United Kingdom. The table's overview of the assessment's primary purpose and design is unaffected.

Framework / tool	Assessment approach	What it measures	Key limitation / Design note
LEADS Framework for Disability Inclusion (this document)	Bottom-up (employee-centered)	Whether employees with disabilities feel supported by their leaders, teams, and organization across five domains: Leadership Support (L), Equity in Opportunity (E), Accommodation Adequacy (A), Disclosure and Dignity (D), and Systemic and Cultural Inclusion (S).	Designed to supplement existing tools by giving a voice to employees with disabilities.

In their ‘Disability Inclusion Workplace Assessment’ overview, Understood noted that: “Often, assessments in the field of disability inclusion are self-led and self-reported. They tend to cover broad, high-level elements of a company’s practices” (Understood, n.d., para. 5). This is problematic not only because employees lack a distinct voice in corporate disability inclusion, but also because results from manager-led surveys assessing “attitudes toward hiring and retaining employees with disabilities” often present “a more positive picture than employment figures or ‘off the record’ anecdotal accounts” suggest (Colella, 1996, p. 409). In addition, top-down assessments may involve financial costs for the organization and require external parties or consultants to administer. An employee-centered approach is therefore crucial to ensuring that organizations are delivering on inclusive outcomes for employees with disabilities.

LEADS does not seek to replace any of the existing frameworks referenced above. Instead, it aims to fill top-down assessment coverage gaps through an open-access, standardized, and bottom-up, employee-centered framework that supplements organization-level self-assessments.

3. The Disclosure Gap

One of the most significant findings in disability employment research is the persistent gap between actual disability prevalence and voluntary self-identification rates for employees with disabilities. A widely cited survey by Boston Consulting Group (BCG) of nearly 28,000 employees across 16 countries found that while most organizations report 4% to 7% of employees as having disabilities, independently surveyed self-identification rates were significantly higher at approximately one quarter (25%) of respondents (Boston Consulting Group, 2023). Moreover, research from the Center for Talent Innovation (now Coqual) found that only around four in ten (39%) white-collar employees with disabilities in the U.S. had disclosed their disability status to a manager, with less than a quarter (24%) having told their team (Sherbin et al., 2017).

The reasons for this pattern are well understood. Research consistently identifies fears surrounding stigma, discrimination, impact on career progression, and confidentiality as key barriers to disclosure (Parker Harris et al., 2019; Bonaccio et al., 2020; Hassard et al., 2024; von Schrader et al., 2014). These persistent employee concerns are not just fears, but documented workplace realities. Research has shown that job applicants who disclosed a disability received 26% fewer expressions of employer interest than those who did not (Ameri et al., 2018). Within the workplace, a nationally representative survey by Coqual found that more than one-third (34%) of white-collar employees with disabilities in the U.S. experienced discrimination or negative bias at their companies (Sherbin et al., 2017). Similarly, a 2024 global survey of over 10,000 PWDs in workplaces across 20 countries by Deloitte found that more than four in ten (41%) surveyed PWDs reported experiencing either microaggressions, harassment, and/or bullying at work over the past 12 months, with only around half (52%) of incidents being formally reported (Deloitte Global, 2024).

At the individual level, employees who do not feel safe disclosing their disabilities to their employers cannot access adequate accommodations, limiting their ability to perform and increasing attrition (BCG, 2023). At the leadership level, managers play a critical role in employee disability disclosure decisions and disability inclusion outcomes (Strobel Gower, n.d., Managers section). At the organizational level, employers cannot make accurate inclusion decisions with insufficient employee data (von Schrader et al., 2014; Bonaccio et al., 2020; BCG, 2023).

Conventional top-down organizational assessments fail to close this gap because they rely on companies to report their own data. In contrast, research has shown that employee groups such as disability ERGs play a direct role as facilitators of disclosure for employees with disabilities (von Schrader et al., 2014). In response, LEADS is designed to work directly with employees, ERGs, and inclusion leaders to capture voices that top-down disability inclusion assessments structurally cannot.

4. Policy Grounding: Canada and Cross-Jurisdictional

LEADS was conceived and developed in a Canadian context. While its domains are grounded thematically in Canadian federal disability inclusion policies, the framework draws on a broad range of sources and should be understood as policy-informed, rather than policy-prescriptive. The table below provides a summary of some of the policies used to guide LEADS questions/domains:

