



# CNSC Accessibility Plan 2022–25

## “Nothing Without Us”

December 2022



## **CNSC Accessibility Plan 2022–25**

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### **Document availability**

This document is also available upon request in multiple formats (large print, Braille, audio cassette, audio CD, e-text diskette, e-text CD or DAISY). Copies can be requested by [email \(accessibilityplan-planaccessibilite@cnsccsn.gc.ca\)](mailto:accessibilityplan-planaccessibilite@cnsccsn.gc.ca), by telephone at 1 800 0-Canada (1-800-622-6232) or by teletypewriter (TTY) at 1-800-926-9105.

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## Message from the President

I am pleased to deliver the Canadian Nuclear Safety Commission’s *CNSC Accessibility Plan 2022–25*. We prepared this plan in response to the landmark *Accessible Canada Act (ACA)*, whose goal is to make Canada barrier-free by 2040. This strategic document spells out how we will identify, remove and prevent physical, systemic and cultural barriers to accessibility within CNSC workplaces. As our first accessibility plan, it builds on – and helps bolster – our commitment to applying Gender-based Analysis Plus (GBA+) to our work in an ongoing and important effort toward creating and maintaining inclusive and accessible programs, policies and practices.

We started out by conducting a thorough review of our working environments, systems and practices to carefully assess how to improve accessibility across the CNSC. Through this review, we concluded that we need to consult more with people living with disabilities. In line with the ACA’s driving principle of “Nothing without us”, internal subject matter experts invited staff across the CNSC, particularly those who identify as living with a disability, to provide input on how to make our organization more inclusive. Our new accessibility employee network provided substantial guidance from personal experience to this effort. The findings from this work delivered solid, practical recommendations on the steps we must take to ensure everyone at the CNSC finds a welcoming, inclusive and supportive environment within which they can contribute their best effort and flourish.

With this plan, we are well positioned to start this work and put our plans into action over the next 3 years. Simultaneously, we will continue to seek counsel from our employees and members of the public, and specifically from people living with disabilities, to make this plan even stronger. We invite you to consider what is written here and welcome your feedback.

We strengthen our regulatory safety culture, spur innovation and collaboration, and encourage better decision-making when our workforce fully reflects Canada’s diverse society. We stand committed to using GBA+ in our work and decision making to ensure our platforms, content, policies, services and workplace initiatives are equally accessible to everyone. This accessibility plan supports our equity, diversity and inclusion goals using GBA+ to specify how to meet our responsibility to develop and maintain a barrier-free workplace.

Together, we will build an even more inclusive environment than we already have – one that truly gives everybody an equal opportunity to participate.

Rumina Velshi  
President and CEO

## Message from the Accessibility Network

The Accessibility Network’s goal is to support employees with disabilities and improve accessibility at the CNSC, by connecting employees with each other, promoting awareness, and influencing management action to break down barriers.

More than 20% of Canadians currently live with at least one disability<sup>1</sup>, and nearly all of us will experience disability of some sort during our lifetime.<sup>2</sup> Disabilities take many forms: visible, invisible, physical, mental, cognitive, temporary, episodic, chronic, and more. We may not recognize disabilities in others or even in ourselves. We also may not realize how these diverse disabilities can affect someone’s day-to-day experience of a world not built with them in mind.

People with disabilities have been fighting for a long time for a more accessible world. The impacts of hard-earned victories often extend beyond the disability community to benefit wider society. A quintessential example of this is curb cuts – the part of a sidewalk that ramps down to smoothly join the road. Thanks to wheelchair users’ protests in the 60s, we can now all more easily navigate our neighbourhoods with strollers, scooters, groceries, and so on<sup>3</sup>.

People with disabilities are disproportionately unemployed and under-employed. Not only is this an injustice to the individuals being denied access to income, but it also represents an untapped pool of talent ready to be unlocked. Organizations willing to put in the effort to develop and maintain diverse workforces tend to be more innovative and are more likely to retain talent, among various other benefits.

Recruiting, retaining, and promoting employees with disabilities is about more than just providing appropriate accommodations. It’s about creating a workplace that’s more fundamentally accessible, by bringing an “accessibility first” mindset to everything we do. Each of us can contribute to the accessibility of our workplace and the services we provide, with the support of strong organizational leadership.

The CNSC serves all Canadians, not just those who can easily access its facilities and processes. All stakeholders deserve to be heard, especially those who may be disproportionately affected by CNSC decisions and actions. This equity can be achieved by making sure our public processes engagement activities are accessible, as well as by employing a diverse workforce. Employees with diverse lived experience bring different perspectives to the table. Additionally, diverse representation at all levels of the public service ultimately leads to better decision making.

In closing, we are excited to see the CNSC taking steps towards becoming an accessibility-confident agency, through the many actions outlined in this accessibility plan.

Accessibility is for everyone!

John Thelen  
Accessibility Network Chair

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<sup>1</sup> [A demographic, employment and income profile of Canadians with disabilities aged 15 years and over, 2017 \(statcan.gc.ca\)](https://www150.statcan.gc.ca/n1/pub/99-011-x/2017001/article/00001-eng.htm)

<sup>2</sup> [Disability and health \(who.int\)](http://www.who.int/news-room/fact-sheets/detail/disability-and-health)

<sup>3</sup> [99percentinvisible.org](http://99percentinvisible.org)

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## General

The CNSC regulates the use of nuclear energy and materials to protect the health, safety and security of Canadians and the environment; to implement Canada’s international commitments on the peaceful use of nuclear energy; and to disseminate objective scientific, technical and regulatory information to the public.