Source	Relevance to LEADS
Canadian Human Rights Act	Ensures equality of opportunity, underpins the duty to accommodate, and defines legal obligations in federally regulated workplaces. Informs the L and A domains.
CHRC Guide for Federally Regulated Workplaces	Practical guidance on accommodation policies and processes, medical information, undue hardship, and return to work for federally regulated workplaces. Informs the L and A domains.
Accessible Canada Act	Requires federally regulated organizations to identify, remove, and prevent barriers to accessibility across employment, built environment, digital access, communication, the procurement and delivery of goods and services, and transportation. Informs the A and S domains.
Accessibility Standards Canada Employment Standard	Nationally approved standard for federally regulated employers to identify, prevent, and remove barriers in workplaces. Focus is placed on structural support/policy/leadership, culture/engagement/education, recruitment/hiring/onboarding, retention and career development, and accessibility support systems. Informs all five LEADS domains.
Disability Inclusion Action Plan	Four-pillar framework to guide government action on: financial security, employment, accessible and inclusive communities, and a modern approach to disability. Informs all five LEADS domains.
Employment Strategy for Canadians with Disabilities	Part of the broader Disability Inclusion Action Plan's second pillar and vision to close the disability employment gap by 2040 and improve the standard of living and quality of life for all Canadians through an inclusive labour market. Specific goals focus on helping individuals, employers, and enablers. Informs all five LEADS domains.
Bridging the Gap: Report on Disability Inclusion in Canadian Workplaces	Evidence-based recommendations for corporate employers to champion a culture of inclusion, adopt inclusive design principles, proactively offer accommodations, enshrine inclusivity throughout the full employee life cycle, ensure AI and technology accessibility, and set goals to measure success. Informs all five LEADS domains.
Government of Canada Workplace Accessibility Passport	Practical tool for employees with disabilities to document and address workplace barriers through accommodations and support measures, in collaboration with their managers. Informs the A domain.
Employment Equity Act	Requires federally regulated employers to take steps to investigate, identify, and take concrete actions to eliminate barriers and maintain proportional representation in the workplace for PWDs. Informs all five LEADS domains.
Personal Information Protection and Electronic Documents Act	Rules governing the appropriate collection, use, and disclosure of personal information (right of privacy of individuals). Informs the D domain and data governance for LEADS implementation (see Section 8.5).

Note: The policy references above primarily apply to federally regulated employers. Provincially regulated employers should refer to their applicable provincial policies and consult legal counsel regarding local obligations. LEADS also draws on international frameworks such as the UN Convention on the Rights of Persons with Disabilities (UN, 2006), the ILO's Convention No. 159 (ILO, 1983), and relevant peer-reviewed research.

5. Framework Design and Domain Structure

The LEADS Framework for Disability Inclusion is structured across five domains spanning the employee disability inclusion experience. Together, they form the acronym 'LEADS.' The domains were chosen to assess disability inclusion at all levels through an employee-centered approach.

L

Leadership Support

Does my manager actively support my workplace accommodation needs?

E

Equity in Opportunity

Do I have equal access to career development, promotion, and recognition?

A

Accommodation Adequacy

Are my accommodation needs met in a transparent, timely, and dignified way?

D

Disclosure and Dignity

Do I feel safe disclosing my disability without fear of discrimination or judgment?

S

Systemic and Cultural Inclusion

Does the culture of my organization actively support disability inclusion?

5.1 Design Principles

- Unlike the existing frameworks listed in Section 2 of this document, LEADS questions are answered by employees, not organizations or leadership teams. This is the central design principle behind LEADS as a bottom-up, employee-centered assessment framework.
- LEADS is designed to give employees a voice where organizational self-assessments often do not. It is intended to be used by employees, ERGs, and inclusion leaders in conjunction with existing assessments, not as a replacement.
- All questions are answered by all employees regardless of disability status. Respondents who prefer not to disclose a disability status are still included in aggregate domain findings. This also enables comparison between the experiences of employees with and without disabilities.
- LEADS assesses both leadership and organization-level criteria. These areas require separate measurement, as organizational policies alone are insufficient without manager action for translating disability inclusion commitments into day-to-day experiences for employees with disabilities (Schur et al., 2005; Bonaccio et al., 2020).
- Person-first language is used throughout this document in alignment with Government of Canada writing guidelines (Government of Canada, n.d.). It is understood that many members of the disability community prefer identity-first language or other terminology. Administrators are encouraged to adapt language and questions where needed.

6. Survey Questions by Domain

The following 40 survey questions are organized by the five LEADS domains. Questions are formatted as either 5-pt Likert (Strongly Agree/Agree/Neither Agree nor Disagree/Disagree/Strongly Disagree) or Yes / No. Each question includes a recommended response scale and policy or source references. All questions are positively keyed so that higher scores reflect higher disability inclusion. Every question also includes a “N/A or Prefer not to answer” option to allow for flexible responses and minimize result distortion. In addition, there are 10 demographic questions which appear at the end of the assessment. Administrators may adapt questions as needed for their organizations while preserving the core domain structures.

Policy and Source Reference Key:

- ACA: Accessible Canada Act²
- ADA: Americans with Disabilities Act³
- ASC: Accessibility Standards Canada
- BTG: Bridging the Gap – Report on Disability Inclusion in Canadian Workplaces
- CHRC: Canadian Human Rights Commission Guide for Federally Regulated Workplaces
- EEA: Employment Equity Act⁴
- EARN: Employer Assistance and Resource Network on Disability Inclusion
- ESCD: Employment Strategy for Canadians with Disabilities
- DIAP: Disability Inclusion Action Plan
- EEOC: U.S. Equal Employment Opportunity Commission Guidance on Reasonable Accommodation and Undue Hardship under the ADA
- FMLA: Family and Medical Leave Act⁵
- JAN: Job Accommodation Network Employer’s Practical Guide to Reasonable Accommodation under the Americans with Disabilities Act
- PIPEDA: Personal Information Protection and Electronic Documents Act⁶
- S.503: Section 503 of the Rehabilitation Act⁷
- WIOA: Workforce Innovation and Opportunity Act

Note: LEADS collects sensitive personal information such as disability status, disability type, and demographic data. Under PIPEDA, organizations transferring personal information (including across borders) via third-party platforms must ensure comparable protection through contractual means (e.g., a Data Processing Agreement, or ‘DPA’). Free personal accounts on platforms such as Google Forms or Microsoft Forms do not include DPAs. Administrators should use an enterprise version (e.g., Google Workspace, Microsoft 365 for Business, etc.) that provides a DPA or use an alternative compliant survey platform. Administrators in Quebec must additionally comply with Law 25.

² The ACA applies to all federally regulated private sector employers and the federal public service, regardless of size.

³ ADA Title I applies to employers with 15 or more employees. Smaller employers may be governed by state disability discrimination laws.

⁴ The EEA applies to all federally regulated private sector employers with 100+ employees and the federal public service.

⁵ The FMLA applies to employers with 50+ employees within 75 miles of the worksite, and employees who have worked 12+ months and 1,250+ hours in the past year.

⁶ PIPEDA remains the operative federal privacy law in Canada as of 2026. Bill C-27 (the Digital Charter Implementation Act, 2022), which proposed replacing PIPEDA with the Consumer Privacy Protection Act (CPPA), lapsed in January 2025. Federal privacy policy reform is expected in the 45th Parliament. Administrators should monitor the Office of the Privacy Commissioner of Canada for updates to applicable law.

⁷ S.503 applies specifically to federal contractors and subcontractors with contracts of >\$20,000, regardless of size. Federal contractors or subcontractors with contracts of >\$50,000 and 50+ employees have additional obligations under S.503.

6.1 Does my manager actively support my workplace accommodation needs?

L Leadership Support

#	Survey question	Scale	Policy ref.
L1	My manager actively supports my workplace accommodation needs.	5-pt Likert	CHRC; ACA
L2	I feel comfortable approaching my manager to arrange or adjust an accommodation need.	5-pt Likert	CHRC; ADA
L3	Leadership at my organization visibly and actively champions disability inclusion.	5-pt Likert	BTG; ASC; CHRC; DIAP; ESCD
L4	My manager applies workplace policies consistently, including for employees with disabilities.	5-pt Likert	BTG; ADA; EEA
L5	My manager treats accommodation requests with confidentiality and respect.	5-pt Likert	CHRC; PIPEDA
L6	I trust that my manager would advocate for me if I needed a workplace accommodation.	5-pt Likert	CHRC; ASC; EEA
L7	My manager has the knowledge, training, and tools to support employees with disabilities effectively.	5-pt Likert	BTG; JAN; EEA; ASC
L8	I have observed my manager take proactive, meaningful action for disability inclusion in the past 12 months.	Yes / No / Don't know	BTG; CHRC; EARN; ASC

6.2 Do I have equal access to career development, promotion, and recognition?

E Equity in Opportunity

#	Survey question	Scale	Policy ref.
E1	I have equal access to career development and advancement opportunities regardless of my disability status.	5-pt Likert	CHRC; ADA; EEA; WIOA; ASC
E2	My performance evaluations have been conducted fairly, without regard to my disability status.	5-pt Likert	CHRC; EEA; ADA
E3	I have the same access to mentorship and sponsorship as my colleagues, regardless of my disability status.	5-pt Likert	ESCD; EEA; WIOA; DIAP
E4	I am aware of formal mentoring or development programs for employees with disabilities at my organization.	Yes / No / Don't know	ESCD; EEA; DIAP
E5	My contributions are recognized equitably relative to my peers.	5-pt Likert	BTG; ASC; EEA; CHRC
E6	I feel I can pursue leadership roles at my organization without my disability status being a barrier.	5-pt Likert	ESCD; ADA; EEA; WIOA; DIAP
E7	My workload and responsibilities are structured in a way that accounts for my accommodation needs.	5-pt Likert	CHRC; ADA; EEA

6.3 Are my accommodation needs met in a transparent, timely, and dignified way?

A Accommodation Adequacy

#	Survey question	Scale	Policy ref.
A1	I am aware of my organization's accommodation request process.	Yes / No / Don't know	CHRC; ACA
A2	My organization has a formal, written accommodation policy that is available to all employees.	Yes / No / Don't know	ASC; CHRC; ACA
A3	The accommodation request process is transparent and easy to navigate.	5-pt Likert	CHRC; JAN
A4	My accommodation requests have been processed in a timely manner.	5-pt Likert	CHRC; BTG; EEA
A5	I have received the workplace adjustments needed to perform my job effectively.	5-pt Likert	CHRC; ADA; EEA
A6	The process for requesting an accommodation felt respectful and dignified.	5-pt Likert	CHRC; ADA
A7	I know who to contact if my accommodation needs change or if I wish to raise a concern about my accommodations.	Yes / No / Don't know	CHRC; JAN; EEA
A8	The physical workspace in my primary work location is accessible for employees with disabilities.	5-pt Likert	ACA; ADA; CHRC
A9	The digital tools and technologies used at my organization are accessible for employees with disabilities.	5-pt Likert	ACA; ADA