The CNSC recognizes and values the diversity of its workforce. We are committed to creating and maintaining an inclusive, barrier-free and non-discriminatory work environment to ensure that all staff can effectively and efficiently contribute their skills and experience to deliver on our mandate. This includes ensuring that staff have an equal opportunity to participate in all work-related activities.

We also believe in offering accessibility and accommodation programs and support so as to preserve the well-being and the dignity of employees seeking these services. This 2022–25 CNSC Accessibility Plan, developed by our new Accessibility Plan Working Group, is centered on achieving outcomes that ensure that:

- persons with disabilities are employed across the organization
- persons with disabilities are engaged, provided with timely support and career progression opportunities, and empowered to reach their full potential
- persons with disabilities, including employees and stakeholders, have equitable access to the built environment, programs and services, information and communications technologies, and accessible and plain-language content
- employees at all levels are aware of the goals of the *Accessible Canada Act* to achieve full and equal participation of all persons in society, especially persons with disabilities, and to proactively identify, remove and prevent barriers to accessibility
- policies, programs and services are accessible and promote equity, diversity and inclusion in the CNSC

Consultations and feedback from persons with disabilities were vital to the development of this plan, and their input will continue to inform the plan’s implementation and future iterations. We encourage and welcome all employees and members of the public to continue to provide feedback.

## Executive summary

The [Accessible Canada Act \(ACA\)](#), received Royal Assent on June 21, 2019, and came into force on July 11, 2019, to make Canada barrier-free by January 1, 2040. The ACA applies to organizations under federal responsibility, including the Government of Canada, government departments, agencies and Crown corporations, parts of the private sector that the Government of Canada regulates and parliamentary entities.

In accordance with the ACA, the CNSC is proud to deliver its first accessibility plan. The plan presents a thorough review of CNSC policies, programs, practices and services in relation to the identification, removal and prevention of barriers to full participation. The intent of this plan is to be inclusive by design and accessible to all. It outlines a strategy that supports the CNSC's equity, diversity and inclusion objectives to build and maintain a diverse and inclusive workforce. This plan contributes to the CNSC's strategic priorities of being a modern, trusted and agile nuclear regulator who is a leader of influence in global nuclear efforts.

This plan outlines objectives, identifies barriers and prescribes concrete actions to remove and prevent barriers within each of the following priority areas identified by the ACA:

- **Employment:** Improve recruitment, widen recruitment pools, reduce barriers in hiring processes.
- **The built environment:** Provide an accessible built environment to support employees and the public through barrier-free access to CNSC-managed facilities.
- **Information and communication technology (ICT):** Ensure that CNSC employees and the people the organization serves can perceive, understand, navigate and interact with its information and digital tools and services.
- **Communication, other than ICT:** Content, in print and on digital platforms, provides accessible and inclusive information for all CNSC employees and the public.
- **Procurement of goods, services and facilities:** Ensure that accessibility is considered when making purchases that will be used by employees and members of the public.
- **Design and delivery of programs and services:** Ensure that CNSC employees are equipped to design and deliver external programs and services that are accessible to all.
- **Transportation:** This priority area under the ACA is not applicable to the CNSC. The CNSC follows the guidelines provided by the Public Services and Procurement Canada, which oversees government buildings.

The plan will be updated and published every 3 years and annual progress reports will be published in years 1 and 2. The CNSC will continue to evolve and adapt our action plan to meet the needs of employees and the public with disabilities. The CNSC will continue to consult people with disabilities when preparing and updating its accessibility plans.

## Accessibility statement

The CNSC is committed to creating a barrier-free, diverse and inclusive work environment for all employees and the public. The CNSC is working to strengthen our culture of equity, diversity and inclusion, which is the hallmark of a truly healthy, safe and successful organization. Showing leadership and taking action – collectively and individually – to foster an equitable workplace is among our top priorities.

## The Accessible Canada Act

The [Accessible Canada Act](#) (ACA) came into force on July 11, 2019. The purpose is to make Canada barrier-free in areas under federal jurisdiction, especially for persons with disabilities, by January 1, 2040, by removing barriers and preventing new barriers.

The ACA is under the leadership of the Minister of Employment, Workforce Developments & Disability Inclusion. The ACA established a regulatory body the Chief Accessibility Officer, defines the **Accessibility Commissioner** as the member of the Canadian Human Rights Commission that is appointed under subsection 26(1) of the Canadian Human Rights Act and that is referred to in that Act as the “Accessibility Commissioner”<sup>4</sup>.

The ACA defines “**barrier**” as: 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.

The ACA defines “**disability**” as: 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.

## Developing the CNSC’s Accessibility Plan 2022–25

This plan was developed and will be implemented in accordance with the principle “Nothing without us,” which recognizes that persons with disabilities are valuable members of our communities and engaged, contributing citizens in all areas of life<sup>5</sup>. Consultation with persons with disabilities is a key part of this process and will continue to inform the contents and implementation of our plan moving forward.

This plan will serve as our accessibility roadmap until 2025 and is in no way exhaustive. It is a starting point to address the challenges known to the organization at the time of the plan’s inception. We will continue to work towards addressing the varied, unique and nuanced

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<sup>4</sup> [Accessible Canada Act](#)

<sup>5</sup> [Nothing without us](#)

barriers faced by persons with disabilities as we become aware of the existing and new barriers to accessibility. Nevertheless, this plan seeks to advance awareness and drive positive action towards making the CNSC a more accessible and equitable workplace for persons of all abilities.