6.4 Do I feel safe disclosing my disability without fear of discrimination or judgment?

D Disclosure and Dignity

#	Survey question	Scale	Policy ref.
D1	My organization has a culture that works to reduce stigma surrounding disability.	5-pt Likert	BTG; CHRC; ASC
D2	I feel safe voluntarily disclosing a disability at my organization without fear of discrimination or retaliation.	5-pt Likert	CHRC; ADA
D3	I am aware of my organization's whistleblower and anti-retaliation protections if I raise disability-related concerns or violations.	Yes / No / Don't know	CHRC; ADA; EEOC
D4	I trust that information I disclose about my disability will remain confidential.	5-pt Likert	PIPEDA; ADA
D5	I would feel comfortable disclosing a disability to my manager.	5-pt Likert	CHRC; ADA
D6	I have observed colleagues or leaders speak openly and positively about disability.	5-pt Likert	BTG; EARN
D7	My organization has invited me to voluntarily self-identify my disability status through a formal process.	Yes / No / Don't know	CHRC; ESCD; DIAP; S.503; EEA

6.5 Does the culture of my organization actively support disability inclusion?

S Systemic and Cultural Inclusion

#	Survey question	Scale	Policy ref.
S1	My organization has a disability-focused Employee Resource Group (ERG) or equivalent.	Yes / No / Don't know	BTG; EARN
S2	I am aware of my organization's stated disability inclusion goals and strategy.	Yes / No / Don't know	BTG; ACA
S3	My organization communicates transparently and regularly about disability inclusion policies, resources, and outcomes.	5-pt Likert	CHRC; ACA; ASC; ESCD; DIAP
S4	My organization provides adequate resources (training, budget, and dedicated personnel) to support disability inclusion.	5-pt Likert	BTG; ESCD; EARN; WIOA
S5	I feel a genuine sense of belonging at my organization, regardless of disability status.	5-pt Likert	ESCD; DIAP
S6	Colleagues without disabilities actively support disability inclusion in my workplace.	5-pt Likert	BTG; EARN
S7	My organization's disability inclusion commitments are reflected in day-to-day practices, not only in stated policies.	5-pt Likert	BTG; ASC; DIAP
S8	My organization proactively solicits feedback from employees with disabilities to improve inclusion outcomes.	5-pt Likert	ESCD; DIAP
S9	I feel that disability inclusion is genuinely valued in the culture of my organization.	5-pt Likert	BTG; DIAP; ACA; ASC

7. Demographic Questions

The following demographic questions should appear at the **end** of the assessment. All questions include a “N/A or Prefer not to answer” option. Responses are collected anonymously and reported only in aggregate. Organizations should review their data governance policies and obligations under PIPEDA or equivalent applicable privacy laws⁸ before implementing LEADS. No individual-level data should be stored, reported, or shared. See Section 8.5 for additional guidance.

Survey Question	Response type	Notes
Do you identify as having a disability?	Yes / No / Don't know / N/A or Prefer not to answer	<i>Core filter for domain analysis</i>
What type(s) of disability do you have? (If applicable, select all that apply)	Check all that apply / N/A or Prefer not to answer	<i>Physical/mobility, cognitive/learning, sensory, mental health, chronic illness/pain, neurodivergent, other</i>
What is your role level?	Multi-choice / N/A or Prefer not to answer	<i>Individual contributor, leader (manager/team-lead), executive (VP+)</i>
How long have you worked at this organization?	Multi-choice / N/A or Prefer not to answer	<i><1 yr, 1–3 yrs, 3–5 yrs, 5–10 yrs, 10+ yrs</i>
Which office location do you primarily work from?	Multi-choice / N/A or Prefer not to answer	<i>Customize per organization</i>
In what functional area do you primarily work?	Multi-choice / N/A or Prefer not to answer	<i>Customize per organization</i>
How do you primarily complete your work?	Multi-choice / N/A or Prefer not to answer	<i>Onsite, remote, hybrid</i>
What is your gender identity?	Multi-choice / N/A or Prefer not to answer	<i>Woman, man, non-binary, genderfluid, prefer to self describe / other</i>
Do you identify as 2SLGBTQ+?	Yes / No / Don't know / N/A or Prefer not to answer	<i>Intersectionality and inclusive initiatives context</i>
What is your race or ethnicity?	Check all that apply / N/A or Prefer not to answer	<i>Standard options per jurisdiction, prefer to self describe / other</i>

⁸ Organizations with employees in Quebec should also review applicable obligations under Quebec's Act to modernize legislative provisions regarding the protection of personal information (Law 25), including potential Privacy Impact Assessment requirements.

8. Implementation Guide

8.1 Who Should Use This Framework

LEADS is designed to be openly available for use and implementation by employees, disability ERGs, and inclusion leaders within Canadian and U.S. organizations. The framework can also be adapted for organizations outside of Canada and the U.S. (see Section 10). Because no external party or consultant is required to administer the assessment, administrators should review their data privacy obligations (see Section 8.5) prior to implementing LEADS.