## **Governance**

This plan recognizes that all CNSC staff have a role in creating a barrier-free workplace, modelling respectful and inclusive behaviours, dispelling stereotypes and building a work environment based on mutual respect. The CNSC aims to create a safe, healthy and inclusive work environment where the similarities and differences of individuals are respected and valued so that everyone can reach their full potential and maximize their contribution to our mandate and organization.

To be successful in creating a barrier-free organization, we have established a dedicated Accessibility Plan Working Group, which will continue meet on a regular basis. This working group will continue to leverage feedback from staff and members of the public to inform this and future versions of the plan, as well implementation of key activities. We will also establish a governance framework involving senior leaders and subject matter experts representing branches and directorates from across our organization to drive and sustain our accessibility efforts.

## **Feedback on the plan**

The CNSC will publish this accessibility plan and annual progress reports on its internal and external websites, and employees and the public will have the opportunity to provide both anonymous and non-anonymous feedback on the plan and implementation, or the barriers individuals experience when working with or for the CNSC.

### **To provide feedback on the CNSC accessibility plan:**

- Complete the anonymous [online form](#)
- Send an [email \(accessibilityplan-planaccessibilité@cnsccsn.gc.ca\)](mailto:accessibilityplan-planaccessibilité@cnsccsn.gc.ca) to Senior Human Resources Advisor
- Write to the CNSC:
  - Feedback: Accessibility plan
  - Canadian Nuclear Safety Commission
  - 280 Slater Street, P.O. Box 1046, Station B
  - Ottawa, ON, K1P 5S9
- Call the CNSC (Monday – Friday 8:30 a.m. to 5 p.m. Eastern time)
  - Telephone (toll-free in Canada): 1-613-995-5894 or 1-800-668-5284 (in Canada only)
- Send a fax: 613-995-5086

The CNSC will document and review all comments, questions and suggestions formally submitted from staff and the public about our plan. The Accessibility Plan Working Group will assess this feedback and share it with the CNSC directorates responsible for implementing our strategy across the 7 key areas outlined in the ACA. All responses will be considered for integration into CNSC priorities, commitments and progress reports.

## **Monitoring and reporting**

This accessibility plan is only the beginning of the CNSC's work toward becoming a barrier-free organization by 2040.

We will work with persons with disabilities and internal stakeholders to develop a prioritized implementation plan. The implementation plan will include costing and resource allocations to support the deployment of key activities. Lessons learned, new research and emerging best practices and performance metrics will combine to measure the success of the plan. This will be supported by on going internal and external surveys and consultations to measure our progress against our commitments and other leading organizations, and to inform future activities necessary to creating a barrier-free organization.

Analyses will be continued on internal and external surveys (including the Public Service Employee Survey) and consultations to inform measures and benchmarks for a broader measurement framework for accessibility. These data will be important to identifying gaps and helping to prioritize actions to remove and prevent barriers to accessibility.

### **Progress reporting**

In addition to publishing an updated accessibility plan every 3 years, the CNSC will provide updates between plans through annual progress reports, as required by the ACA. These progress reports will include updates on actions committed to in the Accessibility Plan, how consultation with persons with disabilities continues to inform the plan, and how feedback received through the feedback process has been considered and incorporated.

## Consultations

The key to the development of the CNSC’s first accessibility plan has been engagement and consultation with employees with disabilities, the Accessibility Network and employee representatives – specifically the CNSC’s employee union, the Nuclear Regulatory Group (NUREG). The plan will be implemented in accordance with the principle “Nothing without us”, the [Accessibility Strategy for the Public Service of Canada](#). The following consultation mechanisms were used to develop the CNSC Accessibility Plan 2022–25:

- GBA+ on the CNSC’s Return to Workplace survey conducted in 2020
- Disability consultation conducted in 2021, with the expected outcome of learning more about the challenges that employees with disabilities experience and finding better ways to support them
- CNSC Pulse Survey on respect, inclusion and trust, conducted in January 2022
- Focus group with the CNSC Accessibility Network, conducted in May 2022
- Accessibility plan survey open to all employees and management in May 2022
- Consultation with the Accessibility Network and NUREG

The CNSC Diversity and Inclusion Plan 2019–22 called for the completion of an employment systems review (ESR), of which the findings were helpful in the development of the accessibility plan. Both the ESR findings and the GBA+ referenced above provided CNSC management with the issues of concern for equity-seeking groups, and they further clarified the particular challenges faced by employees who identified as living with a disability.

The CNSC’s objectives in consulting were not only to inform organizational plans, but were also to:

1. clarify findings from previous employee consultations
2. identify specific actions to support the removal of barriers within the key priority areas outlined in this plan
3. gain a deeper understanding of the challenges and barriers that employees with disabilities experience within the CNSC specifically
4. generate forward-thinking solutions on how the CNSC could better support employees with disabilities throughout the employment lifecycle

The CNSC determined that to meet those objectives it would administer another survey and conduct a focus group with the members of the organization’s Accessibility Network.

### **Focus group (May 19, 2022)**

- Members of the CNSC Accessibility Network were invited to participate in the focus group
- Break-out sessions focused on the exercise “start-stop-continue” list of key priority areas
- Each group discussed and provided insights related to the priority areas

- Key themes that surfaced from the discussion: access to accessible hardware and software, documentation in accessible formats, stigma and culture, accessible-first design

**An all-staff survey on the CNSC accessibility plan (May 29 to June 15, 2022)**

- 30 questions
- Voluntary, anonymous, and open to all staff
- Not all 147 respondents answered all survey questions
- Total number of responses received equates to 16% of the total employee base at the CNSC
- Survey consisted of questions on each of the key priority areas, self-identification, accessibility, and accommodation

The results of our consultation provided us with information to begin the development of the CNSC accessibility plan; established a baseline for measuring progress; and informed the priorities for the implementation of key activities in the 2023–24 fiscal year. As part of the next steps in creating a barrier-free organization, the CNSC will develop an implementation plan detailing key activities and timing, along with resource planning and costing.