8.2 Minimum Response Thresholds

A minimum of 100 responses is recommended for meaningful organization-level analysis. For location or office-level analysis, a minimum of 50 responses is recommended. For subgroup analysis, such as by disability status, role, etc., a minimum of 30 responses is recommended. The latter should not be reported separately if it risks individual identification, consistent with best practices for protecting sensitive personal information under applicable privacy laws (e.g., PIPEDA).

8.3 Recommended Implementation Process

1. Administrators review and adapt LEADS assessment questions as needed for their organization, while preserving the core five domain framework.
2. Administrators create the survey on an appropriate platform (see Section 8.5), set a survey deadline, and distribute an anonymous link to all employees in their office(s).
3. Administrators gather responses and calculate the average Likert-scale scores and percentage of Yes / No responses for each question (see Domain Scorecard Template).
4. Administrators calculate domain averages and prepare a report for management outlining the results for each domain, low-scoring questions, key findings, and recommended actions.
5. Administrators present this report to senior leadership, along with a 90-day action plan with Key Performance Indicators (KPIs) to address any concerns raised by assessment findings.
6. Administrators repeat this process annually to track year-over-year progress.
7. Administrators share anonymous aggregate results with participants and the wider organization to ensure transparency, dialogue, and increased responses for future surveys.

8.4 Response Scoring Rubric

Score	Rating	Recommended action
4.5–5.0 Avg 90–100% Yes	Exemplary	Share as best practices across the organization and track yearly changes
3.5–4.4 Avg 70–89% Yes	Adequate	Identify specific low-scoring areas for targeted improvements
2.5–3.4 Avg 50–69% Yes	Needs improvement	Develop a firm action plan with management and senior leadership
< 2.5 Avg < 50% Yes	Critical	Escalate immediately to senior leadership and engage HR and legal teams

Note: Survey and Domain Scorecard Templates are attached at the end of this framework document. Administrators are encouraged to complete one scorecard per assessment cycle. For Likert scale question scoring: 1 = Strongly Disagree, 2 = Disagree, 3 = Neither Agree nor Disagree, 4 = Agree, 5 = Strongly Agree. For Yes / No question scoring: calculate the percentage of “Yes” responses. Questions answered as “Don’t know” or “N/A or Prefer not to answer” are excluded.

8.5 Data Privacy and Ethical Administration

LEADS collects sensitive personal information. Administrators must ensure they comply with all applicable privacy protection laws such as PIPEDA and provincial privacy laws or equivalent policies in other jurisdictions. As there is no PIPEDA equivalent in the U.S., administrators should review ADA confidentiality requirements and applicable state privacy laws. In all implementations:

1. Survey responses must be collected anonymously. No individual employee data should be stored, reported, or shared. LEADS results should be reported only in aggregate.
2. All participants must be explicitly informed of the assessment's purpose, how survey response data will be handled, and that participation in the assessment is entirely voluntary.
3. Collect, retain, and share information only as necessary for the stated purpose of LEADS.
4. Do not report subgroup results if there is a risk of individual identification (see Section 8.2).
5. If using a third-party survey platform such as Google or Microsoft Forms, administrators should review the applicable data processing agreement (DPA). Cross-border data transfers must be governed by DPAs or equivalent safeguards, in accordance with PIPEDA guidance.

8.6 Limitations

8.6.1 Psychometric Validation

LEADS was developed using policy frameworks and peer-reviewed literature. It has not undergone formal psychometric validation at this time. Planned exploratory factor analysis, confirmatory factor analysis, test-retest reliability, and convergent validity testing will follow multiple pilot organization implementations. Organizations and researchers who compile results based on LEADS are strongly encouraged to share findings and feedback with the author to support this process.

8.6.2 Coverage Gaps

LEADS currently does not address: (a) the experiences of PWDs across the full employee life cycle; (b) barriers that managers and HR leaders may face in supporting employees with disabilities; or (c) organizational workforce outcome data. Because of these coverage limitations, LEADS is intended to be used in conjunction with existing disability inclusion assessments (such as those referenced in Section 2) and compared with organizational outcome data.

8.6.3 Scope of Application

LEADS is an employee-centered, self-reported disability inclusion assessment that measures employee perceptions, rather than outcomes. As with all self-reported data, responses may be subject to bias. Administrators must clearly communicate survey purpose and privacy protections.

8.6.4 Regional Adaptation

As this document draws largely on Canadian and U.S. policies, organizations implementing LEADS in other jurisdictions should review all policy references and questions according to their applicable local standards. Please see Sections 9 and 10 for guidance on using LEADS in other jurisdictions.

8.7 Alignment with Institutional Standards

To the best of the author's knowledge: (a) LEADS framework domains and questions are tied to recognized Canadian and U.S. policy frameworks and peer-reviewed research; (b) LEADS is consistent with Canadian federal disability law and U.S. law; (c) data governance is consistent with PIPEDA; (d) LEADS is openly available under CC BY-NC 4.0; (e) limitations are acknowledged and a formal validation pathway is identified; and (f) feedback from administrators is actively solicited.

9. Applicability to the United States

While LEADS was developed largely in a Canadian context, the framework's core disability inclusion domains are consistent across both Canadian and U.S. research. LEADS is readily applicable to U.S. organizations with minimal adaptation.