**Barriers to accessibility – What we heard**

This accessibility plan reflects the inputs, views and responses from the CNSC. This section summarizes what we heard during the various mechanisms used to consult in the development of the plan, as well as prepare the organization to move forward in creating a barrier-free organization for all employees and the public.

Key theme	Internal challenges/barriers
IT systems and tools	<ul style="list-style-type: none"> <li>• Some internal systems (such as e-Access) have compromised functionality with screen magnification</li> <li>• The CNSC’s digital environment has not adapted to the particular needs of those with a visual impairment</li> </ul>
Communications other than ICT	<ul style="list-style-type: none"> <li>• Consistent use of plain written language that is straightforward, concrete, familiar words in documentation, presentations etc.</li> <li>• Documents not readily available in both official languages i.e., English and French, at the time of issuance</li> <li>• Documents are not always accessible – e.g. using plain language, simple sentences, using a proper heading structure, providing descriptions of important images or graphics, use of MS Word’s built-in accessibility checker</li> </ul>

Key theme	Internal challenges/barriers
Internal processes	<ul style="list-style-type: none"> <li>• Accommodation process, policies and guidelines for employees do not go into enough detail about expectations, roles and responsibilities, acceptable outcomes and recourse process</li> <li>• Ergonomics guidelines for employees are not accessibility friendly as there is no alternative text</li> <li>• Accessibility support/single point of contact, processes and guidelines are unclear</li> </ul>
Organizational Culture	<ul style="list-style-type: none"> <li>• Lack of training and awareness to champion accessibility, promote efforts to level the playing field, and educate on tools available within the organization</li> <li>• A culture of ableism – discrimination and social prejudice against people with disabilities based on the belief that typical abilities are superior</li> <li>• The importance of self-identification and the role it plays in program offerings</li> <li>• A culture of ableism, view or attitude that treats people without disabilities as normal and those with disabilities as abnormal, inferior, or other<sup>6</sup></li> </ul>

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<sup>6</sup> [Annex: Inclusive language considerations - Canada.ca](#)

## CNSC priority areas

The following subsections outline objectives, the current context, barriers, and actions for each of the priority areas identified in the *Accessible Canada Act*. It is important to note that the business process owners are responsible for their respective priority areas as it pertains to the resources and delivery on commitments made therein.

### Employment

#### Objective

To ensure that employees living with a disability, temporary or permanent, have the equal access and opportunity to fully participate in CNSC work and successfully contribute to their best potential. This includes ensuring that the CNSC respects and delivers on the priorities, programs, practices and services to identify, remove and prevent new barriers to accessibility. In cases where the CNSC does not have the knowledge to manage a unique accommodation request, external guidance will be sought from a subject matter expert.

#### Context

The CNSC's robust policy, best practice and training framework currently offers employees access to a full range of accommodations services and options, including:

**Flexible work policy:** A hybrid work model allows persons with disabilities who are unable to leave their homes or travel to an office easily to perform their work remotely on a full-time basis if their job duties allow.

**Office ergonomics directive:** This directive promotes and enables employees' easy access to ergonomic assessments and the provision of ergonomic equipment.

**Inclusive workplace policy:** This policy addresses and seeks to remove any disadvantage resulting from a rule, practice, or physical barrier that has or may have an adverse impact on individuals or groups protected under the [Canadian Human Rights Act](#) or identified as a designated group member under the [Employment Equity Act](#), including women, Indigenous peoples, persons with disabilities and visible minorities.

**Staffing policy:** The CNSC aims to provide inclusive human resource policies and best hiring practices to remove and prevent barriers to recruitment, development, retention and promotion of persons with disabilities. To ensure a fair hiring selection, the CNSC includes the following possible staffing assessment modifications to address a candidate's functional limitations:

- **Test environment:** For tests taken at the office, an offer to adapt the setting, such as selecting a quiet room, increasing/dimming the lights and using wheelchair-accessible areas, to name a few examples.

- **Test format:** Optional use of larger fonts, computer-based test or a live reader to explain or present instructions or questions.
- **Schedule or timing** of the test: This may include offering extra time, breaks, or scheduling the test at a particular time.
- **Response format:** Option to use speech-to-text software, or respond to questions verbally, rather than in writing.
- **Informed processes:** Every effort is made to find the right accommodation to suit the candidate’s legitimate needs. External experts are retained in cases where the CNSC does not have the knowledge to manage a particular accommodation request.

**Mental health best practices:** The CNSC believes that providing a respectful and healthy workplace is not only essential, but the right thing to do. We are committed to promoting mental well-being and a culture of acceptance and support for those who may be facing challenges with their mental health.

**Performance management and learning directive:** The CNSC offers a robust and progressive approach to learning and performance. We offer funding for training, continuing education and many meaningful opportunities professional and personal growth to keep our employees engaged and energized.

## Barriers

### Inclusive workplace

- Many employees don’t know where or how to seek accommodations at work; others feel the process contains multiple barriers (i.e., numerous forms, too many people to disclose to, too lengthy), and a strong burden of proof placed on those living with the disability.
- Employees receive inconsistent responses to accommodation requests from supervisors/managers.
- Supervisors/managers are not seen as knowledgeable in disability information or accommodation policies/processes.
- A common view is that the CNSC as a whole does not understand disabilities and has a perceived culture of “ableism”.

### Staffing

- The external and internal careers web pages are not user-friendly and present barriers to prospective candidates living with disabilities. For example, no text-to-speech assistance is available, and applications often time out.
- Inconsistent practice of interview timing and questions: Some interviewers have 4 questions, and some have significantly more within an hour time frame.
- Candidates experience challenges requesting accommodations in the hiring process. For example, facing stigma, short timelines, not knowing which accommodations were available, and inconsistency due to manager discretion. There is confusion around privacy and confidentiality in seeking an accommodation in a hiring process.

- There is a prevalence of misinformation related to employment equity as it pertains to persons with disabilities.
- There is perceived mindset among employees and managers who seek to disqualify, rather than to include, people with disabilities.

**Based on this information, the CNSC prioritized actions to:**

1. raise awareness about the importance of self-identification and reduce stigma associated with requesting an accommodation at any point during an individual’s employment experience
2. establish partnerships to increase opportunities to hire and successfully integrate persons living with disabilities into the CNSC
3. make it easy for individuals working for the CNSC to access accommodations
4. ensure digital tools or interfaces and documents are accessible

**Actions**

Priority/Action	Description	Lead	Timeline
<b>Awareness raising</b>			
Self-Identification campaign	The Human Resources Directorate is conceptualizing an effective campaign to educate staff on the importance of self-identification and to encourage them to do so.	Human Resources Directorate (HRD)	Ongoing
Establish an Advisory Council on Inclusion	Callout was made to CNSC staff and members were identified through an open application process. New members will undergo training before beginning official activities in fall 2022.	HRD	Completed
Accessibility program management	Establish clear accessibility program management; the governance, resources to carry out the monitoring and reporting.	HRD	July 2023
Establish an employee-led network on accessibility	Established in early 2022, it aims to provide members with a forum to discuss issues in relation to ableism and accessibility, and to ensure the full participation of employees with disabilities at the CNSC.	HRD	Completed
Continue to offer the Working Mind training to managers	Sessions are offered annually on a regular basis	HRD	Completed
Open Learning sessions on neurodiversity and accessibility	Open Learning session on neurodiversity was held in June 2021. HRD to continue conversation with the Accessibility Network on how to offer additional, targeted content on a scheduled basis to CNSC staff.	HRD in partnership with Accessibility Network	Ongoing

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Priority/Action	Description	Lead	Timeline
Publish 3 articles related to accessibility for employee audiences	<ul style="list-style-type: none"> <li>Staffing accommodations (complete)</li> <li>Requesting an accommodation</li> <li><i>Accessible Canada Act</i> and plan launch</li> </ul>	HRD	March 2023
Inclusive Workplace Policy	Review and update as required as per the CNSC's policy review cycle.	HRD consultation with ACI and all employee networks	2023–2024
Establish employment equity hiring goals	Establish 3-year hiring goals for each employment equity-seeking group based on the National Labour Market Availability. Note: This was done in consultation with both equity-seeking and non-equity-seeking employees.	HRD	Completed
Identify and establish partner agreements with key recruiting partners or programs	<ul style="list-style-type: none"> <li>Federal Internship Program for Canadians with Disabilities</li> <li>Employment opportunities for students with disabilities</li> <li>Policy and data analyst - careers for persons with disabilities</li> <li><a href="#">Specialisterne</a> - assists organizations in hiring highly qualified neurodiverse staff</li> </ul>	HRD	Ongoing
<b>Ease of Access</b>			
Monitor the development of the GC Accessibility Passport	The CNSC will review documentation and information available from the Treasury Board Secretariat (TBS) and implement as appropriate	HRD	September 2023
Integrate GC Accessibility Passport into HR processes	<ul style="list-style-type: none"> <li>Staffing</li> <li>Onboarding</li> <li>Learning</li> <li>Performance</li> <li>Departure</li> </ul>	HRD	2023–2024
Accessible digital interfaces and documents	Promote and teach how to leverage Accessibility tools in the MS365 and MS Teams environment	Information Management and Technology Directorate HRD	June 2023

## **The built environment**

### **Objective**

Provide an accessible built environment so that employees and the public experience barrier-free access to CNSC managed facilities.

The CNSC will work proactively with persons with disabilities to improve accessibility features within the built environment. Future work models such as hybrid working arrangements where time is split between office-based and telework locations will be taken into consideration to assess impacts on persons with disabilities and their workspaces.

### **Context**

The CNSC currently has offices in the National Capital Region, and site offices at nuclear facilities in the following regions:

- Point Lepreau, New Brunswick
- Chalk River, Ontario
- Bowmanville, Ontario
- Pickering, Ontario;
- Tiverton, Ontario

There are also regional offices in:

- Laval, Quebec
- Mississauga, Ontario
- Calgary, Alberta
- Saskatoon, Saskatchewan

As a minimum measure for accessibility, all federal workplaces are legally required to be compliant with the Canadian Standards Association's barrier-free design standards.

The CNSC site offices co-located in buildings owned by licensees must comply with relevant provincial accessibility standards.

According to the 2020 Public Service Employee Survey, 90% of the CNSC employees that had workplace accommodation measures in place were satisfied with the measures implemented. The rate for the overall public service was 82%.

The CNSC Facilities Management section implements modifications to the built environment on a case-by-case basis upon receipt of approved requests from management. The most common requests are installation of automatic door openers and electrical system modifications to accommodate reduced lighting levels.

Procedures have been established for providing assistance to persons with disabilities or other special needs in situations that require emergency evacuation of buildings.