	LEADS Domain	Canadian Policy Basis	U.S. Equivalent/Addition
L	Leadership Support	CHRC; BTG; DIAP	ADA; EEOC; EARN; JAN
E	Equity in Opportunity	CHRC; ESCD; DIAP; EEA	ADA; S.503; WIOA
A	Accommodation Adequacy	CHRC; Government of Canada Workplace Accessibility Passport; ESCD	ADA; EEOC; JAN; FMLA (return to work)
D	Disclosure and Dignity	PIPEDA; CHRC	ADA; EEOC; S.503; Applicable state laws ⁹
S	Systemic and Cultural Inclusion	ACA; BTG; DIAP	ADA; S.503; EARN; WIOA

9.1 Additional U.S. Considerations

Interactive Process

ADA guidance by the EEOC expects that employers engage in a two-way interactive process with employees who request accommodations (EEOC, 2002). The LEADS A and L domains directly assess whether employee experience reflects transparent, timely, and effective reasonable accommodations.

State Disability Laws

Several U.S. states have disability employment laws that are more protective than the ADA, such as California's FEHA, New York's Human Rights Law, and Washington's Law Against Discrimination (Bloomberg Law, 2024). Organizations implementing LEADS in the U.S., especially those with multiple office locations, should review applicable state laws and consider consulting legal counsel.

EARN and JAN Resources

Once LEADS results are obtained, leverage the U.S. Office of Disability Employment Policy (ODEP)'s Employer Assistance and Resource Network on Disability Inclusion (EARN) and Job Accommodation Network (JAN) for free information, resources, and consultation on workplace accommodation best practices, recruitment and hiring of people with disabilities, technical assistance, employer toolkits, and accommodation consultation.

⁹ There is currently no U.S. federal equivalent to PIPEDA. Administrators should review applicable state privacy laws.

10. Application Beyond Canada and the U.S.

The LEADS Framework for Disability Inclusion was conceived and developed in a Canadian and U.S. context, drawing on Canadian federal policy and U.S. disability employment law. That said, the framework's central design principle of working directly with employees, not organizations or leadership teams, and its domains assessing whether employees with disabilities feel supported by their leaders, teams, and organizations are not specific to any particular region(s).

The following outlines key policy considerations for adapting LEADS beyond Canada and the U.S. The International Labour Organization's Convention No. 159 (Vocational Rehabilitation and Employment of Disabled Persons) and the United Nations Convention on the Rights of Persons with Disabilities are relevant for all LEADS regional implementations (ILO, 1983; UN, 2006).

10.1 Latin America (LATAM)

- Organization of American States (OAS): Inter-American Convention on the Elimination of All Forms of Discrimination against Persons with Disabilities (CIADDIS)
- Argentina: Sistema de protección integral de las personas con discapacidad (Ley 22.431)
- Brazil: Lei Brasileira de Inclusão da Pessoa com Deficiência (Lei 13.146)
- Colombia: Por medio de la cual se establecen las disposiciones para garantizar el pleno ejercicio de los derechos de las personas con discapacidad (Ley 1618)
- Costa Rica: Ley para la Promoción de la Autonomía Personal de las Personas con Discapacidad (Ley 9379)
- Mexico: Ley General para la Inclusión de las Personas con Discapacidad

10.2 Europe (EU)

- United Kingdom: Equality Act 2010 and Disability Confident scheme
- European Union: European Disability Strategy 2021–2030
- European Union: Corporate Sustainability Reporting Directive (CSRD)
- European Union: Employment Equality Directive (2000/78/EC)

10.3 Asia-Pacific (APAC)

- Australia: Disability Discrimination Act 1992 (DDA) and Australia's Disability Strategy 2021–2031 (ADS)
- China: Law of the People's Republic of China on the Protection of Disabled Persons (中华人民共和国残疾人保障法) and Regulations on the Employment of Persons with Disabilities (残疾人就业条例)
- Hong Kong SAR: Disability Discrimination Ordinance (Cap. 487)
- India: Rights of Persons with Disabilities Act, 2016 (replacing the 1995 Persons with Disabilities Act)
- Japan: Act for Eliminating Discrimination against Persons with Disabilities (障害を理由とする差別の解消の推進に関する法律) and the Basic Act for Persons with Disabilities (障害者基本法)
- Singapore: Enabling Masterplan 2030

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LEADS Survey and Domain Scorecard Template

This section provides two resources for administrators: the Survey Template for distribution to employees, and the Domain Scorecard for recording, calculating, and interpreting results. Both templates may be adapted as needed for your organization while preserving the core five-domain structure. A ready-to-use 50-question survey template is available on the LEADS website, along with an automated score calculator. Administrators are also highly encouraged to fill out the post-deployment feedback form on our website to support future improvement of the framework.

Survey Template

This preface should appear at the beginning of the assessment and be followed by the 40 domain questions and optionally the 10 demographic questions from Sections 6 and 7:

For Administrators: This template is meant to be duplicated to your organization's own Microsoft 365 for Business (or equivalent enterprise) account for deployment internally.