The CNSC is in the process of converting the majority of its office space portfolio to Public Services and Procurement Canada's (PSPC) Government of Canada workplace ([GCworkplace design standards](#)). GCworkplace is an activity-based workplace design concept that features a variety of work points that are designed with productivity in mind and to support a broad range of activities.

### **GCworkplace design standards – Enhanced accessibility**

GCworkplace has been developed to be an accessible and inclusive workplace design standard. The program provides occupants with full control over the work setting that best suits their functional needs. By integrating accessibility at the onset of the design phase, GCworkplace is promoting an inclusive, equitable and adaptive workplace.

Between 2020–21, the [Office of Accessibility in the Built Environment](#) within PSPC partnered with the Centre for GCworkplace Innovation to host 25 consultations. More than 250 participants from 36 departments across the country participated. The consultations helped them to better understand the barriers that persons with disabilities face in the workplace.

Individual reports were prepared for 8 categories of disabilities:

- mobility, flexibility and dexterity
- visual
- hearing
- cognitive
- mental health
- intellectual
- chronic pain
- environmental/sensory

As a result of the feedback received through the consultation series, updates have been made to the [GCWORKPLACE DESIGN GUIDE](#) to improve acoustics, integrate elements of nature, as well as emphasize intuitive wayfinding and visual distinctions between spaces. GCworkplace will be continually adapted to ensure that all current and future employees can work in a barrier-free environment.

### **Barriers**

Conversion to GCworkplace design standards is contingent on the availability of project support from PSPC Real Property Branch Small offices, typically less than 300 m<sup>2</sup>, such as those in regional and site office locations do not benefit from conversion to GCworkplace standards as they do not provide enough space to integrate a full variety of work points. Ad-hoc solutions must be considered for these locations.

**Actions**

Priority/Action	Description	Lead	Timeline
<b>Consultation and portfolio planning</b>			
Review the built environment in consultation with persons with disabilities to identify how it could be more accessible and inclusive	Conduct post-occupancy surveys with persons with disabilities within 12 months of being accommodated in a new GCworkplace location	Financial and Administration Directorate (FAD)	2023–2025
Assess options to conduct accessibility assessments of the CNSC occupied buildings	Engage an accessibility consultant; based on the findings, develop an action plan to assess the feasibility of improving accessibility in the built environment, cost implications, and a method for prioritizing actions	FAD	2024–2025
Contribute to Government of Canada initiatives aimed at the development of office standards and new workspaces which promote barrier-free environments	Convert over 70% of the CNSC office space portfolio to GCworkplace design standards by 2025	FAD	December 2025
<b>Policy frameworks</b>			
Update the CNSC facilities management framework	Revise the CNSC facilities management framework relative to the built environment to support accessibility and inclusivity	FAD	October 2025
Ensure compliance with office accommodation standards	Monitor building features to ensure compliance with PSPC guidelines and building code requirements for all the CNSC buildings	FAD	Ongoing
Implement GOC Accessibility Passport program recommendations	Implement recommendations related to office accommodation and the built environment received through the adoption of the Government of Canada Accessibility Passport program	FAD	Ongoing

## Information and communication technologies (ICT)

### Objective

To ensure that the CNSC employees and the people served by the CNSC can perceive, understand, navigate, interact with its information, services, computers and/or other electronic devices.

### Context

The CNSC has already begun, to a limited extent, assessing ICT for their compliance in accordance with the European Standard for Digital Accessibility ([EN 301 549<sup>7</sup>](#)). This is the standard that the Treasury Board Secretariat (TBS) has opted to follow. The Information Management and Technology Directorate (IMTD) put in place an IMTD ICT project team that is assessing the CNSC's current maturity level against the TBS- developed Accessible ICT Scorecard Assessment. Once completed, the IMTD ICT Accessibility project team will create an ICT accessibility plan that will identify incremental work to be carried out so that ICT accessibility at the CNSC can progress from its current level 1 maturity to level 3.

The IMTD ICT accessibility plan will implement and/or improve processes to optimize the following areas or dimensions as they are referred to in the Accessible ICT Maturity Model:

1. Governance and accountability
2. Supporting workforce capacity and capabilities
3. Planning, testing and validation
4. Procurement of ICT goods and services
5. User feedback mechanisms
6. Software and associated services
7. Hardware and associated services
8. Digital Content and tools and associated services

The CNSC has set a target of meeting a level 3 maturity on the ITC maturity model within 3 years. In practice, this means documented processes in use for each of the above elements, including provision for their periodic review and update. At that stage, the CNSC will conduct a benchmarking exercise to identify residual gaps necessary to reach the highest level of maturity (level 5), and from there identify future priorities.

### Barriers

Technology often helps people with disabilities perform everyday tasks. ICT, including computers and internet, make it easier for stakeholders and employees to interact and conduct business. However, ICTs can sometimes be a barrier that limits people's access to the world around them. Technology barriers happen when technology is not accessible to people with disabilities.

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<sup>7</sup> [EN 301 549 - V3.2.1 - Accessibility requirements for ICT products and services](#)

Specific barriers will be identified through IMTD’s work on assessing and improving the CNSC’s ICT accessibility maturity level.

### Actions

Priority/Action	Description	Lead	Timeline
IMTD accessibility project team	Established an IMTD ICT accessibility project team	Information Management and Technology Directorate (IMTD)	Completed
ICT maturity level	Assessing ICT maturity level	IMTD	In progress* (*pending TBS final timelines)
ICT accessibility plan	Create an ICT accessibility plan to reach ICT accessibility maturity level 3, in consultation with people with disabilities	IMTD	In progress* (*pending TBS final timelines)
ICT accessibility plan implementation	Implement the ICT Accessibility Plan	IMTD	March 2025

## Communication, other than ICT

### Objective

Content, in print and on digital platforms, provides accessible and inclusive information for all the CNSC employees and the public.