Purpose: This survey is part of the LEADS Framework for Disability Inclusion: A Bottom-Up, Employee-Centered Assessment Framework, which collects employee perspectives on disability inclusion at your organization. Results are used by your administrator (e.g., your colleagues, Employee Resource Group, or inclusion team) to assess whether leaders, teams, and your organization are providing adequate disability support.

Voluntary participation: Participation is entirely voluntary, and you may choose not to answer any question or stop the assessment at any time.

Anonymity: Your responses are collected completely anonymously. No individual's data is stored, reported, or shared. Survey results will be reported only in aggregate, and any subgroup with fewer than 30 respondents will not be reported separately. Individual responses will be deleted by your administrator after aggregate analysis is complete.

Data access: Data is only accessed by designated survey administrators. Results will be reported in aggregate to organizational leadership as part of the disability inclusion assessment. A summary of findings will also be shared with all participating employees and the wider organization.

Data storage: This survey is hosted on Microsoft Forms and should be configured by your administrator to comply with PIPEDA and applicable local privacy legislation (e.g., Quebec's Law 25). Administrators are responsible for ensuring compliance prior to distribution using Data Processing Agreements or other comparable protections.

No identifying information: Do not include your name, employee ID, manager's name, or any other identifying information in your responses.

Estimated time: 15 minutes.

By proceeding, you confirm that you have read and understood this notice and voluntarily consent to participate in this assessment. If you have any questions about this survey or how your data will be used, please contact your survey administrator before proceeding.

Note: LEADS collects sensitive personal information such as disability status, disability type, and demographic data. Raw individual-level response data should be deleted by the administrator within 90 days of completing aggregate analysis. Under PIPEDA, organizations transferring personal information (including across borders) via third-party platforms must ensure comparable protection through contractual means (e.g., a Data Processing Agreement, or DPA). Free personal accounts on platforms such as Google Forms or Microsoft Forms do not include DPAs. Administrators should use an enterprise version (e.g., Google Workspace, Microsoft 365 for Business, etc.) that provides a DPA, or use an alternative privacy-compliant survey platform. Administrators in Quebec must additionally comply with Law 25.

Domain Scorecard Template

Organization/Office:	[Enter]	Date:	[Enter]
Administered By:	[Enter]	Total Respondents:	[Enter]

	Domain	Qs	Avg Score /5.0	Rating	Key Finding	Priority Action
L	Leadership Support	8	___/5	[]	[]	[]
E	Equity in Opportunity	7	___/5	[]	[]	[]
A	Accommodation Adequacy	9	___/5	[]	[]	[]
D	Disclosure and Dignity	7	___/5	[]	[]	[]
S	Systemic and Cultural Inclusion	9	___/5	[]	[]	[]
	OVERALL	40	___/5	[]	[Top Findings]	[Top Priorities]

Response Scoring Rubric

Score	Rating	Recommended action
4.5 – 5.0 Avg 90-100% Yes	Exemplary	Share as best practices across the organization and track yearly changes
3.5 – 4.4 Avg 70-89% Yes	Adequate	Identify specific low-scoring areas for targeted improvements
2.5 – 3.4 Avg 50-69% Yes	Needs improvement	Develop a firm action plan with management and senior leadership
< 2.5 Avg < 50% Yes	Critical	Escalate immediately to senior leadership and engage HR and legal teams

Note: For domains containing Yes/No questions, convert each Yes/No question's percentage to the linearly equivalent Likert score before calculating domain averages (see Scoring Guidance Section).

Scoring Guidance

Calculate the average Likert score for each domain. Questions answered as “Don’t know” or “N/A or Prefer not to answer” are excluded from aggregate question and domain averages or Yes / No percentage calculations.

For Likert scale question scoring: 1 = Strongly Disagree, 2 = Disagree, 3 = Neither Agree nor Disagree, 4 = Agree, 5 = Strongly Agree.

For Yes / No question scoring: calculate the percentage of “Yes” responses among respondents who answered and the equivalent linearly scaled Likert score within the applicable band (e.g., a 90% Yes falls in the 90-100% Yes / Exemplary band; interpret as $90\% \times 5 = 4.5/5.0$, and a 55% Yes falls in the 50–69% Yes / Needs Improvement band; interpret as $55\% \times 5 = 2.75/5.0$. For all four bands, the conversion formula is:

$$\text{Equivalent Likert Score} = \text{Yes \%} \times 5$$

Enter results below. The overall LEADS score is the unweighted average of all five domain averages.