### Context

The focus in this priority area for 2022–25 is the CNSC website, which the public visit to obtain information on nuclear safety and the nuclear industry, and to support their participation in the regulatory process.

With its website, the CNSC aims to:

- disseminate scientific, technical, and regulatory information to the public
- provide the nuclear industry with efficient access to key information and regulatory document
- communicate the CNSC’s commitment to public consultation
- ensure that the information/content and the website are aligned and comply with accessibility and international and Government of Canada web standards
- ensure that web content and web applications are accessible to visitors using assistive technologies or with disabilities, as well as comply with accessibility and Government of Canada web standards
- provide accessible webcast public Commission proceedings

### Barriers

- **Website content not accessible to all Canadians:** TBS defines content as information and sensory experience to be communicated to the user by means of a user agent, including code or mark-up that defines the content's structure, presentation, and interactions.<sup>8</sup>
- **Interoperability issues:** TBS defines web interoperability as the ability of different types of platforms, devices, networks, and applications to work together effectively, without prior communication, to find, retrieve, exchange, and re-use web content in a useful and meaningful manner.
  - There are 3 areas of interoperability: semantic, structural and syntactical. Ensure that web pages are built using HTML5 or later.
  - HTML5 can also be written in XHTML syntax, known as XHTML5.
- **Challenges related to web portability:** Extent to which Web content can be delivered and consumed on different platforms and devices.

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<sup>8</sup> [Standard on Web Accessibility- Canada.ca](https://www.accessibility.ca/en/standard-on-web-accessibility-canada-ca)

## Actions

Priority/Action	Description	Lead	Timeline
Web content audit	Review content to ensure it meets Web Content Accessibility Guidelines from the World Wide Web Consortium (W3C)	Strategic Communications Directorate (SCD)	December 2023
Ensure that web content is easy to find, easy to understand and easy to use for everyone, including people who have physical or cognitive disabilities	Use plain language and write content for a digitally enabled government that is available anytime, anywhere, through any service window. Follow the Canada.ca content style guide <sup>9</sup>	SCD	Ongoing
Update the website information architecture to improve navigation and simplify page layout	Implement the latest Canada.ca template and follow Government of Canada standards on accessibility and usability	SCD	Ongoing
Update all web graphics with accessible formats of graphics	Web modernization project; migration of existing content, formatting of new graphics.	SCD, IMTD	Ongoing
Reduce the use of PDFs on the CNSC’s website	Convert PDFs to accessible web content (HTML) and/or provide alternate format(s) for PDFs currently posted on website	SCD	Ongoing
Conduct consultations / seek guidance with persons with disabilities / representative organizations about barriers within these areas	Continue efforts to make lasting improvements to the accessibility of the CNSC website and respond to the needs of people with disabilities	SCD	December 2023

<sup>9</sup> [Canada.ca Content Style Guide - Canada.ca](https://www.canada.ca/content-guide)

## **The procurement of goods, services and facilities**

### **Objective**

Accessibility is considered when making purchases that will be used by employees and citizens.

### **Context**

The creation of an accessible environment is only possible if the facilities, goods, and services are delivered in an accessible manner. Since the CNSC procures goods and services to support the organization in the delivery of its mandate, it is important that these purchases meet accessibility requirements. Only then will it be possible to create a truly accessible environment for citizens and employees.

The CNSC has already begun to consider accessibility when making purchases. In fact, the CNSC Directive on the Management of Procurement requires that, where appropriate, business owners:

- include accessibility considerations when specifying requirements for goods, services and construction
- ensure deliverables incorporate accessibility features

### **Barriers**

Based on Public Services and Procurement Canada (PSPC) guidelines, in order to support the CNSC business owners in meeting their accessibility obligations, the CNSC will:

- raise awareness and promote training for procurement officers and business owners to ensure accessibility is considered at the early stages of the procurement process
- update work procedures to include obtaining confirmation from business owners that they have considered accessibility when a purchase is initiated or have provided justification for not including accessibility criteria
- equip managers and corporate credit card cardholders with guidance on purchasing low-dollar-value assistive items and tools for employees using credit cards, to ensure that needs are accommodated in a timely fashion

**Actions**

In order to support CNSC business owners, based on PSPC guidance, as it relates to meeting their accessibility obligations, the CNSC will:

Priority/Action	Description	Lead	Timeline
Build awareness	Raise awareness and promote training for procurement officers and business owners to ensure that accessibility is considered at the early stages of the procurement process	Finance and Administration Directorate (FAD)	November 2023
Work procedures	Update work procedures to include obtaining confirmation from business owners that they have considered accessibility when a purchase is initiated or have provided justification for not including accessibility criteria	FAD	December 2023
Corporate credit card guidance	Equip managers and corporate credit card cardholders with guidance on purchasing low-dollar-value assistive items and tools for employees using credit cards, to ensure that needs are accommodated in a timely fashion	FAD	December 2023

## **The design and delivery of programs and services**

### **Objective**

To ensure that CNSC employees are equipped to design and deliver external programs and services that are as accessible for all.

### **Context**

To fulfill its mandate as Canada’s nuclear regulator, the CNSC maintains a robust regulatory program and strives to ensure that the public and Indigenous peoples have meaningful information about, and the opportunity to participate in, the nuclear regulatory process.