Domain Response Report

L Leadership Support | 8 questions (7 Likert, 1 Yes/No)

#	Survey Question (paste or abbreviate)	Scale	Score / %Yes	Key Finding
L1	[Question text]	5-pt Likert	___ /5.0	[Finding]
L2	[Question text]	5-pt Likert	___ /5.0	[Finding]
L3	[Question text]	5-pt Likert	___ /5.0	[Finding]
L4	[Question text]	5-pt Likert	___ /5.0	[Finding]
L5	[Question text]	5-pt Likert	___ /5.0	[Finding]
L6	[Question text]	5-pt Likert	___ /5.0	[Finding]
L7	[Question text]	5-pt Likert	___ /5.0	[Finding]
L8	[Question text]	Yes / No	___ % Yes; ___ /5.0	[Finding]
Domain Average		5-pt Likert	___ /5.0	[Rating]

Key Insight / Observation: [Enter]

Priority Action (owner / date / KPI): [Enter]

E Equity in Opportunity | 7 questions (6 Likert, 1 Yes/No)

#	Survey Question (paste or abbreviate)	Scale	Score / %Yes	Key Finding
E1	[Question text]	5-pt Likert	___ /5.0	[Finding]
E2	[Question text]	5-pt Likert	___ /5.0	[Finding]
E3	[Question text]	5-pt Likert	___ /5.0	[Finding]
E4	[Question text]	Yes / No	___ % Yes; ___ /5.0	[Finding]
E5	[Question text]	5-pt Likert	___ /5.0	[Finding]
E6	[Question text]	5-pt Likert	___ /5.0	[Finding]
E7	[Question text]	5-pt Likert	___ /5.0	[Finding]
Domain Average		5-pt Likert	___ /5.0	[Rating]

Key Insight / Observation: [Enter]

Priority Action (owner / date / KPI): [Enter]

A Accommodation Adequacy | 9 questions (6 Likert, 3 Yes/No)

#	Survey Question (paste or abbreviate)	Scale	Score / %Yes	Key Finding
A1	[Question text]	Yes / No	___% Yes; ___/5.0	[Finding]
A2	[Question text]	Yes / No	___% Yes; ___/5.0	[Finding]
A3	[Question text]	5-pt Likert	___/5.0	[Finding]
A4	[Question text]	5-pt Likert	___/5.0	[Finding]
A5	[Question text]	5-pt Likert	___/5.0	[Finding]
A6	[Question text]	5-pt Likert	___/5.0	[Finding]
A7	[Question text]	Yes / No	___% Yes; ___/5.0	[Finding]
A8	[Question text]	5-pt Likert	___/5.0	[Finding]
A9	[Question text]	5-pt Likert	___/5.0	[Finding]
	Domain Average	5-pt Likert	___/5.0	[Rating]

Key Insight / Observation: [Enter]

Priority Action (owner / date / KPI): [Enter]

D Disclosure and Dignity | 7 questions (5 Likert, 2 Yes/No)

#	Survey Question (paste or abbreviate)	Scale	Score / %Yes	Key Finding
D1	[Question text]	5-pt Likert	___/5.0	[Finding]
D2	[Question text]	5-pt Likert	___/5.0	[Finding]
D3	[Question text]	Yes / No	___% Yes; ___/5.0	[Finding]
D4	[Question text]	5-pt Likert	___/5.0	[Finding]
D5	[Question text]	5-pt Likert	___/5.0	[Finding]
D6	[Question text]	5-pt Likert	___/5.0	[Finding]
D7	[Question text]	Yes / No	___% Yes; ___/5.0	[Finding]
	Domain Average	5-pt Likert	___/5.0	[Rating]

Key Insight / Observation: [Enter]

Priority Action (owner / date / KPI): [Enter]

S Systemic and Cultural Inclusion | 9 questions (7 Likert, 2 Yes/No)

#	Survey Question (paste or abbreviate)	Scale	Score / %Yes	Key Finding
S1	[Question text]	Yes / No	___% Yes; ___/5.0	[Finding]
S2	[Question text]	Yes / No	___% Yes; ___/5.0	[Finding]
S3	[Question text]	5-pt Likert	___/5.0	[Finding]
S4	[Question text]	5-pt Likert	___/5.0	[Finding]
S5	[Question text]	5-pt Likert	___/5.0	[Finding]
S6	[Question text]	5-pt Likert	___/5.0	[Finding]
S7	[Question text]	5-pt Likert	___/5.0	[Finding]
S8	[Question text]	5-pt Likert	___/5.0	[Finding]
S9	[Question text]	5-pt Likert	___/5.0	[Finding]
	Domain Average	5-pt Likert	___/5.0	[Rating]

Key Insight / Observation: [Enter]

Priority Action (owner / date / KPI): [Enter]

90-Day Action Plan

Recommended Action	Domain(s)	Owner	Date
[Enter action]	[L/E/A/D/S]	[Owner]	[Date / KPI]
[Enter action]	[L/E/A/D/S]	[Owner]	[Date / KPI]
[Enter action]	[L/E/A/D/S]	[Owner]	[Date / KPI]
[Enter action]	[L/E/A/D/S]	[Owner]	[Date / KPI]
[Enter action]	[L/E/A/D/S]	[Owner]	[Date / KPI]
[Enter action]	[L/E/A/D/S]	[Owner]	[Date / KPI]

Year-over-Year Comparison

#	Domain	Prior Score	Current Score	Change	Trend / Note
L	Leadership Support	___	___	___	[Trend]
E	Equity in Opportunity	___	___	___	[Trend]
A	Accommodation Adequacy	___	___	___	[Trend]
D	Disclosure and Dignity	___	___	___	[Trend]
S	Systemic and Cultural Inclusion	___	___	___	[Trend]

LEADS Framework for Disability Inclusion: A Bottom-Up, Employee-Centered Assessment Framework Version 1.0
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