The CNSC’s external programs and services include:

- maintenance of the regulatory framework
- licensing, certification, and compliance
- information dissemination
- consultation and engagement with the public and indigenous peoples
- the Independent Environmental Monitoring Program and laboratory services
- funding programs

Delivering these programs and services involves activities such as:

- live events such as Commission proceedings, information sessions (i.e., outreach events)
- production of documents and online content
- development of regulatory instruments
- administration of funding and other application processes
- Solicitation of input through an e-consultation platform
- posting of content to the external website during licensing proceedings (intervenor and select licensee documents)
- administration of certain certification exams (externally)

The CNSC is already making progress on the accessibility of its programs and services. Commission proceedings are transitioning to a hybrid delivery model, providing in-person and remote options for participants. Furthermore, webinar recordings are posted online with closed captions, and the CNSC’s e-consultation platform complies with accessibility standards as outlined by Web Content Accessibility Guidelines. The CNSC has also begun including plain-language summaries in public technical documents.

## Barriers

The CNSC continues to work on identifying potential barriers in its programs and services. Some already identified include:

- accessibility of online application processes (e.g., for funding, to intervene, or for licensees) – they are hard to navigate and are not available in accessible formats
- accessibility of live events – currently do not offer sign language, closed captioning, or other accessibility services, and few offer live translation
- accessibility of all public documents – formatting documents with alt-text, plain language summaries, and non-pdf format is not always done
- accessibility of regulatory instruments – the impacts of regulatory instruments on people with disabilities is unknown
- accessibility of hearings for intervenors – intervenors in Commission proceedings are not asked whether they need accommodations to participate

## Actions

Priority/Action	Description	Lead	Timeline
<b>Develop and deliver accessible programs and services</b>			
Checklists within templates, accessible format	<p>Modify checklists within templates to indicate the need for content/documents to be accessible (i.e., incorporating principles of accessible design) before they are posted to the external website.</p> <p>Examples:</p> <ul style="list-style-type: none"> <li>• Internal Quality Management Division to modify “Create Revise, or Remove Navigator Documentation” template</li> <li>• Notices of event reports and administrative monetary penalty are posted on the external website</li> </ul>	Various CNSC Directorates	December 2024
Documents and presentations on external website are accessible	Only accept content for posting to the external website if it meets accessibility standards	<p>Lead: Various CNSC content owner/requestor</p> <p>Supporting: SCD comms advisors, SCD web team, IMTD web team</p>	2024–2025
On-line application processes are accessible	Ensuring that content on the external website that relates to applications	Commission Registrar, SPD	2024–2025

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Priority/Action	Description	Lead	Timeline
	for funding, to intervene, or for licensees are accessible		
Public events / videos posted are accessible	Ensuring that public events (Commission proceedings and outreach) are accessible (sign language interpretation, accurate closed captioning in events posted, etc.)	Lead for Commission proceedings: Commission Registrar  Lead for Outreach: RPD  Supported: SCD	2024–2025
<b>Systematically assess CNSC external programs and services</b>			
Obtain feedback from external groups	<ul style="list-style-type: none"> <li>• Leverage existing mechanisms to interact with external groups</li> <li>• Invite comments with respect to the accessibility of CNSC live events and website/hearings at meetings involving already established networks; e.g., meetings with Indigenous groups, public Meet the Nuclear Regulator sessions</li> </ul>	RPD, SPD	Ongoing Assess progress: 2024–2025
Leverage GBA+ tools and processes	Incorporate accessibility considerations into existing review cycles when updating regulatory instruments	RPD	Ongoing Assess progress 2024–2025
Conduct external workshops with the public	Seeking inputs, feedback from licensees, funding programs groups on accessible plan as it relates to delivery of programs and services	SPD, RPD, Commission Registrar	2023–2024
<b>Public hearings</b>			
Integrate accessibility considerations in CNSC public hearing processes at exterior locations	Work with the CNSC Commission Registry staff to ensure that accessibility requirements are integrated for public proceedings, whether in a CNSC or GOC building or in an external public setting	Commission Registrar	Ongoing

## **Transportation**

This priority area under the *Accessible Canada Act* does not apply to the CNSC. The CNSC follows the guidelines provided by the PSPC, which oversees government buildings.

## **Conclusion**

The *Accessible Canada Act* seeks to create a Canada without barriers by January 2040. The CNSC has a key role to play in helping to achieve this goal. The CNSC has committed to creating a diverse, safe, respectful, healthy, and inclusive workplace. This means a commitment to identifying, removing, and preventing barriers to full participation for persons with disabilities, dismantling a culture of ableism, and including employees with disabilities in decision-making processes on issues that directly affect them. The organization must also keep an accessibility lens as it navigates a safe, timely return to the workplace, and works to transform its priority areas such as employment, IT systems and communications. The CNSC will continue to evolve and adapt this action plan to meet the needs of employees and the public living with disabilities.

## List of acronyms

ACA	<i>Accessible Canada Act</i>
CNSC	Canadian Nuclear Safety Commission
FAD	Finance and Administration Directorate
GBA+	Gender-based Analysis Plus
GC	Government of Canada
GCworkplace	Government of Canada workplace
GOC	Government of Canada
HRD	Human Resources Directorate
IMTD	Information Management and Technology Directorate
NUREG	Nuclear Regulatory Group
RPD	Regulatory Policy Directorate
PSPC	Public Services and Procurement Canada
SCD	Strategic Communications Directorate
SPD	Strategic Planning Directorate
TBS	Treasury Board of Canada Secretariat